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ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)



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List of Abbreviations and Acronyms

ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank (AIIB)
ATL	Aviation Travel and Logistic Holding Ltd
CRA	Climate Risk Assessment
DLIs	Disbursement-Linked Indicators
EHS	Environmental, Health and Safety
E&S	Environmental and Social
ESEL	Environmental and Social Exclusion List
ES-PAP	Environmental and Social Program Action Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESSA	Environmental and Social Systems Assessment
GoR	Government of Rwanda
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
ICAO	International Civil Aviation Organization
IFC-PS	International Finance Corporation Performance Standards
ITS	Intelligent Transport Systems
IVA	Independent Verification Agency
MDBs	Multilateral Development Banks
MINECOFIN	Ministry of Finance and Economic Planning
MININFRA	Ministry of Infrastructure
MPWT	Ministry of Public Works and Transport
NDP	National Development Plan
NKIA	New Kigali International Airport
NST-2	Second National Strategy for Transformation (2024–2029)

OHS	Occupational Health and Safety
OPRC	Output- and Performance-Based Road Contract
OSBP	One Stop Border Post
PAD	Project Appraisal Document
PDO	Project Development Objective
PAP	Project Action Plan
PIU	Program Implementation Unit
PPP	Public-Private Partnership
PT	Project Team
RAC	Rwanda Airports Company
RBF	Results-Based Financing
RBP	Rwanda Integrated Sustainable Transport Program
RCAA	Rwanda Civil Aviation Authority
REMA	Rwanda Environment Management Authority
RFR	Rwanda Feeder Roads
RLI	Rwanda Labour Inspectorate
RSSB	Rwanda Social Security Board
RTDA	Rwanda Transport Development Agency
RISTP	Rwanda Integrated Sustainable Transport Program
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SoE	State-Owned Enterprise
SWOT	Strengths, Weaknesses, Opportunities, and Threats
ToR	Terms of Reference
TSSP	Transport Sector Strategic Plan
WB	World Bank

EXECUTIVE SUMMARY

This report presents the **Environmental and Social Systems Assessment (ESSA) for the Rwanda Integrated Sustainable Transport Program (RISTP).**

Guided by the Second National Strategy for Transformation (NST-2, 2024–2029) and the Transport Sector Strategic Plan (TSSP), the Government of Rwanda is investing in a modern, safe, efficient, and climate-resilient transport system to accelerate economic transformation, enhance regional connectivity, and foster inclusive and sustainable development. To support these priorities, the Government, through the Ministry of Finance and Economic Planning (MINECOFIN) and the Ministry of Infrastructure (MININFRA), has requested a USD 200 million loan from the Asian Infrastructure Investment Bank (AIIB) to finance the **Rwanda Integrated** Sustainable Transport Program (RISTP) Result Based Program (RBP).

RBP Scope, Objective, and Key Result Areas*:** The RISTP is a nationwide, three-year RBP (2026–2029) that seeks ***to improve the safety, efficiency, and climate resilience of strategic road corridors and airports while strengthening institutional capacity for sustainable transport sector management. The Program comprises three components: **(i) Road Infrastructure (70%)**, implemented by the Rwanda Transport Development Agency (RTDA), covering the maintenance, and rehabilitation of approximately 1,500 km of national roads and 500 km of feeder roads to improve connectivity, trade, and exports; **(ii) Airport Infrastructure and Modernization (25%)**, implemented by Aviation Travel and Logistic Holding Ltd (ATL) and the Rwanda Airports Company (RAC), focusing on airport safety improvements, aviation security modernization, decarbonization initiatives, and workforce development; and **(iii) Institutional Capacity Building (5%)**, implemented by the Ministry of Infrastructure (MININFRA), to strengthen transport sector planning, coordination, oversight, and technical capacity through training, technical studies, and institutional reforms.

RBP Implementing Institutional and Arrangements: The RBP will be overseen by a Steering Committee comprising the MINECOFIN, the MININFRA, the RTDA, and ATL, which will provide strategic oversight and guidance. The MININFRA, through its Transport Directorate, will coordinate overall RBP implementation, including monitoring and evaluation, coordination among implementing agencies, and verification of Disbursement-Linked Indicators (DLIs). Implementation responsibilities are divided among the three implementing agencies: RTDA will deliver the road infrastructure component, ATL the airport infrastructure and modernization component, and MININFRA the institutional capacity-building component. Day-to-day Program coordination, reporting, and performance monitoring will be managed by the Program Implementation Unit (PIU) under the Transport Directorate.

Objective of the Environmental and Social Systems Assessment (ESSA): As part of Results-Based Program (RBP) preparation, AIIB conducts an Environmental and Social Systems Assessment (ESSA) to evaluate the adequacy and capacity of the Borrower's (Rwanda's) legal, regulatory, and institutional systems for managing environmental and social risks and impacts during Program implementation. This is important because, under the RBP financing modality, program implementation relies on the Borrower's national legal, policy, and institutional framework rather than the direct application of the AIIB Environmental and Social Standards (ESS) as defined in AIIB ESF (Environmental and Social Framework).

The ESSA was undertaken as part of AIIB's due diligence for the RBP to assess the adequacy and capacity of Rwanda's legal, regulatory, and institutional systems for managing the Program's environmental and social (E&S) risks and impacts. The assessment evaluated the consistency of Rwanda's national systems with the seven AIIB RBP Core Environmental and Social Principles, identified potential environmental and social risks and institutional capacity gaps, and reviewed the ability of key implementing and regulatory agencies to effectively manage RBP implementation.

The ESSA also screened the Government's broader transport program to define the RBP boundaries by excluding activities with potentially significant adverse environmental and social impacts. Based on its findings, the assessment recommends measures to strengthen national systems through an Environmental and Social Program Action Plan (ES-PAP), supporting effective risk management and compliance throughout Program implementation.

ESSA Methodologies: The ESSA was conducted using ***a structured and consultative approach that combined desk reviews, field visits, interviews and discussions, stakeholder consultations, systems analysis, comparative review, and stakeholder validation.*** The assessment reviewed PBP documents and Rwanda's legal, regulatory, and institutional frameworks; assessed the environmental and social risks and impacts of the proposed RBP activities; evaluated the capacity of implementing and regulatory institutions; and benchmarked Rwanda's national systems against the seven AIIB Results-Based Program (RBP) Core Environmental and Social Principles.

*A **Strengths, Weaknesses, Opportunities, and Threats (SWOT)*** analysis was applied to identify legal, institutional, and procedural gaps, assess institutional capacity, and recommend measures to strengthen system performance and accountability. The assessment also reviewed lessons from previous Results-Based Financing (RBF) operations supported by Multilateral Development Banks (MDBs), including the World Bank Group, to identify good practices and assess the implementation of Environmental and Social Program Action Plans (ES-PAPs). Based on the identified strengths and gaps, the ESSA developed an Environmental and Social Program Action Plan (ES-PAP) to strengthen national systems and enhance environmental and social risk management during Program implementation. The ESSA findings were validated through a multi-stakeholder workshop held on 8 July 2026, and stakeholder feedback was incorporated into the final report.

Summary of Environmental and Social Systems Assessment: The ESSA key findings are summarized below:

Potential Environmental, Social, and Economic Benefits and Risks of the Proposed RBP

Benefits: The RISTP is expected to deliver substantial socioeconomic benefits by improving regional and rural connectivity, facilitating trade and exports, enhancing access to markets and essential services, strengthening climate resilience, supporting tourism, and improving airport safety and operational efficiency. The regional airport investments extend the Program's benefits beyond Kigali and support balanced regional development. Upgrading Musanze Aerodrome will improve access to the Volcanoes National Park tourism region, stimulate tourism, business, and regional economic growth, and strengthen connectivity between Kigali and Northern Rwanda. Upgrading the Rescue and Fire Fighting Service (RFFS) at Kamembe Airport from Category 6 to 7 will enhance airport safety, enable operations by larger aircraft, and support increased passenger traffic, trade, and investment in the Western Province. Together, these investments will strengthen Rwanda's national airport network, improve domestic and international connectivity, promote tourism and trade, and reinforce the country's role as a regional transport and logistics hub.

Anticipated Environmental and Social Risks of the Proposed Activities: The ESSA found that the RBP's environmental and social risks are generally ***moderate, localized, predictable, and manageable, as most road interventions involve maintenance and rehabilitation within existing road corridors and airport works are confined to existing facilities.*** Key environmental risks related to **road works** include soil erosion, sedimentation, air and noise pollution, slope instability, waste generation, impacts on water resources and biodiversity, and climate-related hazards. Occupational health and safety risks include exposure to heavy machinery, traffic, hazardous materials, dust, noise, and unsafe working conditions. Social risks include limited land acquisition and resettlement, community health and safety concerns, labor and working conditions, Gender-Based Violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), child protection, and equitable access to training opportunities.

The ESSA assessed the proposed airport investments, which include the procurement of electric vehicles, digital airport management and safety systems, emergency response equipment, and staff training to enhance operational efficiency, safety, and security. The Program will also upgrade the Rescue and Fire Fighting Service (RFFS) at Kamembe Aerodrome from ICAO Category 6 to Category 7 through the acquisition of two rescue and firefighting vehicles. As these activities are primarily limited to equipment procurement and installation rather than major civil works, significant environmental and social impacts are not expected. The main environmental risk relates

to the generation of electronic and hazardous waste, including obsolete electronic equipment and electric vehicle batteries, which will require proper management and disposal.

The ESSA concludes that these risks can be effectively managed through environmental and social screening, preparation and implementation of site-specific environmental and social management instruments, integration of environmental and social requirements into procurement and contracts, stakeholder engagement, accessible grievance redress mechanisms, institutional capacity strengthening, and effective monitoring and supervision. Environmental impacts associated with electronic and hazardous waste can be further minimized through the application of Extended Producer Responsibility (EPR) principles to ensure the proper collection, recycling, and environmentally sound disposal of obsolete electronic equipment and electric vehicle batteries. In line with the agreed exclusion criteria, activities with potentially significant adverse environmental and social impacts will not be eligible for financing under the RBP.

Rwanda Legal and Policy Position: The ESSA assessed Rwanda's environmental and social (E&S) management systems against the seven AIIB Results-Based Program (RBP) Core Environmental and Social **Principles.** The assessment found that Rwanda has a comprehensive legal, policy, and institutional framework capable of managing the environmental, occupational health and safety (OHS), labor, and social risks associated with the proposed Program. The national system is supported by well-established institutions, including the Rwanda Environment Management Authority (REMA), Rwanda Development Board (RDB), Rwanda Labour Inspectorate (RLI), Rwanda National Police (RNP), National Public Prosecution Authority (NPPA), National Commission for Human Rights (NCHR), and the Rwanda Social Security Board (RSSB), which collectively provide regulatory oversight, compliance monitoring, labor protection, grievance redress, and enforcement. The ESSA reviewed more than 17 national laws, together with relevant policies, regulations, and guidelines, to assess the adequacy of Rwanda's legal and institutional framework for implementing the Results-Based Program (RBP).[1]

Capacity of RBP Implementing Institutions: Overall, the implementing agencies have clearly defined mandates and experience in delivering infrastructure projects, including those financed by

1. [1] *Law No. 48/2018 of 13/08/2018 on Environment (Rwanda); Environmental Impact Assessment Guidelines 2006; Ministerial Order No. 001/2019 of 15/04/2019; Law No. 55/2011 of 14/12/2011 Governing Roads in Rwanda; LAW No. 001/2023 of 13/01/2023 Governing National Parks and Nature Reserves; Law No. 046/2024 of 04/06/2024 Governing Forests and Trees in Rwanda; Law Governing Biodiversity in Rwanda (N° 70/2013 of 02/09/2013): Ministerial Order N°27 of 27/08/2018 Determining Modalities for Concluding a Concession Agreement for Tourism Investment in Protected Areas; Regulation No 002 of 26/04/2018 Governing E-Waste Management in Rwanda; Law No. 72/2019 of 29/01/2020; Labour Law No 66/2018 of 30/08/2018 (Rwanda); Law No 71 of 2018: Protection of the Child in Rwanda; Law No. 59 of 2008 on Prevention and Punishment of Gender-Based Violence (Rwanda); Law No. 27/2021 of 10/06/2021 Governing Land in Rwanda; Rwanda Traffic Law (Presidential Order No 25/01 of 25/02/2015 Modifying the General Traffic and Road Traffic Regulations); Law No 20/2018 of 29/04/2018 Establishing Regulations Governing Civil Aviation (Rwanda); and Law No 10/2012 of 02/05/2012 Governing Urban Planning and Building in Rwanda:*

multilateral development banks. However, institutional capacity to manage environmental and social risks varies across agencies.

***The Ministry of Infrastructure**:* The ministry has experience in coordinating donor-funded programs and integrating E&S considerations through project-specific safeguards specialists but does not have a dedicated Environmental and Social Unit/Department or a ministry-level grievance redress mechanism (GRM). Given its role in implementing the RBP's institutional capacity-building component, the ESSA recommends establishing a functional GRM and strengthening internal capacity for E&S management. MINECOFIN will provide overall financial oversight, resource mobilization, and coordination of development partner support, including integration of environmental and social considerations into national planning and budgeting.

Rwanda Transport Development Agency (RTDA): The RTDA has a well-established environmental and social safeguards system, extensive experience implementing development partner-funded infrastructure projects, and a functional grievance redress mechanism. However, the expanding portfolio of road projects has stretched its safeguards capacity, highlighting the need for additional environmental and social staff, strengthened occupational health and safety (OHS) oversight, and capacity building on Results-Based Program (RBP) implementation.

Aviation Travel and Logistics Holding Ltd (ATL). The ESSA found that ATL has limited experience in managing the environmental and social requirements of multilateral development bank-financed projects. To strengthen its capacity, the ESSA recommends recruiting dedicated environmental and social safeguards staff, establishing stakeholder engagement and grievance redress mechanisms, integrating environmental and social requirements into procurement and contract management, implementing SEA/SH risk prevention measures, and adopting internationally recognized environmental and occupational health and safety management systems.

Rwanda Environment Management Authority (REMA): The ESSA found that the REMA has a strong legal mandate and technical capacity to regulate, monitor, and enforce environmental compliance. REMA provides oversight of environmental assessments, compliance monitoring, environmental audits, inspections, and technical guidance to implementing agencies, while collaborating with decentralized authorities to strengthen environmental governance. However, the assessment identified capacity constraints related to limited staffing, financial resources, environmental monitoring equipment, and social risk expertise, which affect nationwide compliance monitoring. REMA also highlighted the need to strengthen institutional coordination, post-construction monitoring, contractor compliance, district-level oversight, and digital monitoring systems. To support the RBP, REMA will provide technical guidance, compliance monitoring, environmental audits, and capacity building to ensure effective implementation of

Environmental and Social Management Plans (ESMPs) and compliance with national environmental requirements.

Rwanda Development Board (RDB): The ESSA found that the RDB plays a central role in environmental and social risk management by coordinating the review and approval of Environmental and Social Impact Assessments (ESIAs), issuing environmental clearances, and overseeing compliance through its One-Stop Centre in collaboration with REMA and other sector agencies. RDB also oversees biodiversity conservation and will play a key role in reviewing any subprojects located within or near protected areas.

However, the assessment identified significant capacity constraints within the ESIA Unit, including inadequate staffing and the need for additional technical capacity to effectively review the increasing number of infrastructure projects. The ESSA recommends strengthening RDB's human resources and technical capacity to improve the quality and timeliness of ESIA reviews and environmental compliance oversight during Program implementation.

Rwanda Labour Inspectorate (RLI): The ESSA found that the Rwanda Labour Inspectorate (RLI), under the Ministry of Public Service and Labour (MIFOTRA), has a strong legal mandate to enforce labour laws and occupational health and safety (OHS) standards through workplace inspections, accident investigations, compliance monitoring, and technical guidance. RLI has played an important role in supporting infrastructure projects by promoting OHS compliance and strengthening workplace safety.

However, the assessment identified capacity constraints, including an insufficient number of labour inspectors, limited financial and technical resources, and increasing demands arising from the expansion of infrastructure projects. The ESSA recommends strengthening RLI's institutional capacity through additional staffing, specialized training, improved inspection and reporting systems, enhanced contractor compliance, and closer coordination with implementing agencies to ensure effective OHS oversight during Program implementation.

Integrated Risk Assessment: The ESSA concluded that the proposed RBP presents **overall low to moderate environmental and social risks**. As the proposed road and airport works will be undertaken within existing road corridors and airport boundaries, impacts are expected to be localized, temporary, and manageable through standard environmental and social mitigation measures. Key risks include soil erosion, drainage disruption, pollution, occupational and community health and safety, and climate-related hazards, particularly in environmentally sensitive and mountainous areas. Limited land acquisition and resettlement may also occur where road widening, realignment, or drainage improvements are required and will be managed through appropriate compensation and resettlement measures.

Program Action Plan: To address the identified environmental and social (E&S) risks, impacts, and system gaps, the RBP ESSA has recommended a set of appropriate mitigation and capacity strengthening measures to be implemented throughout PRB implementation. These measures form

part of the **Program Action Plan (PAP**), which will guide actions to be undertaken prior to and during Program execution (Table 3).

A. <u>Environmental, Social, and OHS Risk Mitigation Measure related to Road Works</u>

- ***Submit the Annual Work Plan and Budget (AWPB)*** to AIIB for review and clearance to ensure exclusion of Category A and other ineligible high-risk activities.
- **Prepare and implement Environmental and Social Impact Assessments (ESIAs)** for the rehabilitation of national and international roads, natural resource extraction, and other activities requiring a full ESIA, in accordance with Ministerial Order No. 003/MoE/25 of 19/08/2025.
- **Prepare a Project Brief and site-specific Environmental and Social Management Plan** (ESMP) for each road subproject that does not require a full ESIA to identify and manage environmental, occupational health and safety (OHS), social, and security risks.
- ***Screen all subprojects to exclude Category 'A' and other High-Risk*** activities in accordance with Rwanda's screening system, EIA requirements, and AIIB RBP requirements.
- ***Strengthen Environmental, Social, and OHS Management Capacity:*** Integrate environmental, social, labour, occupational health and safety (OHS), and community health and safety requirements into procurement and contract documents; assign dedicated environmental and social personnel for the RBP within RTDA; allocate adequate financial and human resources for implementation; and provide regular training on environmental, social, labour, OHS, and community health and safety requirements.
- ***Strengthen Compliance Monitoring and Inter-Agency Coordination.*** Establish robust monitoring and reporting systems for contractor compliance, including regular site inspections, incident reporting, corrective actions, and enhanced coordination between RTDA, Labour Inspectors, and other relevant regulatory agencies to improve supervision, enforcement, and accident investigations.
- ***Strengthen Environmental and Road Safety Management in Protected Areas*.** Enhance supervision of construction activities within and adjacent to protected areas through multi-agency oversight, implementation of contractor environmental management measures, strengthened traffic management, enforcement of speed limits, installation of appropriate road safety infrastructure (including signage, speed cameras, and traffic calming measures), and collaboration with transport operators and park authorities to protect biodiversity and improve visitor and wildlife safety.
- ***Strengthen Environmental Protection Measures in Protected Areas*** through enhanced supervision, speed control, signage, enforcement, and public awareness.
- ***Strengthen land acquisition planning by conducting early screening of all subprojects to identify potential land acquisition and resettlement impacts***, promptly assessing any additional land acquisition requirements arising from design changes, and ensuring adequate budget allocations, including contingency funds, for the timely payment of compensation and implementation of resettlement measures. To verify that all Project Affected Persons (PAPs),

particularly those experiencing economic displacement, have been fairly compensated and their livelihoods appropriately restored where applicable, RTDA should undertake post-compensation monitoring.

- ***Ministry of Infrastructure to Devise Fair and Inclusive Distribution of Program Benefits Related to Capacity Building and Training Across Transport Sector Institutions.***

B. Mitigation Measures for E-Waste and Related Risks from Airport Equipment Procurement

To effectively manage environmental risks related to generation of electronic waste ATL, should implement the following measures:

- ***Integrate EPR into Procurement:*** Require suppliers, where feasible, to implement Extended Producer Responsibility (EPR), including take-back, recycling, or environmentally sound disposal of end-of-life electronic equipment and batteries.
- ***Establish an E-Waste Management Procedure:*** Develop and implement procedures for the collection, storage, handling, transportation, and disposal of e-waste in line with national regulations and international good practice.
- ***Partner with Licensed E-Waste Recyclers:*** Engage licensed e-waste collection and recycling facilities to ensure environmentally sound management of obsolete electronic equipment and batteries.
- ***Promote Sustainable Procurement and Capacity Building:*** Procure durable, energy-efficient equipment and train relevant staff in e-waste management and EPR implementation.

INSHAMAKE YA RAPORO KU ISUZUMA RY'INGARUKA Z'UMUSHINGA KU BIDUKIKIJE

Iyi raporo igaragaza **Isuzuma ry'Ingaruka ku Bidukikije n'Imibereho Myiza (ESSA) mu mushinga wa Gahunda y'u Rwanda y'Ubwikorezi Burambye kandi Buhuriweho (RISTP).**

Hagendewe kuri Gahunda ya Kabiri y'Igihugu yo Kwihutisha Iterambere (NST-2, 2024–2029) na Gahunda y'Ingamba z'Urwego rw'Ubwikorezi (TSSP), Guverinoma y'u Rwanda iri gushora imari mu bwikorezi bugezweho, butekanye, bukora neza kandi buhangana n'imihindagurikire y'ikirere, hagamijwe kwihutisha impinduka m'ubukungu, kongera ihuzabikorwa ry'akarere, no guteza imbere iterambere ridaheza kandi rirambye. Mu gushyigikira iyi gahunda, Guverinoma, ibinyujije muri Minisiteri y'Imari n'Igenamigambi (MINECOFIN) na Minisiteri y'Ibikorwa Remezo (MININFRA), yasabye inguzanyo ya miliyoni 200 z'amadolari ya Amerika muri Banki ya Aziya Ishinzwe Ishoramari mu Bikorwa Remezo (AIIB) kugira ngo itere inkunga umushinga wa **Gahunda y'u Rwanda y'Ubwikorezi Burambye kandi Buhuriweho** (RISTP) hagendewe ku bipimo byagenzuwe (RBP).

Ingano, intego n'ibice by'ingenzi by'umushinga RBP*:** RISTP ni gahunda y'imyaka itatu ikorerwa mu gihugu hose (2026–2029) igamije ***kunoza umutekano, kubungabunga n'ubudahangarwa ku mihindagurikire y'ikirere bw'imihanda y'ingenzi n'ibibuga by'indege, ari nako ishimangira ubushobozi bw'inzego mu micungire irambye y'urwego rw'ubwikorezi. Gahunda igizwe n'ibice bitatu: **(i) Ibikorwa Remezo by'Imihanda (70%)**, bishyirwa mu bikorwa n'Ikigo k'Igihugu gishinzwe Iterambere rya Taransiporo (RTDA), bikubiyemo kubungabunga no gusana hafi km 1,500 z'imihanda y'igihugu na km 500 z'imihanda y'imigenderano kugira ngo hatezwe imbere ubuhahirane, ubucuruzi n'ibyoherezwa mu mahanga; **(ii) Ibikorwa Remezo by'Ibibuga by'Indege n'Ivugururwa ryabyo (25%)**, bishyirwa mu bikorwa na Aviation Travel and Logistic Holding Ltd (ATL) na Rwanda Airports Company (RAC), byibanda ku kunoza umutekano w'ibibuga by'indege, kubungabunga umutekano w'indege, ibikorwa byo kugabanya imyuka ihumanya, no guhugura abakozi; na **(iii) Kubaka Ubushobozi bw'Inzego (5%)**, bishyirwa mu bikorwa na MININFRA, kugira ngo hashimangirwe igenamigambi, ihuzabikorwa, igenzura n'ubushobozi bwa tekiniki mu rwego rw'ubwikorezi binyuze mu mahugurwa, inyigo za tekiniki n'amavugurura y'inzego.

Inzego n'imikorere mu Gushyira umushinga RBP mu bikorwa: RBP izagenzurwa na Komite Nyobozi igizwe na MINECOFIN, MININFRA, RTDA na ATL, ikazajya ireberera umushinga, itanga n'ubujyanama. MININFRA, ibinyujije mu Ishami by"Ubwikorezi ryayo, izahuza ishyirwa mu bikorwa rusange rya RBP, harimo gukurikirana no gusuzuma, guhuza inzego zishyira mu bikorwa umushinga, no kugenzura ibipimo bifitanye isano n'itangwa ry'amafaranga (DLIs). Inshingano zo gushyira mu bikorwa zigabanyijwe mu nzego eshatu: RTDA izashyira mu bikorwa igice cy'ibikorwa remezo by'imihanda, ATL igice cy'ibikorwa remezo by'ibibuga by'indege n'ivugururwa ryabyo, naho MININFRA igice cyo kubaka ubushobozi bw'inzego. Ihuzabikorwa

rya buri munsi, raporo no gukurikirana imikorere y'umushinga bizakorwa n'Ishami ryo gushyira mu bikorwa umushinga (PIU) riri mu Ishami ry'Ubwikorezi.

Intego y'Isuzuma ry'Ingaruka ku Bidukikije n'Imibereho Myiza (ESSA): Mu rwego rwo gutegura umushinga (RBP), AIIB ikora **Isuzuma ry'Ingaruka ku Bidukikije n'Imibereho Myiza (ESSA)** kugira ngo irebe niba amategeko, amabwiriza n'inzego z'igihugu gihabwa inguzanyo (u Rwanda) bifite ubushobozi buhagije bwo gucunga no guhangana n'ingaruka mbi ku bidukikije n'imibereho myiza zishobora kugaragara mu gihe cyo gushyira mu bikorwa umushinga. Ibi ni ingenzi kuko, mu buryo bw'inkunga ya RBP, ishyirwa mu bikorwa rya gahunda **rishingira ku mategeko, politiki n'inzego by'igihugu gihabwa inguzanyo aho gushingira ku ikoreshwa ritaziguye ry'Urwego rwa AIIB rw'Ibidukikije n'Imibereho Myiza**.

ESSA yakozwe nk'igice cy'ubugenzuzi bwimbitse bwa AIIB kuri RBP, hagamijwe gusuzuma niba amategeko, amabwiriza n'inzego z'u Rwanda bifite ubushobozi buhagije bwo gucunga ingaruka mbi ku bidukikije n'imibereho myiza (E&S) z'uyu mushinga. Isuzuma ryagenzuye uko ingamba z'igihugu cy'u Rwanda zihura n'Amahame arindwi y'Ibanze ya AIIB agenga Ibidukikije n'Imibereho Myiza mu mishanga ishingiye ku bipimo, rigaragaza ingaruka zishoboka ku bidukikije n'imibereho myiza n'ibyuho mu bushobozi bw'inzego, kandi risuzuma ubushobozi bw'inzego z'ingenzi zishyira mu bikorwa n'izigenzura bwo gucunga neza ishyirwa mu bikorwa ry'umushinga RBP.

ESSA yanagenzuye gahunda yagutse ya Guverinoma mu rwego rw'ubwikorezi kugira ngo igene aho umushinga RBP ugarukira, ikuramo ibikorwa bishobora kugira ingaruka mbi zikomeye ku bidukikije n'imibereho myiza. Hashingiwe ku byavuye mu isuzuma, ESSA itanga inama ku ngamba zo gushimangira ingamba z'igihugu binyuze muri Gahunda y'Ibikorwa by'Ibidukikije n'Imibereho Myiza (ES-PAP), hagamijwe gushyigikira. gucunga no kugenzura ingaruka no kubahiriza ibisabwa mu gihe cyose cyo gushyira umushinga mu bikorwa.

Uburyo ESSA yakoresheje: ESSA yakozwe hakoreshejwe ***uburyo buteguye kandi bushingiye ku biganiro, guhuza isesengura ry'inyandiko, gusura ahazashyirwa ibikorwa, ibiganiro byimbitse n'inama nyunguranabitekerezo n'abafatanyabikorwa, isesengura ry'ingamba zihari, igereranya, n'iyemezwa n'abafatanyabikorwa.*** Isuzuma ryasuzumye inyandiko za RBP n'amategeko, amabwiriza n'inzego z'u Rwanda; risuzuma ingaruka mbi ku bidukikije n'imibereho myiza z'ibikorwa biteganyijwe muri RBP; risuzuma ubushobozi bw'inzego zishyira mu bikorwa n'izigenzura; kandi rigereranya ingamba z'igihugu cy'u Rwanda n'Amahame arindwi y'Ibanze ya AIIB agenga Ibidukikije n'Imibereho Myiza muri Gahunda Zishingiye ku Bisubizo (RBP).

*Isesengura ry'**Imbaraga, Intege nke, Amahirwe n'Ibibangamira (SWOT) umushinga*** ryakoreshejwe kugira ngo hagaragazwe ibyuho mu mategeko, mu nzego no mu mikorere, hasuzumwe ubushobozi bw'inzego, kandi hatangwe inama ku ngamba zo kunoza imikorere n'inshingano byo gushyira mu bikorwa. Isuzuma ryanasuzumye amasomo yavuye mu bikorwa byabanje by'Inkunga Ishingiye ku Bisubizo (RBF) byashyigikiwe na Banki Nyinshi z'Iterambere

(MDBs), harimo Banki y'Isi, kugira ngo hamenyekane imikorere myiza no gusuzuma ishyirwa mu bikorwa rya Gahunda z'Ibikorwa by'Ibidukikije n'Imibereho Myiza (ES-PAPs). Hashingiwe ku mbaraga n'ibyuho byagaragajwe, ESSA yateguye Gahunda y'Ibikorwa by'Ibidukikije n'Imibereho Myiza (ES-PAP) igamije gushimangira ingamba z'igihugu no kunoza imicungire y'ingaruka ku bidukikije n'imibereho myiza mu gihe cyo gushyira mu bikorwa umushinga. Ibyavuye mu isuzuma ry'agateganyo bizatangazwa kandi byemezwe binyuze mu mahugurwa ahuza abafatanyabikorwa, kandi ibitekerezo by'abafatanyabikorwa byashyizwe muri raporo ya nyuma kuwa 8 Nyakanga 2026.

Inshamake y'Isuzuma ry'ingaruka ku bidukikije n'Imibereho Myiza: Iby'ingenzi byavuye muri ESSA byegeranyijwe mu nshamake ni ibi bikurikira:

Inyungu n'Ingaruka zishoboka ku Bidukikije, Imibereho Myiza n'Ubukungu bya RBP iteganyijwe

Inyungu: RISTP iteganyijwe ko izatanga inyungu zikomeye ku bukungu n'imibereho myiza binyuze mu kunoza ubuhahirane bw'akarere n'iry'icyaro, koroshya ubucuruzi no kohereza ibicuruzwa mu mahanga, koroshya uburyo bwo kugera ku masoko na serivisi z'ibanze, gushimangira ubudahangarwa ku mihindagurikire y'ikirere, gushyigikira no guteza imbere ubukerarugendo, no kunoza umutekano w'ibibuga by'indege n'imikorere yabyo. Ishoramari mu bibuga by'indege byo mu turere ryagura inyungu z'umushinga zikagera no hanze ya Kigali, rikanashyigikira iterambere rirambye ry'uturere. Kuvugurura Ikibuga cy'Indege cya Musanze bizanoza uburyo bwo kugera mu karere k'ubukerarugendo ka Pariki y'Igihugu y'Ibirunga, biteze imbere ubukerarugendo, ubucuruzi n'iterambere ry'ubukungu bw'akarere, kandi bishimangire ihuzabikorwa hagati ya Kigali n'Amajyaruguru y'u Rwanda. Kuzamura Urwego rwa Serivisi z'Ubutabazi no Kurwanya Inkongi (RFFS) ku Kibuga cy'Indege cya Kamembe kuva ku Cyiciro cya 6 kugera ku cya 7 bizongera umutekano w'iki kibuga cy'indege, bitume indege nini zishobora kuhakorera, kandi bishyigikire kwiyongera kw'abagenzi, ubucuruzi n'ishoramari mu Ntara y'Iburengerazuba. Iri shoramari rizashimangira imikorere y'ibibuga by'indege by'igihugu, anoze ihuzabikorwa imbere mu gihugu no ku rwego mpuzamahanga, ateze imbere ubukerarugendo n'ubucuruzi, kandi ashimangire uruhare rw'u Rwanda nk'ihuriro ry'ubwikorezi mu karere.

Ingaruka zitezwe ku Bidukikije n'Imibereho Myiza z'Ibikorwa Biteganyijwe: ESSA yasanze ingaruka za RBP ku bidukikije n'imibereho myiza muri rusange ari ***izicririritse, zibera ahantu runaka, zishobora guteganywa kandi zishobora gucungwa, kuko ibikorwa byinshi byo ku mihanda bijyanye no kubungabunga no gusana mu mihanda isanzwe ihari, naho ibikorwa byo ku bibuga by'indege bikaba bigarukira ku nyubako n'ibikorwaremezo bihasanzwe.*** Ingaruka nyamukuru ku bidukikije zijyanye n'**imirimo yo ku mihanda** zirimo isuri y'ubutaka, kwiyongera kw'imyanda itwarwa n'amazi, ihumana ry'umwuka n'urusaku, itenguka ry'imikingo n'imisozi, imyanda ituruka ku mirimo iri gukorwa, ingaruka ku masoko y'amazi n'ibinyabuzima, n'ibyago bifitanye isano n'imihindagurikire y'ikirere. Ingaruka ku buzima n'umutekano by'abakozi zirimo guhura n'imashini ziremereye, urujya n'uruza rw'ibinyabiziga, ibikoresho bishobora guteza

ibyago, ivumbi, urusaku, n'ahantu hakorerwa hadatekanye. Ingaruka ku mibereho myiza zirimo kwimura abantu ku gipimo gito, impungenge ku buzima n'umutekano by'abaturage, umurimo n'imiterere y'akazi, ihohoterwa rishingiye ku gitsina (GBV), gukoresha umuntu mu buryo bushingiye ku gitsina no kumufata nabi/guhohotera umuntu bishingiye ku gitsina (SEA/SH), kurengera abana, n'uburyo bungana bwo kugera ku mahugurwa.

ESSA yasuzumye ishoramari riteganyijwe mu bibuga by'indege, rikubiyemo kugura imodoka zikoresha amashanyarazi, sisitemu z'ikoranabuhanga zo gucunga ibibuga by'indege n'umutekano, ibikoresho byo gutabara byihutirwa, n'amahugurwa y'abakozi hagamijwe kongera imikorere myiza, umutekano n'uburinzi. Umushinga uzanazamura Serivisi z'Ubutabazi no Kurwanya Inkongi (RFFS) ku Kibuga cy'Indege cya Kamembe kuva ku Cyiciro cya 6 cya ICAO kugera ku Cyiciro cya 7 binyuze mu kugura imodoka ebyiri z'ubutabazi no kurwanya inkongi. Kubera ko ibi bikorwa bigarukira cyane cyane ku kugura no gushyira ibikoresho aho bikenewe aho kuba imirimo minini y'ubwubatsi, ntihateganyijwe ingaruka zikomeye ku bidukikije n'imibereho myiza. Ingaruka nyamukuru ku bidukikije ijyanye no guteza imyanda y'ikoranabuhanga n'imyanda ishobora guteza ibyago, harimo ibikoresho by'ikoranabuhanga bishaje n'amabateri y'imodoka zikoresha amashanyarazi, bizasaba gucungwa no kujugunywa mu buryo bukwiye.

ESSA isoza ivuga ko izi ngaruka zishobora gucungwa neza binyuze mu isuzuma ry'ibidukikije n'imibereho myiza, gushyira mu bikorwa no gutegura ibikoresho byihariye byo gucunga ibidukikije n'imibereho myiza kuri buri site y'umushinga, gushyira ibisabwa ku bidukikije n'imibereho myiza mu masoko no mu masezerano, kuganira n'abafatanyabikorwa, gushyiraho uburyo bworoshye bwo kwakira no gukemura ibibazo, guteza imbere ubushobozi bw'inzego, gukurikirana no kugenzura neza ishyirwa mu bikorwa by'umuashinga hitawe ku kubungabunga ibidukikije. Ingaruka ku bidukikije zituruka ku myanda y'ikoranabuhanga n'imyanda ishobora guteza ibyago zishobora kurushaho kugabanywa binyuze mu gukurikiza amabwiriza yagutse y'Uwayikoze (EPR) kugira ngo hamenyekane neza ikusanywa, itunganywa rishya, n'ijugunywa ry'ibikoresho by'ikoranabuhanga bishaje n'amabateri y'imodoka zikoresha amashanyarazi mu buryo butangiza ibidukikije. Hakurikijwe ibipimo byemeranyijweho byo gukumira ibikorwa bitemewe, ibikorwa bishobora kugira ingaruka mbi zikomeye ku bidukikije n'imibereho myiza ntibizemererwa guterwa inkunga muri RBP.

Imiterere y'Amategeko na Politiki y'u Rwanda: ESSA yasuzumye ingamba z'u Rwanda zo gucunga ibidukikije n'imibereho myiza (E&S) izigereranya n'Amahame arindwi y'Ibanze ya AIIB agenga Ibidukikije n'Imibereho Myiza muri Gahunda Zishingiye ku Bisubizo (RBP). Isuzuma ryasanze u Rwanda rufite urwego rwuzuye rw'amategeko, politiki n'inzego zishobora gucunga ingaruka ku bidukikije, ubuzima n'umutekano by'abakozi (OHS), umurimo, n'imibereho myiza bifitanye isano n'umushinga uteganyijwe. Ingamba z'igihugu zishyigikiwe n'inzego kandi zimaze gushingwa neza, harimo Ikigo cy'Igihugu cyo Kubungabunga Ibidukikije (REMA), Ikigo cy'Igihugu cy'Iterambere (RDB), Ishami Rishinzwe Ubugenzuzi bw'Umurimo mu Rwanda (RLI), Polisi y'u Rwanda (RNP), Ubushinjacyaha Bukuru (NPPA), Komisiyo y'Igihugu

y'Uburenganzira bwa Muntu (NCHR), n'Urwego rw'Igihugu rw'Ubwiteganyirize mu Rwanda (RSSB), zifatanyiriza hamwe mu igenzura ry'amabwiriza, gukurikirana iyubahirizwa ryayo, kurengera umurimo, gukemura ibibazo, no kubahiriza amategeko. ESSA yasuzumye amategeko y'igihugu arenga 17, hamwe na politiki, n'amabwiriza ngenderwaho bireba, kugira ngo irebe niba urwego rw'amategeko n'inzego by'u Rwanda bihagije mu gushyira mu bikorwa umushinga (RBP).

Ubushobozi bw'Inzego Zishyira RBP mu Bikorwa: Muri rusange, inzego zishyira mu bikorwa zifite inshingano zisobanutse neza kandi zifite uburambe mu gushyira mu bikorwa imishinga y'ibikorwa remezo, harimo n'iterwa inkunga na banki mpuzamahanga z'iterambere. Icyakora, ubushobozi bw'inzego bwo gucunga ingaruka ku bidukikije n'imibereho myiza buratandukanye bitewe n'urwego.

***Minisiteri y'Ibikorwa Remezo**:* Minisiteri ifite uburambe mu guhuza gahunda ziterwa inkunga n'abaterankunga no kwita kubijyanye n'ibidukikije n'imibereho myiza hifashishijwe inzobere mu kurengera ibidukikije n'imibereho myiza zashyizweho ku mishinga yihariye, ariko nta Shami Rikuru ryihariye ry'Ibidukikije n'Imibereho Myiza ifite, kandi nta buryo bwo kwakira no gukemura ibibazo ku rwego rwa minisiteri. Kubera uruhare rwayo mu gushyira mu bikorwa igice cy'umushinga RBP kijyanye no kubaka ubushobozi bw'inzego, ESSA isaba gushyiraho uburyo bwo kwakira no gukemura ibibazo ndetse no kongera gushimangira ubushobozi mu micungire y'ibidukikije n'imibereho myiza. MINECOFIN ikora igenzura rusange ry'imikoreshereze y'amafaranga, no guhuza abafatanyabikorwa mu iterambere, harimo no kwinjiza ibijyanye n'ibidukikije n'imibereho myiza mu igenamigambi n'ingengo y'imari by'igihugu.

Ikigo cy'Igihugu gishinzwe Iterambere rya Taransiporo (RTDA): RTDA ifite ingamba n'imironko bihamye byo kurengera ibidukikije n'imibereho myiza, uburambe bunini mu gushyira mu bikorwa imishinga y'ibikorwa remezo iterwa inkunga n'abafatanyabikorwa mu iterambere, ndetse n'uburyo bukora bwo kwakira no gukemura ibibazo. Icyakora, kwiyongera kw'imishinga y'imihanda mu nshingano zayo byongereye umutwaro ku bushobozi bwayo bwo kurengera ibidukikije n'imibereho myiza, bigaragaza ko hakenewe abandi bakozi bashinzwe ibidukikije n'imibereho myiza, gushimangira igenzura ry'ubuzima n'umutekano ku kazi (OHS), no kubaka ubushobozi mu ishyirwa mu bikorwa rya Gahunda Ishingiye ku Bisubizo (RBP).

Aviation Travel and Logistics Holding Ltd (ATL). ESSA yasanze ATL ifite uburambe buke mu gucunga ibisabwa ku bidukikije n'imibereho myiza mu mishinga iterwa inkunga na banki mpuzamahanga z'iterambere. Kugira ngo ubushobozi bwayo bushimangirwe, ESSA isaba gushyiraho abakozi bihariye bashinzwe kurengera ibidukikije n'imibereho myiza, gushyiraho uburyo bwo kuganira n'abafatanyabikorwa, kwakira no gukemura ibibazo, kwinjiza ibisabwa ku bidukikije n'imibereho myiza mu masoko no mu micungire y'amasezerano, gushyira mu bikorwa ingamba zo gukumira ingaruka za SEA/SH, no gukoresha sisitemu mpuzamahanga zemewe zo kubungabunga ibidukikije, ubuzima n'umutekano ku kazi.

Ikigo cy'Igihugu cyo Kubungabunga Ibidukikije (REMA): ESSA yasanze REMA ifite inshingano zikomeye zishingiye ku mategeko n'ubushobozi bwa tekiniki bwo kugenzura, gukurikirana no gushyira mu bikorwa iyubahirizwa ryo kubungabunga ibidukikije. REMA ireberera isuzuma mu kubungabunga ibidukikije, gukurikirana iyubahirizwa, ubugenzuzi bw'ibidukikije, igenzura ry'ahakorerwa ibikorwa, n'ubujyanama bwa tekiniki ku nzego zishyira mu bikorwa, ari nako ikorana n'inzego zegerejwe abaturage mu gushimangira imiyoborere y'ibidukikije.

Icyakora, isuzuma ryagaragaje imbogamizi z'ubushobozi zijyanye n'umubare muto w'abakozi, ingengo y'imari idahagije, ibikoresho byo gukurikirana ibidukikije bidahagije, n'ubumenyi buke mu by'ingaruka ku mibereho myiza, bikagira ingaruka ku gukurikirana iyubahirizwa ry'amategeko mu gihugu hose. REMA yanagaragaje ko hakenewe gushimangira ihuzabikorwa ry'inzego, gukurikirana nyuma y'ubwubatsi iyubahirizwa ry'amabwiriza, igenzura ku rwego rw'uturere, na gahunda z'ikoranabuhanga zo gukurikirana. Mu gushyigikira RBP, REMA izatanga ubujyanama bwa tekiniki, gukurikirana iyubahirizwa, ubugenzuzi bw'ibidukikije, no kubaka ubushobozi kugira ngo hashyirwe mu bikorwa neza Gahunda zo Gucunga Ibidukikije n'Imibereho Myiza (ESMPs) kandi hubahirizwe ibisabwa n'amategeko y'igihugu ku bidukikije.

Ikigo cy'Igihugu cy'Iterambere (RDB): ESSA yasanze RDB ifite uruhare rw'ingenzi mu micungire y'ingaruka ku bidukikije n'imibereho myiza binyuze mu guhuza isuzuma no kwemeza Isuzuma ry'Ingaruka ku Bidukikije n'Imibereho Myiza (ESIAs), gutanga ibyemezo by'ibidukikije, no kugenzura iyubahirizwa binyuze muri One-Stop Centre yayo ifatanyije na REMA n'izindi nzego z'imirimo. RDB igenzura kubungabunga urusobe rw'ibinyabuzima kandi igira uruhare rukomeye mu gusuzuma imishinga mito yose ihereye imbere cyangwa hafi y'uduce turinzwe.

Icyakora, isuzuma ryagaragaje imbogamizi zikomeye z'ubushobozi mu Ishami rya ESIA, harimo abakozi badahagije n'icyifuzo cyo kongera ubushobozi bwa tekiniki kugira ngo risuzume neza umubare ugenda wiyongera w'imishinga y'ibikorwa remezo. ESSA isaba kongera abakozi n'ubushobozi bwa tekiniki muri RDB kugira ngo hongerwe ireme n'igihe gikwiye cyo gusuzuma ESIAs no kugenzura iyubahirizwa ry'ibidukikije mu gihe cyo gushyira umushinga mu bikorwa.

Ishami Rishinzwe Ubugenzuzi bw'Umurimo mu Rwanda (RLI): ESSA yasanze Ishami Rishinzwe Ubugenzuzi bw'Umurimo mu Rwanda, rikorera muri Minisiteri y'Abakozi ba Leta n'Umurimo (MIFOTRA), rifite inshingano zikomeye zishingiye ku mategeko zo gushyira mu bikorwa amategeko y'umurimo n'ibipimo by'ubuzima n'umutekano ku kazi (OHS) binyuze mu igenzura ry'ahakorerwa, ipererezа ku mpanuka, gukurikirana iyubahirizwa, n'ubujyanama bwa tekiniki. RLI yagize uruhare rukomeye mu gushyigikira imishinga y'ibikorwa remezo binyuze mu guteza imbere iyubahirizwa rya OHS no gushimangira umutekano ku kazi.

Icyakora, isuzuma ryagaragaje imbogamizi z'ubushobozi, harimo umubare udahagije w'abagenzuzi b'umurimo, ingengo y'imari idahagije, n'ibisabwa bigenda byiyongera bitewe no

kwaguka kw'imishinga y'ibikorwa remezo. ESSA isaba kongera ubushobozi bw'inzego za RLI binyuze mu kongera abakozi, amahugurwa yihariye, kunoza gahunda z'igenzura na raporo, gushimangira iyubahirizwa ry'uburenganzira bw'abakora imirimo, no kurushaho gukorana n'inzego zishyira mu bikorwa kugira ngo hagenzurwe neza OHS mu gihe cyo gushyira umushinga mu bikorwa.

Isuzuma Rihuriweho ry'Ingaruka: ESSA yanzuye ko RBP iteganyijwe ifite **ingaruka rusange ziri hasi kugeza ku rugero rucirirtse ku bidukikije n'imibereho myiza**. Kubera ko imirimo iteganyijwe ku mihanda no ku bibuga by'indege izakorerwa mu mihanda isanzwe no mu mbibi z'ibibuga by'indege bihasanzwe, ingaruka zitezwe ko zizaba iz'ahantu runaka, z'igihe gito, kandi zishobora gucungwa binyuze mu ngamba zisanzwe zo kugabanya ingaruka ku bidukikije n'imibereho myiza. Ingaruka z'ingenzi zirimo isuri y'ubutaka, guhungabana kw'imiyoboro y'amazi, ihumana ry'umwuka, ubuzima n'umutekano ku kazi no mu baturage, n'ibyago bifitanye isano n'imihindagurikire y'ikirere, cyane cyane mu bice byitaweho mu bijyanye n'ibidukikije no mu misozi. Gufata ubutaka no kwimura abantu ku gipimo gito na byo bishobora kubaho aho kwagura umuhanda, guhindura icyerekezo cyawo, cyangwa kunoza imiyoboro y'amazi bikenewe, kandi bizacungwa binyuze mu ngamba zikwiye z'indishyi no kwimura abantu.

Gahunda y'Ibikorwa by'umushinga: Kugira ngo hakemurwe ingaruka ku bidukikije n'imibereho myiza (E&S), ingaruka mbi, n'ibyuho byagaragajwe, ESSA ya RBP yatanze urutonde rw'ingamba zikwiye zo kugabanya ingaruka no kongera ubushobozi zizashyirwa mu bikorwa mu gihe cyose cyo gushyira RBP mu bikorwa. Izi ngamba zigize igice cya **Gahunda y'iteganyabikorwa (PAP)**, izayobora ibikorwa bigomba gukorwa mbere no mu gihe cyo gushyira umushinga mu bikorwa (Imbonerahamwe ya 3).

A. Ingamba zo Kugabanya Ingaruka ku Bidukikije, Imibereho Myiza, Ubuzima n'Umutekano ku Kazi zijyanye n'Imirimo y'Imihanda

- Gutanga Gahunda y'Ibikorwa n'Ingengo y'Imari ya Buri Mwaka (AWPB) kuri AIIB kugira ngo isuzumwe kandi yemezwe, hagamijwe kwirinda gushyiramo ibikorwa byo mu Cyiciro A n'ibindi bikorwa by'ingaruka nyinshi bitemewe.
- Gutegura inyandiko z'umushinga na ESMPs zihariye kuri buri site ya buri mushinga muto w'umuhanda kugira ngo hamenyekane kandi hacungwe ingaruka ku bidukikije, imibereho myiza, OHS, n'umutekano.
- Gusuzuma imishinga mito yose kugira ngo hakurwemo ibikorwa byo mu Cyiciro 'A' n'ibindi by'ingaruka nyinshi hakurikijwe gahunda y'u Rwanda yo gusuzuma, ibisabwa bya EIA, n'ibisabwa bya AIIB kuri RBP.
- Kongera ubushobozi bwo gucunga ibidukikije, imibereho myiza, n'OHS: Kwinjiza ibisabwa ku bidukikije, imibereho myiza, umurimo, ubuzima n'umutekano ku kazi (OHS), n'ubuzima n'umutekano by'abaturage mu nyandiko z'amasoko n'amasezerano; kugena abakozi bihariye bashinzwe ibidukikije n'imibereho myiza by'umushinga RBP muri RTDA; kugena ingengo y'imari n'abakozi bihagije mu ishyirwa mu bikorwa; no gutanga amahugurwa ahoraho ku bisabwa ku bidukikije, imibereho myiza, umurimo, OHS, ubuzima n'umutekano by'abaturage.

- Gushimangira no gukurikirana iyubahirizwa n'ihuzabikorwa hagati y'Inzego. Gushyiraho gahunda zikomeye zo gukurikirana no gutanga raporo ku iyubahirizwa ry'abakora imirimo, harimo igenzura rihoraho ry'ahakorerwa imirimo, raporo ku byabaye, ibikorwa byo gukosora, no kurushaho guhuza RTDA, abagenzuzi b'umurimo, n'izindi nzego z'ubugenzuzi bireba kugira ngo hatezwe imbere igenzura, ishyirwa mu bikorwa ry'amabwiriza, n'ipererezа ku mpanuka.
- Gushimangira imicungire y'ibidukikije n'umutekano wo mu muhanda mu duce turinzwe. Kongera igenzura ry'ibikorwa by'ubwubatsi biri imbere cyangwa hafi y'uduce tubungabunzwe binyuze mu igenzura rihuriweho n'inzego nyinshi, gushyira mu bikorwa ingamba z'abakora imirimo zo gucunga ibidukikije, gushimangira imicungire y'urujya n'uruza, gushyira mu bikorwa umuvuduko ntarengwa, gushyiraho ibikorwa remezo bikwiye by'umutekano wo mu muhanda (harimo ibyapa, kamera zipima umuvuduko, n'ingamba zo kugabanya umuvuduko), no gukorana n'abatwara abantu n'ibintu ndetse n'abayobozi b'amapariki kugira ngo harengerwe urusobe rw'ibinyabuzima kandi hongerwe umutekano w'abasura n'inyamaswa zo mu gasozi.
- Gushimangira ingamba zo kurengera ibidukikije mu duce tubungabuzwe binyuze mu kongera igenzura, kugenzura umuvuduko, gushyiraho ibyapa, gushyira mu bikorwa amategeko, no gukangurira abaturage kubungabunga ibidukikije.
- Gushimangira igenamigambi ryo gufata ubutaka binyuze mu gusuzuma hakiri kare imishinga mito kugira ngo hamenyekane ingaruka zishobora guterwa no kwimura abantu, gusuzuma vuba ibisabwa by'inyongera bituruka ku mpinduka z'igishushanyo mbonera cy'umushinga, no kwemeza ko ingengo y'imari ihagije, harimo n'amafaranga y'ingoboka, iteganywa kugira ngo indishyi zitangwe ku gihe kandi ingamba zo kwimura abantu zishyirwe mu bikorwa.
- Minisiteri y'Ibikorwa Remezo igomba gushyiraho uburyo buboneye kandi budaheza bwo gusaranganya inyungu z'umushinga zijyanye no kubaka ubushobozi n'amahugurwa mu nzego z'urwego rw'ubwikorezi.

B. Ingamba zo kugabanya ingaruka zituruka ku myanda y'Ikoranabuhanga n'izindi ngaruka zijyanye no kugura Ibikoresho by'Ibibuga by'Indege

Kugira ngo ATL icunge neza ingaruka ku bidukikije zijyanye n'imyanda y'ikoranabuhanga, igomba gushyira mu bikorwa izi ngamba zikurikira:

- Kwinjiza EPR mu Masoko: Gusaba abatanga ibikoresho, aho bishoboka, gushyira mu bikorwa amabwiriza yagutse y'Uwayikoze (EPR), harimo gusubirana, gutunganya bundi bushya, cyangwa kujugunya mu buryo butangiza ibidukikije ibikoresho by'ikoranabuhanga n'amabateri bishaje.
- Gushyiraho uburyo bwo gucunga imyanda y'Ikoranabuhanga: Gutegura no gushyira mu bikorwa uburyo bwo gukusanya, kubika, gufata, gutwara, no kujugunya imyanda y'ikoranabuhanga hakurikijwe amabwiriza y'igihugu n'imikorere myiza mpuzamahanga.
- Gukorana n'abatunganya imyanda y'Ikoranabuhanga bafite impushya: Gukorana n'ibigo bifite impushya zo gukusanya no gutunganya imyanda y'ikoranabuhanga kugira ngo ibikoresho by'ikoranabuhanga n'amabateri bishaje bicungwe mu buryo butangiza ibidukikije. • Guteza

imbere amasoko arambye no kubaka ubushobozi: Kugura ibikoresho biramba kandi bikoresha ingufu nke, no guhugura abakozi ibirebana n'imicungire y'imyanda y'ikoranabuhanga no gushyira mu bikorwa EPR.

1. Introduction

The Republic of Rwanda, is a landlocked country in East-Central Africa known for its scenic highlands and dense population. Often called the *"Land of a Thousand Hills,"* the country covers about 26,338 km² and has an estimated population of 13.2 million people[2], with the projection of 14,748,992 people as of January 1, 2026. Situated just south of the Equator, Rwanda shares borders with Uganda to the north, Tanzania to the east, Burundi to the south, and the Democratic Republic of the Congo to the west. Its landscape ranges from eastern savannas to volcanic mountains in the northwest, including Mount Karisimbi, while Lake Kivu forms part of its western border.

Agriculture remains important to the economy, particularly coffee and tea exports, although services, tourism, and technology are expanding rapidly under the country's long-term development strategy. Rwanda is also renowned for its protected ecosystems, including Volcanoes National Park, Akagera National Park, and Nyungwe National Park, which support biodiversity conservation and ecotourism. This report presents the findings of the Environmental and Social Systems Assessment (ESSA) conducted for the Rwanda Integrated Sustainable Transport Program, with support from the Asian Infrastructure Investment Bank.

1.1. Program Background

The Government of Rwanda (GoR) recognizes the transport sector as a key driver of economic transformation, export competitiveness, climate resilience, and inclusive growth. Efficient transport infrastructure supports productivity in sectors such as agriculture, manufacturing, and tourism by lowering logistics costs, improving access to markets, strengthening regional and international connectivity, and increasing resilience to climate and other external shocks. To this end, the government prepared the Second National Strategy for Transformation (NST-2) (2024–2029) and the Transport Sector Strategic Plan (TSSP) October 2024. The strategy aims to establish a robust multi-modal transport network to reduce transport costs and promote social economic growth. It thus focuses on improving infrastructure and services across roads, aviation, and inland waterways, while strengthening the systems that support transport operations. The aim is to expand transport infrastructure while improving its quality, safety, reliability, and climate resilience in the transport sector.

Within the frameworks of the Second National Strategy for Transformation (NST-2) and the Transport Sector Strategic Plan (TSSP), the Government has outlined several priority actions. These include enhancing public transport services nationwide and reducing urban traffic congestion; upgrading the quality of road networks and trade facilitating infrastructure; promoting environmentally sustainable and climate-resilient transport systems; improving air transport infrastructure and services; and strengthening inland waterway and maritime transport infrastructure and services. This is the overall government program (small "p").

[2] National Institute of Statistics of Rwanda (NISR), fifth Rwanda Population and Housing Census (2022 RPHC)

To support the implementation of the NST-2, the GoR, through the Ministry of Finance and Economic Planning **(MINECOFIN**) and the Ministry of Infrastructure (**MININFRA)**, has requested USD 200 million in financing from the Asian Infrastructure Investment Bank (AIIB) to support the **Rwanda Integrated Sustainable Transport Program (RISTP) to** be implemented through a Results-Based Program (RBP) modality. The initiative aims to improve the safety, efficiency, and climate resilience of key trade corridors and airports, while strengthening institutional capacity in the transport sector. This is the Program (big "P"), to be funded by AIIB loan as part of the overall government program (small "p").

1.2. Objective and Tasks of the Environmental and Social Systems Assessment (ESSA)

The primary objective of the Environmental and Social Systems Assessment (ESSA) was to evaluate Rwanda's capacity to manage environmental and social (E&S) risks and effectively integrate E&S considerations into Program planning, implementation, monitoring, reporting, and oversight, in line with their National Systems[3] for management of E&S risks and impacts and the seven AIIB - RBF Core E&S Principles for RBF operations. The assessment reviewed the adequacy of existing legal, institutional, and regulatory systems, identified gaps and areas requiring improvement, and proposed measures to strengthen E&S management through the Program Action Plan (PAP). It also examined potential direct, indirect, induced, and cumulative impacts likely to be associated with the proposed Program activities (big "P") and developed exclusion criteria for activities anticipated to generate significant adverse E&S impacts and risks from the government's parent program (small "p"). In addition, the assessment evaluated the institutional capacity and experience of key implementing agencies, including the Ministry of Infrastructure of Rwanda (MININFRA), Rwanda Transport Development Agency (RTDA), and Rwanda Aviation, Travel and Logistics Holding (ATL), Rwanda Air (RA), Rwanda Airports Company (RAC), and relevant regulatory institutions mandated to oversee E&S matters of the Program such as the Rwanda Environment Management Authority (REMA), Rwanda Labour Inspectorate (RLI), and Rwanda Development Board (RDB).

The ESSA is a key requirement under the Results-Based Program (RBP) financing approach, where disbursement of funds is linked to the achievement of agreed results and implementation relies primarily on the borrower's national systems for managing environmental, social, fiduciary, and procurement aspects. As a result, E&S risks associated with the Program are expected to be addressed through Rwanda's existing legal, policy, and institutional frameworks. In line with the AIIB's Environmental and Social Policy (ESP), the ESSA was undertaken as part of the Bank's due diligence to determine whether Rwanda's systems are adequate to manage E&S risks and

[3] ***National Systems for Management of Environmental and Social Risks in ESSA contexts*** *refers to the laws, regulations, institutions, policies, procedures, and enforcement mechanisms that a country has established to identify, assess, manage, monitor, and mitigate environmental and social risks associated with development projects, investments, policies, and programs.*

impacts associated with the Program prior to its approval and consistent with the seven AIIB-RBF Core E&S Principles.

ESSA Specific Objectives

The ESSA assignment was guided by the following specific objectives:

a) To assess Rwanda's legal, regulatory, institutional, and operational systems for managing environmental, social, and climate-related risks relevant to the overall government program with special attention to the Program.
b) To evaluate the consistency of Rwanda's National Systems with the seven AIIB - RBF Core E&S Principles.
c) To identify key E&S risks and impacts of the government program and to define activities that pose potential high E&S risks and impacts.
d) To screen the proposed RBP activities to determine their environmental, social relevance, and associated risk profile.
e) Establish the Program boundaries through the screening process outlined above, in coordination with the Government and the Project Team, ensuring that activities classified as high environmental and social (E&S) risk are excluded from Program financing and implementation
f) To further identify key E&S risks, potential impacts, institutional capacity gaps, and opportunities of the RBP for strengthening National Systems and implementation arrangements.
g) To evaluate the institutional capacity, experience, and past performance of ministries, agencies, and state-owned enterprises responsible for Program implementation.
h) To recommend practical measures for strengthening E&S management systems and addressing identified gaps through an Environmental and Social Program Action Plan (ES-PAP).
i) To support the integration of environmental and social measures into Disbursement-Linked Indicators (DLIs), Program actions, and relevant legal covenants.
j) To facilitate stakeholder consultations to validate the ESSA report and support disclosure of the ESSA report.
k) To inform the Bank's decision regarding the potential flexibility for extending the RBF arrangement under the RBP, including possible adjustments to the scope, duration, or financing terms based on implementation performance, emerging risks, changing project conditions, and overall Program effectiveness.

2. Overview of the Government Program and Results-Based Financing: Rwanda Integrated Sustainable Transport Program

This section explains the scope of Government Program and Results-Based Financing through the Rwanda Integrated Sustainable Transport Program.

2.1. Government Program

The proposed Results-Based Program (RBP) forms part of the Government of Rwanda's broader development goals under the Second National Strategy for Transformation (NST-2) and the Transport Sector Strategic Plan (TSSP). The Government estimates that approximately USD 1.8 billion will be needed to implement transport sector priorities during the 2024–2029 NST-2 and TSSP period, with about USD 1.36 billion required over the remaining three years. Key planned investments include upgrading and rehabilitating more than 300 km of national roads, maintaining 1,729 km of paved national roads, rehabilitating at least 500 km of feeder roads, and maintaining 4,137 km of feeder roads. The program also aims to improve inland water transport on Lake Kivu and expand both domestic and international passenger and cargo services by strengthening the capacity of RwandAir, establishing an Aviation Skills Academy, and rehabilitating existing aerodromes.

2.2. RBP Scope

The proposed Results-Based Program (RBP) is a three-year program (2026–2029) aligned with NST-2 and the Transport Sector Strategic Plan (TSSP). It focuses on three key areas: (i) improving national and feeder roads to support trade, (ii) strengthening the safety, efficiency, and climate resilience of key airports, and (iii) enhancing institutional capacity in the transport sector.

2.3. RBP Scope and Key Result Areas

Scope: The government program's geographical scope is countrywide (North, south, east and west provinces). The RBP's geographical scope is also countrywide, but it comprises only these three components (not including inland water ways etc.):

a) ***Component 1: Maintenance, Upgrading and Rehabilitation of National and Feeder Road Corridors.*** This component will constitute approximately 70% of the total RBP budget and includes maintenance of about 1,500 km of national roads and around 500 km of feeder roads linked to tea, coffee, and milk production areas to facilitate trade and exports. The component will be implemented by the Rwanda Transport Development Agency (RTDA). Figure 1 indicates the national paved roads under multilayer maintenance.

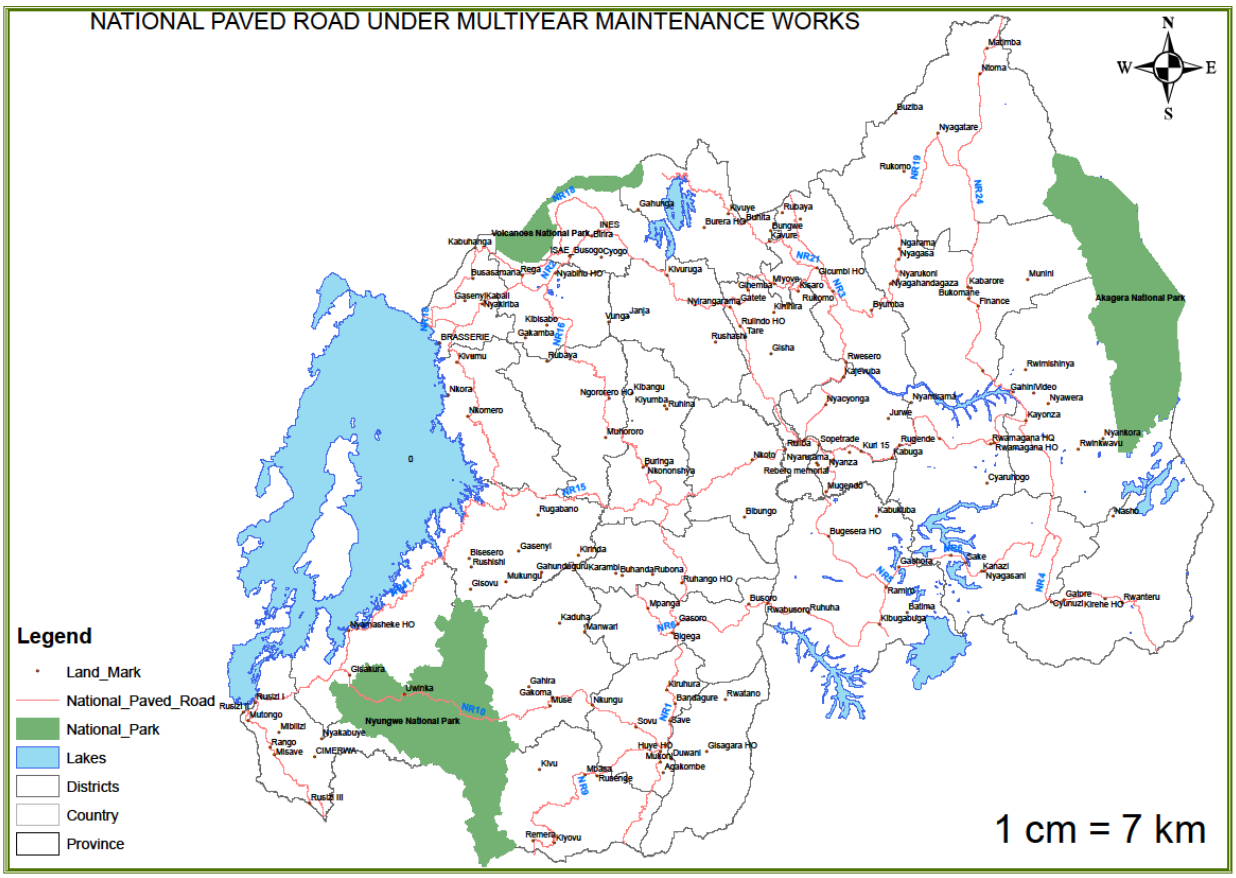


Figure 1: Map of the National Paved Roads under Multilayer Maintenance Works

b) **Rehabilitation and upgrading of key airports**: Activities focus on:

(i) ***Aerodrome Safety***: Rehabilitation of the runway and aprons at Musanze Aerodrome and upgrading the Rescue and Firefighting Services (RFFS) from Category 6 to Category 7 at Kamembe Airport.

(ii) ***Aviation Security Digital Modernization:*** Modernization of security systems at Kigali International Airport and Kamembe Airport through Information Security Management System (ISMS) certification, cybersecurity enhancements, implementation of the Airport Collaborative Decision-Making (A-CDM) system, and adoption of ISO 31000 risk management standards.

(iii) ***Airport Decarbonization:*** Introduction of electric ground support equipment and implementation of the Airport Council International (ACI) Airport Carbon Accreditation Programme at Kigali International Airport.

(iv) ***Aviation Workforce Development:*** Preparation of an aviation workforce development plan and delivery of specialized training and certification programs to strengthen operational capacity and efficiency.

c) ***Institutional Support and Capacity Building in the Transport Sector.*** This component focuses on strengthening sector-wide planning, monitoring, oversight, and institutional coordination across road, aviation, and inland waterway transport, while enhancing the capacity of key transport subsectors. Activities include:

i. ***Cross-sector capacity building:*** Support implementation of the National Transport Policy and Strategy through improved monitoring and evaluation of infrastructure projects, public transport performance assessments, electric mobility adoption, beneficiary impact assessments, and training on environmental, social, climate, and fleet management systems in line with international standards.

ii. ***Aviation sector:*** Strengthen institutional capacity through training in aviation accident and incident investigation, safety management systems, and airport certification in accordance with ICAO Annex 19.

iii. ***Road sector:*** Support studies on road asset management, road safety and accident management, and the feasibility of public-private partnerships for selected road corridors.

iv. ***Climate resilience:*** Strengthen climate risk management by integrating climate risk screening, climate-resilient infrastructure design, and risk-based maintenance planning across all Program investments, with particular attention to flooding, landslides, and erosion.

Note: The RBP boundaries are illustrated in Figure 2.

RBP Beneficiaries: The RBP is expected to benefit a wide range of transport users, including rural and urban communities, passengers, freight operators, and businesses that rely on Rwanda's national roads, feeder roads, and airports. Spatial analysis of the 24 road corridors covered by the Program indicates that approximately 6.4 million people live within 2 km of the roads, increasing to about 11.3 million people within a 5 km catchment, representing approximately 45% and 79% of Rwanda's population, respectively. The Program will improve connectivity, particularly for rural communities, enhance market access for farmers and producers, including women who play a central role in agriculture, and strengthen institutional capacity among government agencies responsible for transport planning, implementation, and oversight

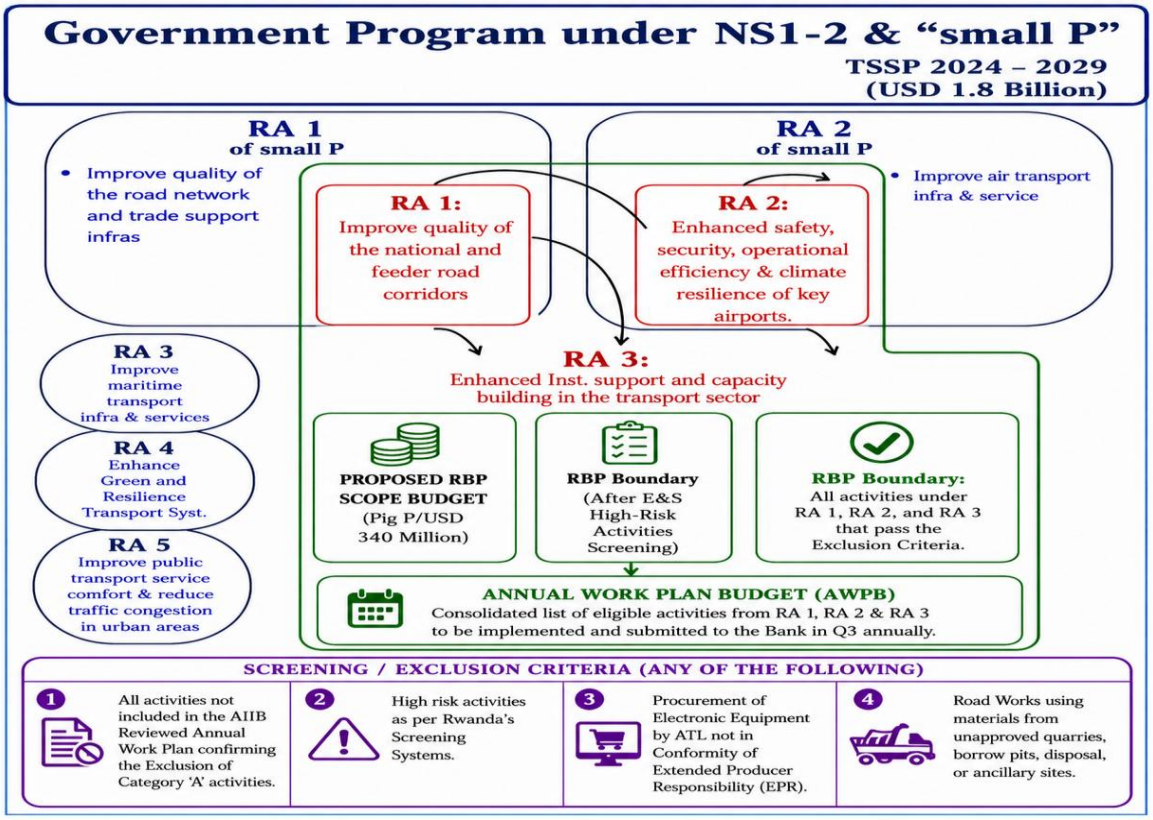


Figure 2: The Result Based Program Boundaries

2.4. RBP Disbursement Linked Indicators

The RBP has 6 disbursement linked indicators (DLIs), which are agreed with RTDA, ATL and MININFRA. These DLIs are designed to be measurable, with verifiable results against which funds will be released from the proposed AIIB loan. The DLIs are:

i. DLI 1: Increase in the kilometers of national roads maintained in good condition to a climate-resilient standard.

ii. DLI 2: Increase in the kilometers of feeder roads maintained in good condition and with all-season access.

iii. DLI 3: Achievement of ICAO safety and security standards and compliances, ISO 27001 standard and alignment with ISO 31000 guidance standard and ACA in selected existing airports in Rwanda.

iv. DLI 4: Adoption of electric GSE in existing airport operations.

v. DLI 5: Aviation workforce personnel trained or certified in key operational areas.

vi. DLI 6: Transport and transport-related staff and professionals trained annually, of which at least 30% are female.

Note: Key capacity building and institutional strengthening activities will be identified during the preparation of the RBP assessments and included in the RBP Action Plan. Some of these activities are also expected to fall under Results Area 3, and may be linked to specific DLIs.

The boundaries, objectives, geographic coverage, costs, results areas, and scope of the NST-2/TSSP and the AIIB-financed RBP are summarized in Table 1 and Figure 2.

Table 1: Result Based Program (RBP) Boundaries

	NST-2/TSSP	Proposed RBP
Objective	To establish a robust multi-modal transport network to reduce transport cost and promote social economic growth.	To improve the safety, efficiency and climate resilience of key trade-oriented road corridors and airports, and enhance the capacity of relevant transport sector institutions to manage the sector.
Geographic Coverage	Across Rwanda	Across Rwanda
Timeline	2024-2029	2026-2029
Program cost	USD1.8 billion (of which USD1.36 billion from 2026-2029)	USD 240 million
Results Area (RA)	• RA 1: Improved quality of the road network and trade-supporting infrastructure • RA 2: Improved air transport infrastructure and services • RA 3: Improved maritime transport infrastructure and services • RA 4: Enhanced green and resilient transport system • RA 5: Improved public transport services countrywide and reduced traffic congestion in urban areas	• RA 1: Improved quality of the national and feeder road corridors • RA 2: Enhanced safety, security, operational efficiency and climate resilience of key airports • RA 3: Enhanced institutional support and capacity building in the transport sector
Scope	• RA 1: upgrade and rehabilitate over 300 km of national roads, maintain 1,729 km of the national paved road network, rehabilitate at least 500 km of feeder roads (from 4,254 km to 4,797 km by 2029), maintain 4,137 km of feeder roads, construct and operationalize one stop border post	• RA 1: maintain about 1,500 km of national road networks, and maintain about 500 km of feeder roads • RA 2: rehabilitate and upgrade key airports • RA 3: provide institutional support and capacity building in the transport sector

	NST-2/TSSP	Proposed RBP
	• RA 2: boost international and domestic passenger and freight services (from 1,021,000 to 2,109,505 passengers and from 8,470 to 32,987 metric tons of cargo), complete and start operationalization of New Kigali International Airport in Bugesera, rehabilitate existing aerodromes, increase RwandAir destinations from 23 to 29, establish Aviation Skills Academy • RA 3: improve and scale up cargo transport services and capacity on Lake Kivu, develop ports along Lake Kivu (Rusizi, Karongi, Nkora in Rutsiro District), install Lake Kivu navigation aids • RA 4: promote and expand electric mobility in public transport, develop public charging for electric vehicles, promote the development of climate resilient transport infrastructure, develop cable car technology in both urban areas, promote nature-based solutions to mitigate climate issues • RA 5: establish 22.6 km of dedicated bus lanes in the City of Kigali, upgrade 9 critical roads intersections, introduce smart traffic management system, increase inter-city scheduled bus services for 14,623 km of roads, modernize bus stops and terminals	

2.5. Implementing Institutional and Arrangements

The proposed RBP will be overseen by a Steering Committee (SC) comprising Ministry of Finance and Economic Planning (MINECOFIN), Ministry of Infrastructure (MININFRA), Rwanda Transport Development Agency (RTDA), and Akagera Aviation Training Limited (ATL). The SC will provide overall oversight and strategic direction for the RBP (Figure 3).

MININFRA, through its Transport Directorate, will coordinate the implementation of the RBP. Its responsibilities will include coordinating data collection, compiling evidence for achievement of DLIs, and supporting the monitoring and evaluation (M&E) of the program. MININFRA will also ensure coordination and consistency across the different transport subsectors supported under the RBP.

The implementation of RBP activities, including planning, design, procurement, execution of works and services, and monitoring of progress, will be carried out by RTDA, ATL, and MININFRA. Results Area 1 will be implemented by RTDA, Results Area 2 by ATL, and Results Area 3 by MININFRA. These implementation arrangements are aligned with the structure of the NST-2 and TSSP.

The Transport Directorate will undertake the overall technical coordination and management of the Program, led by the Director and comprising senior staff from key units within RTDA and ATL. The Head of the PIU will be responsible for the day-to-day supervision of the RBP, coordinating implementation across participating agencies, facilitating data collection, consolidating evidence on the achievement of results and Disbursement-Linked Indicators (DLIs), and supporting monitoring and reporting requirements under the program.

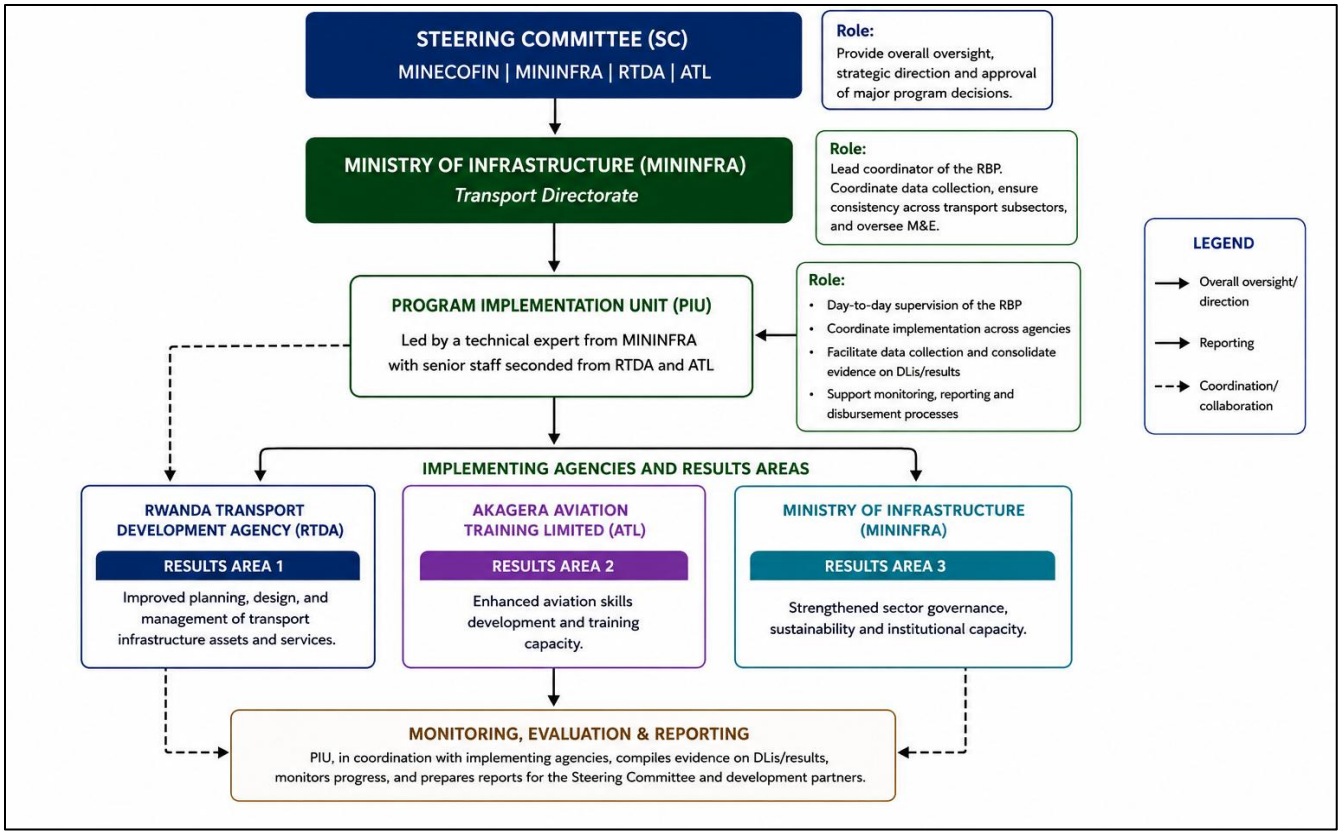


Figure 3: RBP Implementation Arrangement

3. Procedures and Methodologies of the Environmental and Social Systems Assessment

3.1. General Approach

The assignment was undertaken through a combination of desk reviews, field assessments, site visits, and stakeholder consultations (Figure 4. The desk-based review involved content analysis of Program background documents, as well as relevant legal, policy, and institutional frameworks applicable to the RBF Program. Field activities included consultations and engagement with key stakeholders, implementing agencies, and regulatory authorities, together with visits to selected investment sites (roads and airport) to assess E&S conditions. The process also included disclosure and discussion of the assessment findings and recommendations with relevant stakeholders as indicated in Figure 4 below.

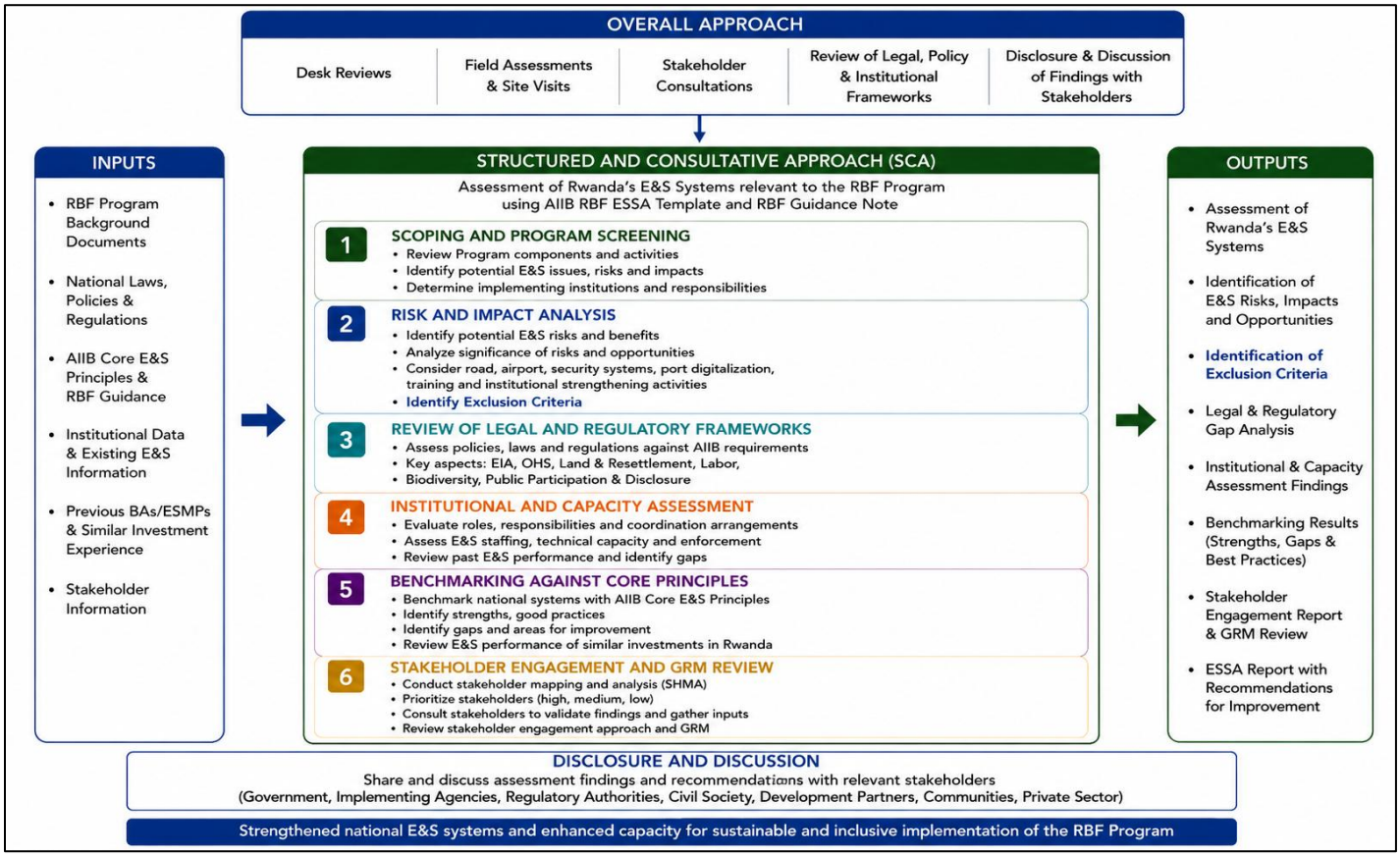


Figure 4: Method followed to prepare Environmental and Social Systems Assessment (ESSA)

3.2. Structured and Consultative Approach (SCA)

A structured and consultative approach (SCA) was adopted in undertaking this ESSA. The approach was used to assess Rwanda's E&S systems relevant to the RBP, including the capacity of implementing institutions to identify, assess, and manage potential E&S risks and impacts, as well as the overall effectiveness of national systems in addressing these risks under the Program. Technical, organizational, human, policy, and legal capacities of relevant institutions to effectively integrate E&S considerations during the preparation and implementation of the Program were evaluated.

The Consultant undertook all tasks required for preparation of the ESSA using the AIIB RBF ESSA Template and the RBF Guidance Note. The assessment ensured that all key ESSA dimensions outlined in the Terms of Reference (ToR) were adequately covered. These dimensions were translated into a set of guiding questions to support systematic analysis and evaluation (Annexes 2.1 to 2.5).

Specific Activities and Task Performed: Specifically, Consultants performed the following specific tasks to complete RBP ESSA:

a) Scoping and Program Screening: This task sought to develop a comprehensive understanding of the proposed overall government program and RBF Program, define its scope, and identify the environmental and social (E&S) issues relevant to the program and supported activities by the RBP. Key activities included:

- ***a.*** Reviewing the overall government program components and activities;
- ***b.*** Identifying potential E&S risks and impacts; and
- ***c.*** Determining the institutions responsible for program implementation.
- d. Define the scope of the RBP Program within the overall government program (RBP boundary after considering exclusion criteria).

b) Risk and Impact Analysis: This task involved identifying the potential environmental and social (E&S) risks and benefits associated with the proposed RBP activities, including road maintenance and rehabilitation, airport resurfacing and safety upgrades, installation of security systems, as well as training and institutional strengthening activities.

c) Review of Legal and Regulatory Frameworks: This task assessed Rwanda's policies, laws, and regulations governing E&S management to determine the extent to which the national systems align with AIIB requirements and international principles. Specifically, the review covered the following aspects:

- Environmental impact assessment requirements, based on the environmental and social risk profile.
- Occupational health and safety.
- Land acquisition and resettlement.

- Labor and working conditions.
- Biodiversity and natural resource protection.
- Public participation and information disclosure.

d) Institutional and Capacity Assessment: As part of the institutional capacity assessment, the Consultants assessed the availability and functionality of Environmental and Social Management Systems within the implementing agencies. The assessment evaluated the roles, responsibilities, and institutional capacity of entities responsible for RBP implementation, including environmental and social staffing, technical capacity, monitoring and reporting, enforcement mechanisms, and coordination arrangements among institutions. In addition, the Consultants reviewed past performance in meeting the Program's E&S requirements in order to identify existing gaps and areas requiring improvement.

e) Benchmarking Against Core Principles: Based on the information gathered, the Consultant benchmarked Rwanda's E&S national systems against the AIIB Core E&S Principles and good international industry practices (GIIP). The benchmarking exercise helped identify areas where the national systems were strong and adequate, as well as gaps and weaknesses requiring further strengthening (see more detailed in Table 3). In addition, the assessment reviewed the environmental and social performance of similar investments implemented in Rwanda.

f) Stakeholder Engagement and GRM Review: The Consultants undertook consultations with relevant stakeholders to validate assessment findings and obtain additional perspectives on the proposed Program. Stakeholders included government institutions, civil society organizations, and private sector actors in the transport sector, affected communities, and development partners. The consultation process was preceded by a Stakeholder Mapping and Analysis (SMA) exercise to identify relevant stakeholders and determine the appropriate level of engagement required. The SMA involved stakeholder identification, categorization, and analysis based on: (i) *the stakeholder's contribution to the proposed RBP; (ii) legitimacy and relevance to the Program, including whether they were directly affected or interested parties; (iii) willingness to participate; (iv) level of influence on Program implementation; and (v) the necessity of their involvement in the assessment process*.

Based on these criteria, stakeholders were prioritized for engagement during the assignment. The stakeholder analysis applied a scoring framework to determine the level of priority for consultation, with stakeholders receiving higher scores given priority, while those with medium and lower scores were considered second and third priorities respectively. Consequently, stakeholder engagement was undertaken proportionately according to the relevance and influence of each stakeholder group as indicated below. Annex 3 presents the list of stakeholders and government officials and institutions consulted during the preparation of this ESSA and during the validation workshop.

g) ***Ascertaining Effective of Grievance Management:*** The assessment evaluated the availability and effectiveness of existing Grievance Redress Mechanisms (GRMs). Particular attention was given to the underlying GRM principles and practices, including the structure and levels of grievance resolution, roles and responsibilities, and the composition of grievance management teams. The review also examined whether the GRMs had clear procedures for submission, receipt, review, and resolution of grievances through accessible channels such as liaison officers, contact points, websites, emails, and feedback boxes. In addition, the assessment considered issues of confidentiality, avoidance of conflicts of interest, and ethical conduct within the GRM system, including specific procedures for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH)-related grievances. The review further examined the maintenance of grievance registers, performance monitoring through key indicators, and the existence of transparent appeal and escalation mechanisms.

h) ***Multilateral Development Banks (MDBs) ESSA Comparative Review Memorandum.*** To ascertain Rwanda's performance under other RBF programs, particularly regarding the implementation of E&S aspects and the execution of proposed Program Action Plans (PAPs), this assessment drew on a review of E&S program completion reports, complemented by discussions with E&S staff from Multilateral Development Banks (MDBs) including World Bank Group. In addition, a validation workshop was conducted to further verify and enrich the findings and the ESSA managed to obtain a written inputs from the World Bank and the Gender Monitoring Office (GMO**).**

3.3. Systems Analysis Approach

The ESSA system analysis was conducted using the ***Strengths, Weaknesses, Opportunities, and Threats (SWOT)*** approach. The assessment examined gaps in both the legal and procedural framework and the capacity of Program institutions to effectively implement E&S management systems. The analysis focused on the strengths, gaps, risks, and potential improvement measures within the existing implementing institutions for managing E&S effects associated with Program operations. It also assessed the effectiveness and efficiency of institutional arrangements in identifying and managing E&S risks, mitigating adverse impacts, and ensuring transparency and accountability. Overall, the ESSA aimed to ensure that the risks and impacts of the RBP were properly identified and mitigated while proposing measures to strengthen system performance and institutional capacity for sustainable Program implementation**.**

3.4. Development of a Program Action Plan (PAP):

Based on the identified gaps, the ESSA proposed corrective actions and system strengthening measures, which were documented in an Environmental and Social Program Action Plan (ES-PAP). Specifically, this included recommendations for capacity building, development of EHS tools, strengthening of institutional coordination mechanisms, and enhancement of monitoring and reporting systems, among others (See Table 3).

3.5. Disclosure and Reporting:

Through a validation workshop, the Consultant presented the ESSA findings to the RBP implementing institutions, government agencies, civil society organizations, private sector actors in the transport sector and development partners for review, and stakeholder feedback was incorporated before finalization.

4. Environmental and Social Policy, Legal and Institutional Framework Relevant to RBP

The implementation of the proposed RISTP–RBP requires appropriate E&S safeguard measures to avoid, minimize, mitigate, or compensate for potential adverse impacts on the environment and communities. These measures are guided by Rwanda's relevant policy, legal, regulatory, and institutional frameworks for E&S management. Implementing institutions will ensure that safeguard requirements are integrated into the planning, implementation, monitoring, and reporting of RISTP activities within the country's existing E&S management systems.

This chapter presents the key environmental and social issues and emerging challenges in Rwanda, including climate change and ongoing environmental and social management initiatives, as well as the environmental and social policy, legal, and institutional framework relevant to the RBP.

4.1. Key Environmental Issues, Emerging Challenges, Climate Change, and Environmental Management Initiatives in Rwanda

The state of Rwanda's environment presents a mixed picture of progress and ongoing challenges. On one hand, the country has made notable achievements in environmental management and policy implementation. On the other hand, significant issues persist, including soil erosion and land degradation, declining water and wetland quality, air and water pollution, and inadequate waste management systems. Climate change impacts such as floods, droughts, and landslides continue to threaten ecosystems, livelihoods, and infrastructure. While some natural resources remain relatively stable, increasing pressure from human activities and economic growth is gradually undermining environmental sustainability.

Underlying Environmental Issues and Emerging Challenges: The Rwanda environmental policy identifies a range of interlinked environmental and climate related challenges that threaten sustainable development in Rwanda. These include climate variability and extreme weather events (such as floods and droughts), high population pressure on natural resources, land degradation, deforestation, pollution (air, water, and soil), and inadequate waste management systems. Additional challenges include limited environmentally friendly transport systems, weak data and information management, insufficient enforcement of environmental regulations (including EIA), and growing volumes of hazardous and electronic waste. Rapid urbanization and reliance on biomass energy further exacerbate environmental stress. The policy highlights that addressing these challenges requires strengthened governance, improved planning and enforcement, increased investment, and enhanced capacity to support a transition towards a resilient and green economy.

Therefore, the policy responds to emerging issues such as climate variability, environmental degradation, pollution, unsustainable resource use, rapid urbanization, and increasing waste streams (including e-waste and hazardous materials). It also aligns with national development frameworks such as Vision 2050, the National Strategy for Transformation (NST1), and global commitments including the Sustainable Development Goals (SDGs) and the Paris Agreement. The

policy emphasizes a transition toward a green, climate resilient economy while ensuring sustainable livelihoods and improved environmental quality for all citizens.

Drivers of Environmental Change: The Rwanda Environmental Policy and the State of Environment Report identifies population growth, economic development, and climate change as the primary drivers of environmental change in Rwanda. Rapid population increase and high population density are placing significant pressure on land, water, forests, and other natural resources. At the same time, economic expansion particularly in sectors such as agriculture, mining, industry, and tourism has intensified resource use and environmental degradation. Urbanization and expanding human settlements further contribute to land conversion and increased waste generation. These drivers are complex and interlinked, with climate change exacerbating their impacts through increased variability, extreme weather events, and natural disasters.

Climate change: The policy underscores Nationally Determined Contributions as a central instrument for aligning Rwanda's development pathway with global climate goals. Rwanda's NDCs prioritize both climate change adaptation and mitigation across key sectors such as agriculture, energy, transport, water, forestry, and urban development. They reflect the country's commitment to contributing to global efforts to limit temperature rise while building a climate resilient, low-carbon economy. The policy emphasizes the need to mainstream NDC targets into national and sectoral planning frameworks, strengthen institutional coordination, mobilize climate finance, and enhance data systems for monitoring and reporting progress. Ultimately, NDC implementation is positioned as a driver for sustainable development, green growth, and long-term resilience.

Initiatives to address Environmental Challenge in Rwanda: Rwanda has adopted a proactive and integrated approach to environmental management through environmental policy, legal, and institutional frameworks. The government has established key institutions and implemented national strategies such as Vision 2050 and the National Strategy for Transformation (NST1), which mainstream environment and climate change across sectors. Specific responses include promoting sustainable agriculture, restoring degraded ecosystems and wetlands, strengthening waste management systems (including bans on plastic bags), improving water resource management, and advancing clean energy and green transport solutions. Rwanda is also investing in environmental governance, public awareness, and international commitments, while promoting green growth and climate resilience as central pillars of development.

Note: To ensure the sustainable implementation of the proposed RBP, all construction activities will be undertaken in an environmentally and socially responsible manner. Implementing institutions will be required to ensure that RBP activities do not exacerbate existing environmental challenges in Rwanda, including land degradation, deforestation, pollution (air, water, and soil), and weaknesses in waste management systems.

4.2. The Constitution of the Republic of Rwanda and the Environmental Policies Framework

a) The Constitution of the Republic of Rwanda

The Constitution of the Republic of Rwanda of 2003, last amended in 2023 (Official Gazette No. Special of 04/08/2023), provides the overarching legal framework guiding all laws and regulations in Rwanda. It establishes key principles for environmental protection under Article 53, which emphasizes the protection, conservation, and promotion of the environment. The Constitution guarantees the right to a clean and healthy environment and places responsibility on both the State and citizens to safeguard and sustainably manage environmental resources. Consequently, environmental laws and regulations have been developed in line with these constitutional provisions, and the program must be implemented in compliance with these requirements.

b) National Environment and Climate Change Policy (2019)

The National Environment and Climate Change Policy (2019) provides a comprehensive strategic framework for integrating environmental protection and climate change considerations into Rwanda's national development agenda. It builds on the 2003 Environment Policy, which led to significant institutional, legal, and regulatory advancements, including the establishment of key institutions such as the Rwanda Environment Management Authority (REMA) and the Rwanda Green Fund (FONERWA). However, evolving environmental challenges, institutional changes, and the increasing urgency of climate change necessitated the revision of the earlier policy.

Policy Objectives: The overarching goal of the policy is to ensure that Rwanda achieves a clean, healthy environment that is resilient to climate variability and change, and which supports a high quality of life for its population. The specific objectives of the National Environment and Climate Change Policy (2019) are:

a) To promote green economic transformation through resource efficient, low-carbon, and climate-resilient development pathways; (**Greening economic transformation);**
b) To enhance the conservation, restoration, and sustainable management of natural ecosystems and biodiversity, while ensuring biosafety;
c) To strengthen meteorological services, climate information systems, and early warning mechanisms for informed decision-making and disaster risk reduction;
d) To promote climate change adaptation, mitigation, and response measures across all sectors of the economy;
e) To improve environmental well-being and quality of life for all Rwandans through effective pollution control and sustainable environmental health practices;
f) To strengthen environmental and climate change governance, including coordination, institutional capacity, and stakeholder participation; and
g) To promote green investments, including foreign and domestic direct investment, and mobilize sustainable financing for environmental and climate actions.

To achieve these objectives, the policy sets out key provisions and directives, including: mainstreaming environment and climate change into national and sectoral planning and budgeting; promoting circular economy principles and green technologies; strengthening enforcement of environmental impact assessments (EIA) and environmental standards; enhancing sustainable land, water, and ecosystem management; improving waste management systems; and fostering public awareness, research, and innovation.

Furthermore, the policy underscores the importance of inclusive governance, multi-stakeholder engagement, and coordination across government, private sector, civil society, and local communities. It also promotes key principles such as the polluter pays principle, precautionary principle, ecosystem-based management, and intergenerational equity to guide sustainable environmental management in Rwanda. This is inline with AIIB Core principle #1 and 2

c) National Policy on EIA (2003)

EIA process operates within and towards the global concept of sustainable development. It is intended to achieve benchmarks and embrace commitment to international environmental conventions agreed upon in Ramsar (1971), Vienna (1985), Montreal (1990), Rio (1992), Kyoto (1998), and Stockholm (2001) to all of which, Rwanda is a party. EIA also provides a framework for promotion of efficient decision-making in project approval. Lastly, EIA enables implementation of environmental safeguards to mitigate significant negative impacts, avoid ecological damage and large-scale irreversible loss of natural resources. The ESSA process is undertaken in the context of ensuring compliance with existing national laws and international legislations and where gaps exist, appropriate national systems strengthening measures shall be recommended to address the possible adverse impacts.

d) Rwanda Biodiversity Policy (2004)

This Policy recognizes that Rwanda's viability is dependent on the conservation of its biological resources as these resources significantly contribute to livelihoods, food sovereignty, health, the environment, cultural diversity and the economy. A system to conserve protected areas is proposed by the study. Degraded ecosystems if any will be restored and recovery of threatened systems will be promoted through the implementation of the program. All potential sources of impacts on biodiversity will be identified through the environmental assessment, and appropriate mitigation measures will be recommended.

Rwanda's **Biodiversity Policy** aims to promote sustainable environmental management practices and conserve its rich biological diversity. Key initiatives include:

The National Biodiversity Strategy and Action Plan (NBSAP), which outlines 22 national tar gets for biodiversity conservation from 2025 to 2030, such as reducing biodiversity loss and rest

oring degraded lands. The policy is aligned with the Convention on Biological Diversity (CBD), focusing on sustainable use and equitable sharing of biodiversity benefits. Rwanda has ratified se veral international treaties promoting biodiversity conservation, including the KunmingMontreal Global Biodiversity Framework. These efforts reflect Rwanda's commitment to environmental m anagement and biodiversity conservation. Potential sources of impacts on biodiversity by the proposed program activities will be identified through the environmental assessment and appropriate mitigation measures will be recommended. Program activities shall additionally be screened and all those posing high E&S risks and impacts on biodiversity shall be excluded in accordance with the Biodiversity Law (Law governing Biological Diversity Law 64 of 2021), the National Parks Law No 001/2023 of 13/01/2023 governing national parks and nature reserves, corresponding ministerial orders to formalize the management of national parks and buffer zones and AIIB Results Based Financing Guidelines. This is inline with AIIB Seven Core Principle Number 1 and 2.

The National Wetlands Policy Management Policy (2015):
Rwanda's **wetlands policy** focuses on the sustainable management and protection of wetlands, w hich are vital for biodiversity and hydrologic processes. Key aspects include:

National Wetlands Management Framework: Rwanda has established a framework for the management and conservation of wetlands. The National Wetlands Management Framework, developed by the Rwanda Environment Management Authority (REMA), provides guidance on wetland inventory, protection, restoration, and sustainable utilization. The framework seeks to ensure that wetland resources are managed in a manner that balances environmental conservation with socioeconomic development.

In line with this objective, Rwanda promotes the sustainable use of water resources within wetlands and related ecosystems to support long term environmental sustainability and economic growth. The government has also undertaken significant wetland restoration initiatives, particularly in urban areas, to reduce flood risks, improve water quality, and address pollution challenges. These efforts have been strengthened through partnerships and investments, including support from the World Bank’s Urban Development Project.

Furthermore, wetlands are recognized as critical ecosystems that sustain biodiversity, provide habitat for wildlife, and support local livelihoods. Despite their ecological and economic importance, many wetlands continue to face degradation from agricultural expansion and other human activities. Through these policies and restoration programs, Rwanda demonstrates a strong commitment to wetland conservation, ecosystem resilience, and the sustainable management of natural resources.

Environmentally sensitive wetlands that might be impacted during implementation of the RBP shall be identified and accordingly subjected to overall national E&S requirements and Good International Industry Practices. This is also consistent with AIIB's Core Principles 1 and 2.

4.3. Legal and Regulatory Framework for Environmental Management in Rwanda

Law No. 48/2018 of 13/08/2018 on Environment (Rwanda). This is the principal Law which governs environmental issues in Rwanda. While this Law provides the overarching legal framework for the protection, conservation, and promotion of the environment, it also establishes guiding principles, regulatory requirements, institutional responsibilities, and enforcement mechanisms necessary for sustainable environmental management. *The Law aims to ensure that environmental protection is integrated into national development processes and that natural resources are used sustainably for present and future generations.*

The Law establishes fundamental principles governing environmental conservation under Chapter II (Articles 3–7). These include the precautionary principle (Article 3), which requires that activities suspected of causing environmental harm should not proceed without scientific assessment; the principle of environmental sustainability (Article 4), which ensures intergenerational equity; and the polluter pays principle (Article 5), which holds polluters accountable for environmental damage. It further provides for the principle of information dissemination and public participation (Article 6) and the principle of cooperation (Article 7), which encourages collaboration among the State, institutions, and stakeholders in environmental protection.

The Law sets out key provisions and regulatory directives relating to environmental protection and management across various sectors. Under Chapter III, it provides for the conservation and sustainable use of natural resources, including soil and subsoil (Articles 8–10), water resources (Articles 11–12), biodiversity (Articles 13–14), and air quality (Article 15). It further mandates that certain projects must undergo Environmental Impact Assessment (EIA) (Article 30) and Strategic Environmental Assessment (Article 31), and be subject to environmental audits (Article 32) and approval of environmental studies (Article 33). In addition, Chapter IV (Articles 17–20) provides directives on the management of liquid, solid, hazardous, and electronic waste, emphasizing proper collection, treatment, and disposal to prevent environmental degradation and protect public health.

The law defines EIA requirements, and it states that: *"Any project, policy, plan, or program likely to have significant impacts on the environment must undergo an EIA before implementation"*. No project can commence without prior environmental authorization from the competent authority. The determination of whether an EIA is required is based on: *The nature, size, and location of the project as well as the magnitude of potential environmental and social impacts*. Therefore, the law establishes a screening approach, rather than a fixed list within the Law.

With respect to obligations of the State, decentralized entities, and local communities, Chapter V outlines shared and specific responsibilities. Article 21 requires the mainstreaming of environmental and climate change considerations into development planning, while Article 22 promotes environmental education and awareness. The State's obligations (Articles 26–38) include protecting soil and biodiversity, regulating energy use, ensuring water and sanitation, and enforcing environmental assessments and audits. Decentralized entities and local communities are also assigned responsibilities under Articles 39–41, including implementing environmental protection measures, participating in conservation efforts, and establishing environmental protection committees to support local-level environmental governance.

Finally, the Law provides for inspection and criminal investigation of powers in environmental matters under Chapter VII (Articles 61–63). These provisions designate authorized personnel with powers to conduct environmental inspections (Article 61), define the scope of their authority (Article 62), and provide for the granting of criminal investigation powers in cases of environmental offences (Article 63). These enforcement mechanisms are complemented by sanctions and penalties outlined earlier in the Law, ensuring compliance and accountability in environmental management.

The Law also establishes a system of administrative fines and sanctions to address noncompliance with environmental requirements. These measures are primarily applied to regulatory breaches and are enforced by competent authorities to ensure adherence to environmental standards without necessarily resorting to criminal prosecution. The approach emphasizes corrective action, deterrence, and restoration of the environment. Overall, Law No. 48/2018 establishes a comprehensive environmental governance framework that integrates legal principles, regulatory controls, institutional responsibilities, and enforcement mechanisms, aligning Rwanda's environmental management system with international best practices and sustainable development objectives.

In relation to the construction and rehabilitation of roads and airports in Rwanda, Law No. 48/2018 provides a critical legal and institutional framework for managing environmental and social risks throughout the project cycle. The Law requires that infrastructure projects likely to generate significant environmental impacts undergo appropriate environmental assessment and obtain environmental authorization prior to implementation, thereby ensuring that potential impacts on land, water resources, biodiversity, air quality, and surrounding communities are identified and mitigated at an early stage. Its provisions on sustainable natural resource management, waste management, public participation, environmental monitoring, and enforcement support the development of transport infrastructure in a manner that minimizes environmental degradation and promotes climate resilience. Consequently, the Law serves as a key regulatory instrument for ensuring that road and airport development projects contribute to Rwanda's economic growth

objectives while remaining consistent with the principles of environmental sustainability, sustainable development, and AIIB Core AIIB Core Principle number 2.

Environmental Impact Assessment Guidelines 2006: *The* Rwanda Environmental Management Authority has developed Environmental Impact Assessment (EIA) regulations that provide detailed guidance and requirements for undertaking EIAs in Rwanda. According to these regulations, Section 2.1.2 (c) (Impact Level 3) identifies projects that require a full EIA. This category includes projects for which significant and adverse environmental impacts are anticipated, and for which mitigation measures cannot be readily defined without a comprehensive assessment. As such, these projects must undergo a complete EIA process.
Consequently, the EIA guidelines serves as a key regulatory instrument for ensuring that road and airport development projects contribute to Rwanda's economic growth objectives while remaining consistent with principles of environmental sustainability and sustainable development.

Ministerial Order No. 001/2019 of 15/04/2019 Establishing the List of Projects that Must Undergo Environmental Impact Assessment (EIA), Instructions, Requirements and Procedures to Conduct Environmental Impact Assessment: This Order provides the legal and procedural framework for identifying projects that require EIA in Rwanda. It classifies projects based on their potential environmental risks and outlines procedures for conducting EIA studies before project approval and implementation. Its main objective is to ensure that environmental, social, and economic impacts of development projects are properly assessed and managed to support sustainable development and informed decision-making (**Article 1**).

Article 3 provides that projects listed under **Annex I** must undergo a **full EIA** before approval. These mainly include large-scale or high-risk projects such as industries, major roads, dams, airports, mining, quarrying, wetlands reclamation, and works in national parks or buffer zones. No such project can be approved without prior EIA.

Article 4 states that projects under **Annex II** require a **partial EIA**, mainly for projects with relatively lower environmental impacts, such as towers, antennas, certain medium-scale buildings, and micro-hydropower plants. These are assessed mainly for environmental compliance and mitigation measures. **Article 5** further provides that projects not listed under Annex I or II are generally exempt from EIA, unless they are likely to cause significant or irreversible environmental impacts, in which case the Authority may require an EIA.

Regarding EIA procedures, **Article 6** requires the developer to appoint a certified environmental expert to prepare and submit the application, project brief, and terms of reference for approval. **Article 7** states that the EIA must be conducted based on approved terms of reference and with

consideration of stakeholder views. **Article 8** requires submission of the EIA report in electronic format to the authorized organ.

Article 9 requires the authorized organ to review the EIA report for compliance with guidelines and approved terms of reference, normally within **20 working days**, with possible extension depending on project complexity. **Article 10** emphasizes public participation by allowing affected communities and stakeholders to provide comments on the proposed project and its likely impacts, ensuring transparency and accountability in environmental decision-making.

Overall, this Order establishes a clear framework for **environmental screening, project approval, stakeholder engagement, and environmental protection**, ensuring that development projects in Rwanda are implemented in a sustainable and environmentally responsible manner.

The law is important for development of transport sector because it requires Environmental Impact Assessments (EIA) for road, airport, and transport projects; and Protection of ecosystems during infrastructure development. Consistent with Article 3, projects listed under Annex I must undergo a full EIA before approval. These mainly include large-scale or high-risk projects and will not be undertaken under the RBP.

Law No. 55/2011 of 14/12/2011 Governing Roads in Rwanda: This is the principal legislation that governs the road network in Rwanda. It provides for regulation of road classification, naming, management, maintenance, financing, development, and use of roads, as well as protection of road reserves and public road infrastructure. The Act establishes a comprehensive framework for road administration, including institutional responsibilities, technical standards, and road safety and traffic control measures. The Act has provisions and directives on: purpose of the law (Article 1), roads naming and classification including national, district, urban and specific roads (Articles 3–4), responsibilities, management, maintenance, financing and road development under national and decentralized institutions such as RTDA, Districts and the City of Kigali (Articles 6–10), and technical standards and road development including opening of new roads and extraction of construction materials (Articles 11–14).

The Law further provides for width of roads and expansion requirements, including minimum widths for different road classes and provision for road widening subject to lawful expropriation (Articles 15–17). It defines road facilities and public domain earmarked for roads, including road components, road reserves, and demarcation requirements (Articles 18–22), and establishes standards for road reserves such as 22 meters for major roads and 12 meters for secondary roads. It also regulates activities within road reserves, including restrictions on construction, encroachment, and installation of utilities without authorization (Articles 25–27), and provides for

removal of unauthorized facilities within road reserves (Article 31) and designation of dumping sites (Article 32).

In addition, the Law provides for routine maintenance and preservation of roads, including continuous maintenance activities such as drainage cleaning, vegetation control, and repair of road damage, as well as periodic and recurrent maintenance measures to ensure road functionality and safety. It establishes provisions for road development, including upgrading, reconstruction, and expansion of roads, and allows concession of road construction and operation to private entities under regulated procedures (Articles 7, 11).

The Law also provides procedures for expropriation for road purposes, requiring lawful acquisition of land for road expansion or development with due process and compensation (Article 33). It establishes offences and penalties related to encroachment, illegal use, or damage to road infrastructure and public road reserves (Article 35), and provides for road traffic regulations governing the use of roads to ensure safety and order (Article 36).

The Law requires the Government to designate quarry sites for sourcing construction materials for roads, ensuring controlled and reliable supply of inputs such as aggregates and gravel. Extraction is strictly regulated and must comply with applicable environmental, mining, and safety laws, meaning it is not open access. Quarry operations require legal authorization and must align with road development plans and standards. This provision supports regulated material sourcing, minimizes environmental and social risks, and ensures compliance with relevant frameworks (Article 12).

This Law is relevant and will guide development and implementation of the proposed infrastructure and transport programs because it establishes clear legal and institutional frameworks for road development and management, defines standards for road reserves and land acquisition, regulates activities within road corridors, and ensures compliance with safety, maintenance, and environmental considerations critical for sustainable road infrastructure development. This is particularly relevant to the proposed road maintenance and upgrading of the national and feeder roads. Core principle 2.

LAW No. 001/2023 of 13/01/2023 Governing National Parks and Nature Reserves: This is the principal legislation governing the establishment, management, protection, conservation, and sustainable use of national parks, nature reserves, and their buffer zones in Rwanda. The law provides a framework for biodiversity conservation, environmental protection, ecosystem integrity, and community participation, while regulating activities that may affect protected and ecologically sensitive areas. Its primary objective is to establish legal and institutional mechanisms for the creation, management, protection, and sustainable utilization of national parks, nature reserves, and buffer zones. It further aims to preserve biodiversity, strengthen environmental

conservation, promote sustainable development, and regulate human activities that may negatively affect sensitive ecosystems (**Article 1**).

The law recognizes **buffer zones** as critical protective areas located between national parks or nature reserves and surrounding land-uses to minimize environmental degradation, human encroachment, and conflicts between conservation and development activities. These zones are intended to enhance ecological sustainability and protect the integrity of protected areas. Their establishment forms part of the broader process of creating national parks and nature reserves. Accordingly, **Article 15** requires that every national park or nature reserve must have a designated buffer zone to reduce adverse impacts from nearby activities and support ecosystem protection. In addition, **Article 16** provides that the size of a buffer zone is determined through an Order of the Minister, based on the ecological characteristics, conservation needs, and management requirements of a specific protected area. This allows flexibility in defining boundaries according to environmental sensitivity.

The law also establishes safeguards for environmental oversight and project management within protected areas. **Article 22** requires any person intending to undertake a project within a national park, nature reserve, or buffer zone to conduct an environmental assessment study in accordance with relevant environmental laws and submit the findings to the responsible Authority. This ensures that potential environmental and social impacts are assessed before project implementation. Further, **Article 23** empowers the Authority to conduct audits, or require audits to be carried out, on activities and operations within national parks, nature reserves, and buffer zones. These audits help ensure compliance with environmental standards, sustainable resource use, and the protection of fragile ecosystems.

The law further provides several safeguards for construction and development activities within or near protected areas, including:

- **Environmental Assessment Requirements:** Any project proposed within a national park, nature reserve, or buffer zone must undergo an environmental assessment before implementation (**Article 22**).
- **Boundary and Land Use Control:** Activities that may alter boundaries, land use, or ecological integrity are subject to ministerial approval and legal procedures (**Articles 18 and 19**).
- **Protection through Buffer Zones:** Buffer zones serve as regulatory spaces that help control development near protected areas and reduce environmental risks (**Articles 15–16**).
- **Scientific and Environmental Oversight:** Research, environmental audits, and coordination with relevant authorities help ensure that infrastructure and development activities align with conservation objectives (**Articles 5, 6, and 23**).

Overall, the law establishes a strong legal and environmental framework to ensure that development, infrastructure, and other human activities near or within national parks and nature reserves are carefully managed in a manner that supports biodiversity conservation and long-term environmental sustainability.

The Kigali – Rusizi road proposed for spot improvements passes through the Nyungwe National Park. Nyungwe National Park, designated a UNESCO World Heritage Site in September 2023, has made significant progress in implementing conservation measures in line with the recommendations of the World Heritage Committee, which include among others: the regulation of buffer zones, the reduction of road traffic, and compliance with the updated General Management Plan (2023–2032). Efforts to reduce traffic through Nyungwe are progressing with the upgrading of an alternative road via Nyamasheke, Karongi, and Muhanga, which is preferred by travelers for its reduced distance and scenic views, and this has already decreased park traffic. Regulatory measures to mitigate wildlife roadkill—spiking from 231 cases in 2023 to 528 cases in 2024—include speed limits (40 km/h), signage, enhanced patrols, and public amenities to address over speeding concerns.The implementation of these regulatory measures is aligned with AIIB Core Principle 3.

Ministerial Order No 003/Moe/25 OF 19/08/2025 Relating to Environmental and Social Impact Assessment. Article 3: specifies the list of works, activities and projects subject to full environmental and social impact assessment before being granted authorization for their implementation under Annex 1, and includes (l) construction and repair of international, national, District roads and bridges; (p) construction of terminal ports, airports and railways; s) works in areas designated as national parks or in their buffer zones. Consequently, spot improvement works along the road section traversing Nyungwe National Park, will require full environmental and social impact assessment before being granted authorization for their implementation, reviewed by RDB in consultation with the Park Authority to ensure that adequate mitigation measures are incorporated to safeguard the park's ecological integrity, biodiversity, and other sensitive environmental resources, in line with the Park's General Management Plan. Despite this level of a full ESIA, the AIIB's Environmental and Social Framework (ESF) [Approved February 2016 (Amended February 2019, May 2021, November 2022, and June 26, 2024], the proposed road works through the Kigali –Rusizi road are categorized as Category B, because: (i) it has a limited number of potentially adverse environmental and social impacts since it is an existing alignment and corridor; (ii) the impacts are not unprecedented; (iii) few if any of them are irreversible or cumulative; (iv) they are limited to the Project area; and (v) they can be successfully managed using good practice in an operational setting. In accordance with the AIIB's approach to RBFs governed by the Operational Policy on Financing (OPF), the Environmental and Social Framework (ESF), Category B projects are considered not to pose significant environmental and social risks and therefore eligible to be implemented by the proposed RBF program.

Law No. 046/2024 of 04/06/2024 Governing Forests and Trees in Rwanda: This is the principal legislation that governs the management, conservation, protection, and utilization of forests, trees, and their products in Rwanda. It establishes a legal framework for sustainable forest management, biodiversity protection, and regulation of forest-related activities. The Act provides for planting, conservation, protection, classification, and management of forests, as well as enforcement mechanisms including administrative sanctions and penalties. The Act has provisions and directives on: purpose of the law (Article 1), planting, conservation and protection of forests and trees (Articles 3–12), categories and management of forests including State and private forests (Articles 13–21), protection and management of protected trees (Articles 27–29), and regulation of forest products and services (Articles 30–36).

The Law further provides for forest planting and tree planting programs aimed at increasing forest cover, including agroforestry and planting along roads, water bodies, and buffer zones (Articles 3–4). It establishes grounds for conservation and protection of forests such as biodiversity protection, climate change mitigation, erosion control, and environmental restoration (Article 5). The Law imposes obligations on the State, private entities, and individuals to conserve, protect, and promote forests, and mandates decentralized entities to implement forest management plans, prevent forest fires, and control pests and diseases (Articles 6–12).

Additionally, the Law classifies forests into State and private forests, with State forests further categorized into protected forests, production forests, protective forests, and research/seed forests, each with specific management regimes and restrictions (Articles 13–18). The Law establishes special protection for certain tree species (protected trees), prohibiting their removal, use, or interference without authorization, and provides for their identification and management through legal instruments (Articles 27–29).

Furthermore, the Law provides for administrative faults, offences, sanctions, and penalties related to illegal harvesting, transportation, or trade of forest products without permits, exceeding authorized limits, and damaging State forests. It sets procedures for seizure of forest products and equipment used in committing offences and establishes deadlines and modalities for payment of administrative fines (Articles 37–46).

This Law is relevant for environmental and infrastructure programs because it ensures sustainable forest resource management, regulates use and protection of forest ecosystems, provides enforcement mechanisms against illegal activities, and supports climate resilience, biodiversity conservation, and compliance with environmental safeguards.

The Law is important for RISTP and for road and airport construction projects in Rwanda, Law No. 046/2024 is important because it ensures that forests, protected trees, and other ecological

resources are properly managed and protected during project planning and implementation. The Law regulates tree clearing, promotes reforestation and restoration of affected areas, and supports biodiversity conservation and climate resilience. It therefore helps ensure that transport infrastructure development is carried out in an environmentally sustainable manner, consistent with AIIB Core Principle 3.

Law Governing Biodiversity in Rwanda (N° 70/2013 of 02/09/2013): This Law determines modalities for management and conservation of biological diversity within Rwanda. Article 9: Biodiversity management plan, states that any person, organization or organ of State which intends to contribute to biodiversity management shall submit to the competent authority a draft biodiversity management plan for approval. The plan shall be related to the management of the following: an ecosystem; indigenous species; alien and migratory species.

Article 11: Monitoring states that the competent authority shall establish monitoring mechanisms and set indicators to determine: the conservation status of various components of Rwanda's biodiversity; any positive or negative trends affecting the conservation status of the various components of biodiversity.

Article 14: Ecosystems in need of protection states that an Order of the Minister shall set out a national list of ecosystems that are threatened and in need of protection and their location. The list referred to under Paragraph One of this Article shall include the following: critically endangered ecosystems; endangered ecosystems; vulnerable ecosystems; other ecosystems with high conservation value or of high national importance. Article 17: states that Activities involving species or specimens included on the list of endangered or protected species are prohibited unless authorized by the Minister.

The proposed Program activities will be designed in accordance with the Law Governing Biodiversity in Rwanda (Law No. 70/2013 of 02/09/2013). This is also consistent with AIIB Core Principle 3.

Law n°49/2018 of 13/08/2018 determining the use and management of Water Resources in Rwanda: This Law regulates the use, conservation, protection, and management of water resources in Rwanda. It defines the rules to the use, conservation, protection and management of water resources. The program will be implemented in the context that avoids contamination of water resources or to overuse it, especially during construction phases of some activities of the program.

This Law is highly relevant to the construction and rehabilitation of roads and airports in Rwanda and specifically for RISTP because such projects may affect natural habitats, ecosystems, and species of conservation importance. The Law requires the protection and sustainable management

of biodiversity, including threatened ecosystems and protected species, and provides a framework for biodiversity monitoring and conservation planning. It therefore helps ensure that transport infrastructure projects avoid or minimize impacts on sensitive ecosystems, protected areas, and biodiversity resources, and that appropriate mitigation measures are incorporated during project design and implementation.

Ministerial Order N°27 of 27/08/2018 Determining Modalities for Concluding a Concession Agreement for Tourism Investment in Protected Areas: This Order establishes the legal and procedural framework for regulating tourism investments in protected areas in Rwanda through concession agreements. It outlines the requirements, principles, and responsibilities for tourism investors to ensure that tourism development is undertaken in a controlled, sustainable, and environmentally responsible manner. The Order further provides guidance on infrastructure development, service delivery, environmental compliance, and the management of tourism-related activities within protected ecosystems. Its primary objective is to define the procedures for granting tourism investment rights in protected areas while balancing economic development, conservation of natural resources, and public interest (**Article 1**).

The Order also establishes key safeguards for tourism and infrastructure development in protected areas, including:

- **Environmental Protection:** Tourism investors are required to comply with applicable environmental and public health laws to safeguard ecosystems and human well-being (**Articles 3 and 17**).
- **Regulated Investment Procedures:** Tourism investments must be undertaken through formal concession agreements with clearly defined procedures, requirements, and responsibilities (**Article 5**).
- **Sustainable Infrastructure Management:** Essential infrastructure, including utilities, waste disposal systems, and communication facilities, must be planned and managed under concession agreements to minimize environmental impacts (**Article 22**).
- **Conservation-Oriented Development:** Tourism activities must prioritize the protection of biodiversity, wildlife, natural resources, and historical assets within protected areas.

Overall, this Order provides a structured framework to ensure that tourism investments in protected areas are carefully managed to promote sustainable tourism, environmental conservation, and responsible economic development.

Although this Law is important for regulating the modalities for concluding concession agreements for tourism investments in protected areas, it is not triggered by the proposed RISTP activities. This is because the Program will not support any tourism-related developments or other business activities within national parks or other protected areas.

Regulation No 002 of 26/04/2018 Governing E-Waste Management in Rwanda: This is the main regulation that guides the management of electronic waste (e-waste) in Rwanda. It provides a legal and institutional framework for the collection, transportation, dismantling, recycling, and disposal of e-waste, with the aim of protecting human health and the environment. The Regulation applies to all actors involved in the lifecycle of electrical and electronic equipment, including producers, importers, distributors, collectors, transporters, recyclers, refurbishers, and consumers (Article 3). This Law defines e-waste as all discarded electrical and electronic equipment and their components that are no longer in use and depend on electricity or electromagnetic fields to function (Article 2).

It establishes a mandatory licensing system for all e-waste management activities. Any person or entity involved in collection, transportation, dismantling, refurbishing, or recycling must obtain a license from the Regulatory Authority, which is valid for five (5) years (Articles 5 and 11). The Rwanda Utilities Regulatory Authority (RURA) is responsible for issuing licenses, monitoring compliance, conducting inspections, and enforcing the Regulation, while the Regulatory Board oversees decision-making.

The Regulation also incorporates Extended Producer Responsibility principles (Article 24), requiring producers, importers, and distributors to take responsibility for the full lifecycle of their products, including take-back, recycling, and safe disposal. In addition, it promotes good practices such as proper handling of hazardous waste, waste reduction, reuse and recycling, use of environmentally friendly technologies, and protection of human health and the environment (Article 4).

This Regulation is relevant to the deployment of Electric Ground Support Equipment (e-GSE) and airport modernization activities, which may involve the procurement and replacement of electrical and electronic equipment such as security screening systems, communication and monitoring systems, CCTV, charging infrastructure, and electric ground support vehicles. These activities may generate e-waste, including obsolete equipment, batteries, and electronic components. The Regulation establishes a framework for the safe collection, transportation, recycling, and disposal of electronic waste (e-waste) through licensed operators, thereby protecting human health and the environment in line with AIIB Core Principle number 4.

4.4. Institutional Responsibility for Environmental Matters in the Republic of Rwanda

The Environmental Law No. 48/2018 establishes a multi-level institutional framework for environmental management in Rwanda, where responsibilities are shared among various actors rather than concentrated in a single institution. This structure promotes coordinated action and accountability across national and local levels.

(i) ***Ministry of Environment (MoE)***

At the national level, the GoR through the Ministry of Environment (MoE) bears the overall responsibility for environmental protection and sustainable natural resource management. It is mandated to formulate policies, enact legislation, and ensure that environmental and climate change considerations are integrated into national development planning. It coordinates all activities related to efficient management of land, water resources, forest, mining activities and environmental management as well as their follow up and evaluation. Therefore, the ministry serves as the lead policy institution, providing guidance and regulatory oversight. It is tasked with developing regulations, standards, and guidelines necessary for implementing the Law, including those related to pollution control, waste management, and ozone layer protection. Through this role, the Ministry ensures coherence in environmental governance and alignment with national priorities. The MoE works closely with Rwanda Environment Management Authority (REMA) to provide the policy oversight during the implementation of various projects to strengthen climate resilience of rural communities in Rwanda. Through REMA it also oversees key environmental management instruments such as Environmental Impact Assessment (EIA), Strategic Environmental Assessment (SEA), and Environmental Audits (EA), thereby providing strategic direction and ensuring compliance across sectors.

The Ministry of Environment (MoE) is organized into two main directorates: the Directorate of Environment and Climate Change, and the Directorate of Land, Water and Forestry. The Directorate General of Land, Water, and Forestry coordinates, with support from stakeholders and development partners, the development and implementation of policies, laws, strategies, and programs for the sustainable management of land, water, and forestry resources. It also provides technical guidance on land use planning, water resource management, and forestry management. In Rwanda, these resources are critical for economic growth, livelihoods, climate change mitigation, tourism development, water catchment protection, and disaster risk reduction.

On the other hand, the Directorate General of Environment and Climate Change is responsible for developing and promoting policies, laws, strategies, and programs related to environmental protection, climate change, pollution control, and meteorological services. It also supports sustainable economic development by promoting green investments and strengthening partnerships with the private sector. Key responsibilities include environmental conservation, biodiversity protection, climate change adaptation and mitigation, institutional capacity building, resource mobilization, and monitoring the implementation of environmental and climate-related policies and programs across institutions and local governments.

The Ministry of Environment is important to road and airport development in Rwanda and specifically for RISTP because it provides policy guidance and oversight on environmental protection, climate resilience, natural resource management, and environmental assessment. Its

role helps ensure that transport infrastructure projects comply with national environmental requirements and are implemented in a sustainable manner.

(ii) *Rwanda Environment Management Authority (REMA)*

The Rwanda Environment Management Authority (REMA) was established in 2002 as the national institution responsible for environmental protection and management. As the principal environmental regulatory and technical authority, REMA oversees environmental monitoring, compliance, and enforcement of environmental laws and standards. It advises the Government on environmental and climate change matters, supports the integration of environmental considerations into national policies and development planning, and promotes environmentally sustainable development. REMA is also responsible for implementing national environmental policies, developing regulatory frameworks, and providing guidance on environmental legislation, including the implementation of relevant international conventions, treaties, and agreements. Its mandate includes pollution control, climate risk management, environmental education and awareness, and oversight of Environmental and Social Impact Assessments (ESIAs), Strategic Environmental Assessments (SEAs), and Environmental and Social Audits (ESAs).

REMA officials indicated that the review and approval of Environmental Impact Assessments (EIAs) and other environmental studies for investment and development projects are the responsibility of the Rwanda Development Board (RDB). REMA's role focuses on environmental oversight, including reviewing project and program briefs to determine the need for Strategic Environmental Assessments (SEAs), approving Terms of Reference, reviewing SEA reports, and monitoring compliance during project implementation. REMA also conducts inspections, environmental audits, and enforcement activities to ensure compliance with environmental and social laws and the effective implementation of Environmental and Social Management Plans (ESMPs). Environmental audits are typically undertaken on a quarterly basis, with a final audit required before project closure.

REMA Administrative Structure: REMA is institutionally structured to coordinate environmental management, regulation, and compliance across the country through both national and decentralized governance arrangements. At the national level, it is governed by a Board of Directors and managed through the Office of the Director General. Its mandate is implemented through specialized directorates and divisions, including the Environmental Compliance and Enforcement Division (DECE), the Environmental Analytics and Lake Kivu Monitoring (EALKM) Division, the Advocacy and Multilateral Environmental Agreement Monitoring (AMEAM) Directorate, and the Single Project Implementation Unit (SPIU), supported by administrative and financial management functions (Figure 5). While REMA operates primarily at the national level and does not maintain district offices, it collaborates closely with decentralized

government structures, particularly the Ministry of Local Government (MINALOC), to ensure effective environmental governance. At the local level, environmental compliance, monitoring, awareness raising, and implementation of environmental policies and regulations are carried out through District Environment Officers and community-level environmental committees.

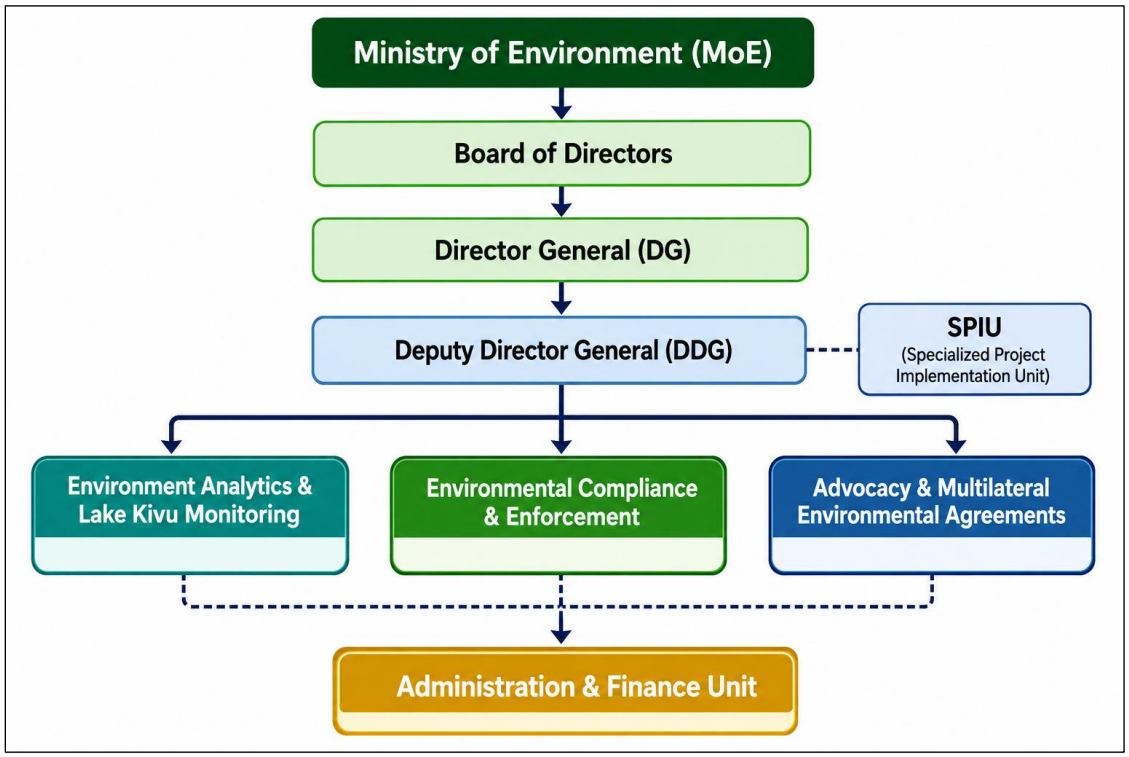


Figure 5: REMA Organisation Structure

REMA's Oversight and Technical Support Functions: ESSA confirmed that REMA provides statutory oversight and technical support to government institutions, including the transport sector, to ensure compliance with environmental and social requirements. This support includes the issuance of sector-specific guidelines, technical advice, capacity building, environmental screening reviews, and compliance monitoring through inspections and audits.

Key policy instruments and laws overseen by REMA include the *National Environment and Climate Change Policy, the National Land Policy, Law No. 48/2018 of 13/08/2018 on Environment, Law No. 27/2021 of 10/06/2021 governing land, and Law No. 49/2018 governing Water Resources*. REMA is also responsible for implementing and enforcing related regulations and ministerial orders, including *Ministerial Order No. 001/2021 of 08/02/2021 on environmental audits and Ministerial Order No. 003/MoE/25 of 19/08/2025 relating to Environmental and Social Impact Assessment (ESIA), which provide the framework for environmental and social risk management in Rwanda.*

Given REMA's key role in environmental monitoring, audits, and enforcement of compliance with environmental laws and standards, the RISTP implementing institutions will need to work closely with REMA to ensure effective supervision of Environmental and Social Management Plans (ESMPs), continuous follow-up, and provision of technical guidance on environmental protection throughout RBP implementation. REMA indicated that it can support RBP implementing institutions in strengthening environmental compliance through the provision of customized compliance checklists tailored to sector agencies such as MININFRA and RTDA, site-specific scoping and advisory sessions, and targeted training for contract managers on the monitoring and implementation of Environmental and Social Management Plans (ESMPs). REMA further emphasized that integrating environmental requirements and clauses into bidding documents at an early stage helps prevent contractor non-compliance, while strengthening environmental oversight at the local level is essential for ensuring timely identification and resolution of environmental issues during project implementation.

REMA Capacity: REMA's institutional capacity to manage environmental and social protection and compliance is generally strong in terms of technical expertise, particularly in environmental management, environmental sciences, and climate-related assessments. However, the institution faces resource constraints that affect the breadth and effectiveness of its oversight functions. Available environmental monitoring equipment is insufficient to meet the growing demand for monitoring activities across the country, while staffing levels and financial resources are increasingly stretched by the rapid expansion of public infrastructure investments and the corresponding need for environmental compliance monitoring.

With respect to social risk management, REMA does not have dedicated Social Development Specialists within its core institutional structure. The agency primarily employs Environmental Management and Compliance Officers, while complex social issues such as land acquisition, resettlement, and land tenure are addressed through collaboration with the National Land Authority (NLA), district authorities, and other relevant institutions. However, for projects implemented directly by REMA through its Single Project Implementation Unit (SPIU), dedicated Social Development Specialists are engaged to support the assessment, monitoring, and implementation of social risk mitigation measures identified through Strategic Environmental Assessments and other safeguards instruments.

REMA further noted that its capacity to oversee compliance across the growing portfolio of government projects remains constrained, particularly at the central level. To address this challenge, the institution relies on a decentralized and multi-tiered oversight system that involves District Environment Officers and certified third-party environmental auditors accredited through RAPEP. While this approach helps extend REMA's monitoring reach, additional staffing,

equipment, and financial resources are needed to ensure timely and comprehensive environmental and social compliance oversight nationwide.

Key Challenges and Areas for Strengthening Environmental and Social Risk Management: REMA noted that, despite progress in environmental and social (E&S) management in Rwanda, several challenges remain. These include limited long-term post-construction monitoring, insufficient attention to social risk management aspects such as localized grievance redress mechanisms and gender-disaggregated monitoring, weak coordination and information sharing among institutions responsible for E&S oversight, and constrained staffing, logistics, and financial resources for effective monitoring of projects across the country. Additional challenges include limited social risk expertise among E&S practitioners, weak contractor self-monitoring and reporting practices, and the tendency for E&S assessment studies to be subcontracted under larger engineering contracts, which can undermine their quality, independence, and effectiveness.

To strengthen E&S risk management, REMA emphasized the need for enhanced institutional coordination through dedicated technical working groups and formal information-sharing mechanisms, increased staffing and resources, including dedicated social risk management specialists, strengthened capacity building for practitioners and contractors, and the adoption of digital compliance monitoring systems. REMA also highlighted the importance of procuring E&S assessments as standalone assignments, strengthening district-level oversight, and integrating clear E&S performance indicators into program implementation and monitoring frameworks.

(iii) ***Districts and Other Local Administrative Units***

The **Ministry of Local Government (MINALOC)** plays a central role in overseeing the decentralization process and implementing community development and social protection programmes. The Ministry of Local Government has six programs and directorates that are mandated to implement the ministry's core mission of ensuring the coordination of good governance and high-quality territorial administration programs to promote economic, social and political development throughout the nation. Within this framework, it is also responsible for environmental governance at the local level, including mobilizing communities to participate in the sustainable management and protection of natural resources.

Decentralized government entities such as districts, cities, municipalities, and other local administrative units are therefore mandated to implement environmental policies and ensure compliance with regulations. Districts oversee implementation of local projects; and prepare and implement consolidated district development Plans. Districts are responsible for the protection and management of natural resources, including water, tourism, and the environment, while urban authorities oversee land use and environmental management, urban planning, road maintenance, management of protected and recreational areas, as well as the provision of water, sanitation, and

waste management services. These institutions also integrate environmental considerations into local development planning, enhancing responsiveness to local challenges and strengthening implementation effectiveness.

MINALOC further coordinates a range of community-based programmes that support environmental management and livelihoods, including Vision 2020 Umurenge Programme (VUP), HIMO (labor intensive public works), *'Ubudehe'*, and the Community Development Fund (CDF). These initiatives actively engage communities, particularly vulnerable groups in income-generating and environmentally sustainable activities.

Overall, Environmental and social (E&S) management related Programs are normally led by specialists within SPIUs, with additional support from district-level staff where required by development partners. District teams commonly include Environmental Officers, Gender Monitoring Officers, Social Development Officers, Land Administration Officers, District Engineers, and Directors of Social Affairs. However, these officers often face competing district-wide responsibilities, which limits their involvement in project-related E&S matters and highlights the need for further training and capacity strengthening.

(iv) ***Local Communities***

The Rwanda Environmental Law recognizes the critical role of local communities in environmental stewardship. Citizens are required to participate actively in environmental protection efforts, adopt sustainable practices, and support conservation initiatives. This participatory approach ensures that environmental management is inclusive and grounded in community engagement.

(v) Environmental protection committees:

To support coordination at the grassroots level, the Law provides for the establishment of environmental protection committees. These committees promote environmental awareness, facilitate community participation, and support monitoring and enforcement activities within their jurisdictions. Prime Minister's Order governing Environmental Protection Committees and their Members Prime Ministers Order 8 of 2021, whose implementation is under the direct responsibility of the Ministry of Environment. The Committees are established at the City, Districts, Sectors, and Cell levels and accordingly report to the respective Councils at City, District and Sectors.

(vi) ***Environmental Inspectors***

The Law designates authorized **Environmental Inspectors** and competent authorities with powers to monitor compliance, conduct inspections, and investigate environmental offences. These enforcement actors are essential for ensuring adherence to environmental standards and for addressing violations through administrative or legal measures.

Overall, Rwanda's institutional arrangement for environmental management is structured across interconnected levels, including the central government, the Ministry in charge of environment (MoE), the Rwanda Environmental Management Authority (REMA), decentralized entities, community structures, and enforcement bodies. This integrated framework ensures coordinated action, effective implementation, and accountability in safeguarding the environment.

(vii) ***Management of Forests***

The Ministry of Lands and Forestry (MINILAF) in Rwanda was established in August 2017from the dismantling of the Ministry of Natural Resources. It is responsible for coordinating the development and dissemination of policies related to land, water, and forestry resources, ensuring their optimal and sustainable use. The ministry plays a vital role in protecting these resources, which are essential for the economy and livelihoods of Rwandans. The Rwanda Forestry Authority (RFA) is the government institution mandated to oversee the management, conservation, protection, and sustainable development of Rwanda's forest resources. Established under Law No. 72/2019 of 29/01/2020, RFA is responsible for promoting sustainable forestry, agroforestry, biodiversity conservation, and climate resilience. The Authority plays a key role in safeguarding forest ecosystems and ensuring the sustainable use of forest resources. Accordingly, the Ministry of Environment and RFA will be consulted and involved in the planning and implementation of subprojects that may affect or are located within or near forested areas and other sensitive natural resources.

(viii) ***Rwanda Development Board (RDB)***

The **Rwanda Development Board (RDB)** is a government institution established in 2008 to coordinate, promote, and accelerate national economic development by integrating agencies responsible for attracting, retaining, and facilitating investments in Rwanda's economy. Formed through the merger of eight government institutions, RDB operates as a One-Stop Centre for both local and international public and private investment. It functions through specialized departments and strategic divisions that oversee investment promotion, tourism development, conservation management, business registration, and innovation support.

Departments under the RDB*:* The RDB operates through key departments including the **Investment Promotion and Facilitation Department**, which attracts and supports both domestic and foreign investments; the **Tourism and Conservation Department**, responsible for promoting tourism as well as managing national parks and wildlife conservation; the **Business Registration and Licensing Department**, which oversees company registration and business licensing services; the **Special Economic Zones and Export Development Department**, which promotes industrialization, export growth, and investment in Special Economic Zones (SEZs); the **ICT and**

Innovation Department, which drives digital transformation, technology advancement, and innovation; and the **Corporate Services and Administration Department**, which provides institutional support through finance, human resource management, legal compliance, and strategic planning. Together, these departments enable RDB to effectively facilitate sustainable economic development and investment in Rwanda.

These departments collectively enable RDB to promote investment, strengthen the private sector, and support Rwanda's sustainable development.

RDB's Role in Environmental and Social Impact Assessment (ESIA) Review: The RDB plays a significant role in ensuring that investment and development projects comply with environmental regulations and sustainability requirements in Rwanda. Through its **One Stop Centre (OSC**), particularly the **Environmental Impact Assessment (EIA) Unit/Environmental Compliance Unit**, RDB oversees the review and coordination of ESIAs for proposed projects. This technical unit is responsible for screening projects to determine environmental assessment requirements, reviewing ESIA reports prepared by registered experts, and coordinating technical evaluations with sector specialists and relevant government agencies. In addition, it facilitates stakeholder and public consultations where necessary, assesses project compliance with environmental and social safeguards, and recommends project approval, revision, or rejection. The unit also supports the issuance of EIA certificates and environmental clearances through RDB's authorization procedures. RDB officials reported that REMA is not responsible for issuing ESIA certificates for existing roads repair/rehabilitation works.

The EIA process begins with the online submission of an application through the Rwanda Development Board (RDB) One Stop Centre (OSC) EIA portal. The project proponent completes the prescribed application form and uploads the required supporting information and documents, including the project brief. The RDB/OSC EIA Unit then reviews the submission and conducts site screening to determine the appropriate level of environmental and social assessment. Authorized professionals certified by the Rwanda Association of Professional Environmental Practitioners (RAPEP) prepare the required environmental and social instruments, which are reviewed by RDB, with technical input from REMA where necessary, particularly for projects affecting protected areas or requiring a detailed ESIA. If the review is satisfactory, an EIA Certificate is issued; otherwise, the application may be rejected, with the proponent retaining the right to appeal (see Figure 6).

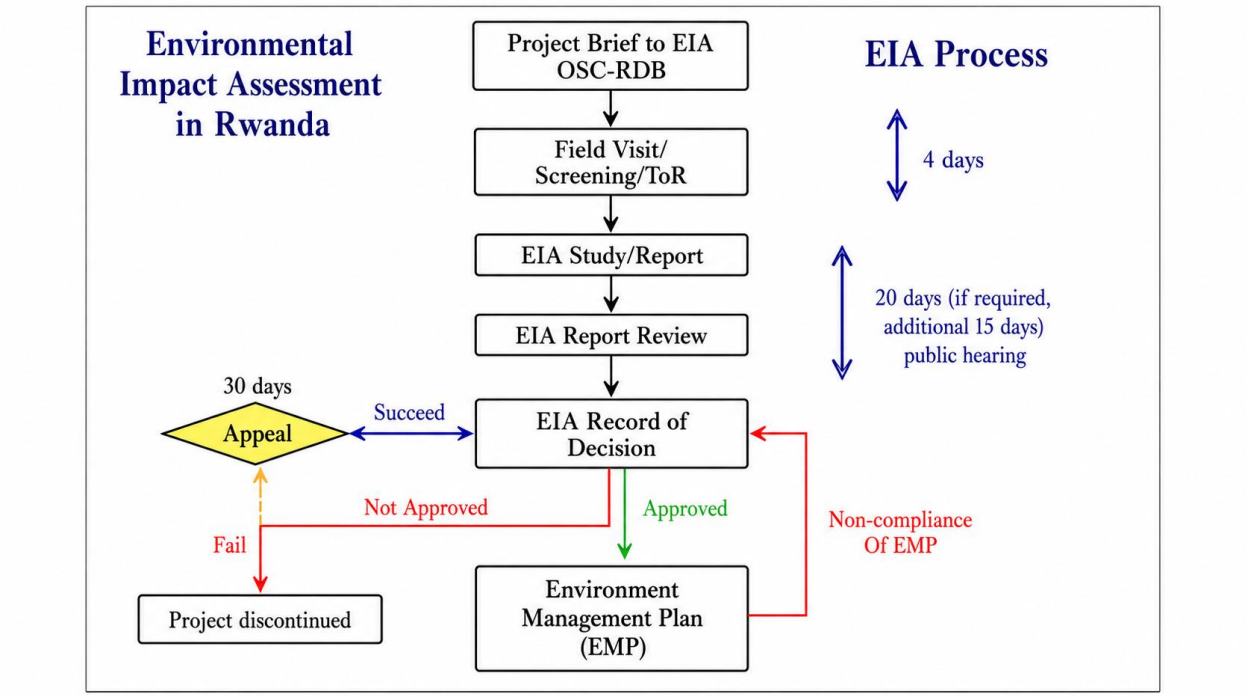


Figure 6: Rwanda EIA Process (Source, WB 2019).

RDB Human Resource Capacity: The ESSA observed that the **ESIA Unit under RDB is significantly overstretched due to the high volume of ESIA reports received compared to the limited staffing capacity available to manage and review them effectively**. At the time of the assessment (April 2026), three staff member were in office and responsible for reviewing ESIA submissions, which significantly constrained the institution's ability to conduct thorough, timely, and comprehensive reviews of ESIA documents. The institutional structure provides five officers and reportedly to be filled soon. This staffing gap poses a challenge to the effective implementation of environmental and social safeguards and may affect the efficiency and quality of the ESIA review process. RDB officials they also requested capacity building on review of ESIA documents and other related impact assessment refresher courses on impact assessment. The ESSA findings are consistent with those by the World Bank which noted that RDB's staffing remains inadequate relative to its increasing workload, affecting the quality of EIA reviews, site verification, and oversight. Capacity gaps also exist in handling complex infrastructure projects. Similarly, REMA and district authorities face staffing, budget, and logistical constraints, limiting effective environmental and social compliance monitoring and enforcement. These findings are consistent with the **World Bank's 2022 Environmental and Social Risk Management Capacity Needs Assessment**, which identified inadequate staffing and technical capacity within RDB, REMA, and district authorities as key constraints affecting the quality of EIA reviews, site verification, and environmental and social compliance monitoring, particularly for complex infrastructure projects.

RBP – Project Screening Categories: RDB confirmed that the proposed activities under Component 1, including the construction and rehabilitation of international, national, and district roads and bridges fall within the categories of projects that require a full Environmental and Social Impact Assessment (ESIA). RDB further noted that the key environmental risks are associated with the design and construction of drainage systems, as well as the establishment and management of borrow pits and construction material extraction sites.

Conservation and Sustainable Management of National Parks: As part of its mandate, RDB oversees the conservation and sustainable management of national parks, including Volcanoes, Akagera, and Nyungwe National Parks. RDB officials noted that any sub-investment affecting national parks requires coordination and approval from RDB. They further highlighted that some protected areas, such as Nyungwe National Park, hold international conservation status as a UNESCO Biosphere Reserve; therefore, investments in such environmentally sensitive areas may require additional review and compliance with international conservation requirements. Nyungwe National Park is managed under a Public-Private Partnership with African Parks Network, guided by an updated General Management Plan (2023–2032).

RDB is also responsible for wildlife management and oversees the conservation and management of the country's national parks, including Volcanoes National Park, Akagera National Park, and Nyungwe National Park. In addition, Accordingly, RDB will be engaged and involved in managing subprojects which pass through or are near Protected/ Wildlife Conservation areas. Accordingly, RDB will be actively engaged in the management and oversight of subprojects that pass through or are located near protected and wildlife conservation areas.

Rwanda Association of Professional Environmental Practitioners (RAPEP). This is the official professional body responsible for coordinating and regulating environmental practitioners in Rwanda. It oversees professional activities, publishes an annual register of certified experts categorized as Lead, Associate, and Junior based on qualifications and experience, and supports training and professional development. RAPEP is supervised by a Regulatory Council comprising representatives from REMA, RDB, RAPEP, PSF, the University of Rwanda, and private higher learning institutions, which monitors EIA practitioners and addresses professional misconduct. The association also collaborates with valuers and engineering professionals. However, RAPEP's membership is largely composed of environmental specialists, creating a skills gap in social impact assessment. As a result, the social components of ESIAs are often weak and repetitive, affecting the overall quality of reports. One of the RAPEP experts participated in the validation workshop and emphasized the importance of integrating biodiversity considerations into the ESIA process in Rwanda. Further details of the experts' inputs to the ESSA are provided in Chapter 7.

4.5. Policy and Legal and Regulatory Framework for Social Management in Rwanda

Below are the relevant policies, legislations and regulations for social matters in Rwanda:

4.5.1. Policies Promoting Social Development and Welfare in Rwanda

a) ***Rwanda Constitution:***

The **Constitution of the Republic of Rwanda** (promulgated in June 2003 and last amended in 2023 and Official Gazette n° Special of 04/08/2023) provides the overarching legal framework for the protection of human rights and fundamental freedoms. Under Chapter IV (Human Rights and Freedoms), it guarantees key rights, including the right to property and protection against unlawful expropriation in the context of development programmes. The Constitution also promotes gender equality, notably by ensuring women's representation in decision-making positions and establishing the Gender Monitoring Office (GMO**)** as an independent public institution mandated to monitor compliance with national, regional, and international commitments on gender equality and gender-based violence (GBV).

Furthermore, the Constitution defines expropriation in the public interest as the legal power of the State, public institutions, and local administrative entities to acquire private property for public purposes, subject to fair compensation. Article 35 provides for compensation, including in-kind compensation where appropriate. These constitutional provisions are critical for any development Programme involving land acquisition, as they require strict adherence to legal safeguards, including fair and adequate compensation for affected persons.

b) ***Vision 2050 (Rwanda's Long Term Development Framework)***

This vision is building on the achievements of Vision 2020. The Vision 2050 sets out a more ambitious pathway to transform Rwanda into a high-income country with a high standard of living. It establishes two key milestones: attaining upper middle-income status by 2035 and achieving high-income status by 2050.

The Vision prioritizes several strategic areas, including improving livelihoods and human capital, developing modern infrastructure and sustainable urban systems, promoting innovation and a knowledge-based economy, strengthening environmental sustainability and climate resilience, and reinforcing good governance and strong institutions.

Implementation of Vision 2050 is carried out through medium term frameworks such as the National Strategy for Transformation (NST1) and sector specific strategies, which translate long-term goals into concrete programmes and investments.

Overall, Vision 2050 provides a structured and phased roadmap for Rwanda's transformation, guiding the country toward inclusive growth, environmental sustainability, and improved social wellbeing.

c) *National Gender Policy*

Rwanda demonstrates a strong commitment to promoting gender equality and upholding human rights as both a national priority and a foundation for sustainable development and inclusive economic growth. The country is widely recognized as a global leader in gender equality, having closed approximately 80% of its gender gaps. It ranks among the top performers worldwide and is the only country where women constitute a majority in elected positions, reflecting sustained efforts to advance women's representation and empowerment. This commitment is further reinforced through the integration of gender considerations into national laws and development frameworks, as highlighted in the UNDAP Gender Mainstreaming Strategy (2018–2023).

To operationalize this commitment, the National Gender Policy was developed to ensure that gender equality is systematically integrated across all sectors of development, in line with national strategies such as Vision 2020 and the Economic Development and Poverty Reduction Strategy (EDPRS). The policy emphasizes key pillars including gender mainstreaming, capacity building, and women's empowerment as essential drivers of equity and inclusive growth. Addressing gender-based violence (GBV) remains a central priority within this framework.

In this context, the National Policy against GBV (2011) provides a comprehensive approach focused on prevention, awareness-raising, protection, and support for survivors. Its implementation strategy recognizes the complex and interrelated drivers of GBV, including entrenched social norms, cultural beliefs, gender power imbalances, economic dependency, limited awareness of rights, and substance abuse. The policy also strengthens institutional coordination by assigning clear roles and responsibilities to line ministries and implementing agencies, thereby enhancing accountability and effectiveness in addressing GBV nationwide.

4.5.2. Current Status and Key Challenges in Addressing Gender-Based Violence (GBV) at Central and Local Government Levels in Rwanda

GBV remains a significant challenge across Africa, disproportionately affecting women (Ologede et al., 2020). In Rwanda, evidence indicates that 56% of women have experienced some form of violence in their lifetime (UN Women, 2023). Similarly, data from the National Institute of Statistics of Rwanda (NISR, 2021) shows that 37% of women and girls aged 15–49 have experienced physical, sexual, or psychological violence. The same report further highlights that 46% of ever-married women and 18% of ever-married men have experienced spousal violence, including physical, sexual, or emotional abuse.

Despite these challenges, Rwanda is widely recognized as a global leader in advancing gender equality. The government has implemented comprehensive policies, legal frameworks, and innovative community-based approaches aimed at closing gender gaps and strengthening the prevention and response to GBV.

Key Challenges in Addressing GBV at Central and Local Government Level: According to Roberte et al. (2018), policy and legal analysis in Rwanda highlights several challenges affecting the implementation of GBV interventions at both central and local government levels.

First, despite available institutional framework for addressing gender and GBV, important gaps remain. For example, there is a need for a dedicated Adolescents' Unit within the Ministry of Gender and Family Promotion. While Rwanda provides psychosocial, medical, and legal support to teenage mothers, challenges persist in their social reintegration, as many receive limited support from families and communities. Efforts to facilitate their return to school are also constrained by the absence of childcare services such as crèches.

Second, although coordination mechanisms exist, their effectiveness is limited. Coordination among actors working on GBV is often weak, as illustrated by the irregular functioning of the National GBV Technical Working Group, partly due to reliance on external funding.

Third, while all government institutions are required to prepare Gender Budget Statements (GBS) to guide and monitor gender-responsive planning and budgeting, GBV issues are not consistently reflected in performance contracts, plans, and budgets. This limited integration, as noted by stakeholders and reflected in the GMO 2015/16 annual report, weakens the effective implementation of GBV-related policies.

Fourth, resource constraints continue to undermine service delivery. Although national policy stipulates that GBV survivors should access free legal and medical services, funding remains inadequate. In addition, the legal framework does not provide for compensation to victims, which often leads survivors to pursue informal or amicable settlements rather than formal justice processes, partly due to concerns about stigma and potential backlash.

Finally, while many gender and GBV interventions primarily target women and girls, insufficient engagement of men and boys contributes to the persistence of negative attitudes and behaviors, limiting the overall effectiveness of prevention efforts.

4.5.3. Legal Framework for Social Risks Management in Rwanda

This section outlines the legal and institutional frameworks in Rwanda that are designed to safeguard social issues:

Labour Law No 66/2018 of 30/08/2018 (Rwanda): This Law establishes a comprehensive framework governing employment relationships in Rwanda, with the aim of protecting workers' rights and ensuring fair, safe, and lawful working conditions across both public and private sectors. At its core, **Articles 4–10** set out fundamental labour rights. These include the right to a conducive working environment, a minimum working age of 16 (with regulated light work for younger children), and the prohibition of hazardous child labour, forced labour, sexual harassment, and workplace discrimination. The Law also guarantees freedom of opinion and association, thereby strengthening basic worker protections.

In addition, the Law addresses worker welfare and compensation. **Article 19** defines occupational accidents and diseases and obligates employers to prevent risks, report incidents, and provide compensation. Meanwhile, **Article 68** establishes a statutory minimum wage framework to ensure fair pay and protect workers, especially those in vulnerable employment. With regard to occupational health and safety, **Article 77** requires employers to maintain safe workplaces through risk identification, preventive measures, and proper workplace design, while employees must comply with safety rules. This is reinforced by provisions requiring employers to provide appropriate **personal protective equipment (PPE)** at no cost and ensure its proper use through training, particularly in high-risk sectors.

Furthermore, **Article 80** emphasizes emergency preparedness by requiring first aid facilities, fire safety systems, and trained personnel, while also granting workers the right to withdraw from imminent danger without penalty. On dispute resolution, **Articles 102–104** promote amicable settlement through dialogue and mediation, supported by collective bargaining mechanisms and clear time limits for claims, thereby ensuring efficient and cooperative resolution of labour disputes.

Overall, the Law integrates labour rights, workplace safety, fair wages, and dispute resolution into a coherent system that promotes decent work, protects vulnerable workers, and supports sustainable labour practices in Rwanda.

Law No 71 of 2018: Protection of the Child in Rwanda: This is the main law that governs the protection and rights of children in Rwanda. It provides a clear legal framework for safeguarding children's welfare, defining their rights, and addressing offences against them.

The Law sets out the special rights of the child, establishes measures for child protection, and defines offences and penalties for violations of children's rights (Article 1). It applies to all children in Rwanda, including both Rwandan and foreign children (Article 2). A child is defined as any person below eighteen (18) years of age (Article 3).

According to this Law key rights of the child (Articles 4–10), include: the right to proper development and parental care, equality and non-discrimination, access to healthcare and medical

insurance, access to information, rest and leisure, and freedom of thought, expression, religion, and association. These rights support the overall growth and well-being of the child.

Although detailed provisions on child labour are covered in other laws, this Law aligns with international standards by protecting children from harmful and exploitative work. It also criminalizes various acts against children, such as harassment and severe punishment (Article 28), and involving children in harmful activities (Article 29), among others. Overall, this Law is very important for social protection and development programs because it clearly defines children's rights, provides mechanisms for their protection, and sets strong penalties against abuse, exploitation, and neglect. It ensures that all activities involving children are carried out in a safe, lawful, and child-friendly manner in Rwanda.

Law No. 59 of 2008 on Prevention and Punishment of Gender-Based Violence (Rwanda). This Law provides legal framework for preventing and punishing gender-based violence (GBV), it also establishes protective measures, defines offences, and prescribes penalties aimed at safeguarding individuals from all forms of violence rooted in gender inequality. The Law aimed to prevent and suppress gender-based violence in Rwanda. **Article 2** defines GBV as any act causing physical, psychological, sexual, or economic harm based on one's sex, whether occurring in public or private settings.

The Law establishes **measures for prevention and protection against GBV** under **Chapter II (Articles 3–11)**. The Law also emphasizes the protection of vulnerable groups, including children (**Article 7**) and pregnant women, guaranteeing rights such as maternity leave and protection from dismissal due to pregnancy (**Articles 8–9**). Furthermore, **Article 10** obliges individuals and institutions to prevent GBV and assist victims, while **Article 11** prohibits indecent acts, reinforcing moral and social safeguards.

The Law further outlines **acts that are criminalized and related procedures** under **Chapter III, Section One (Articles 12–13)**. It provides for victim-sensitive judicial processes, including conducting hearings at the scene of the crime where appropriate (**Article 12**) and allowing broad admissibility of evidence and testimonies, including those from children and community members (**Article 13**). These provisions aim to facilitate access to justice and strengthen prosecution of GBV cases.

In addition, the Law prescribes **GBV offences** under **Chapter III, Section Two (Articles 14–37)**. It criminalizes a wide range of offences, including rape (**Article 16**), abduction (**Article 17**), sexual harassment (**Article 24**), sexual slavery (**Article 23**), and human trafficking (**Article 28**). Severe penalties are imposed depending on the gravity of the offence. For example, rape attracts imprisonment ranging from 10 to 15 years, increasing to life imprisonment where it results in terminal illness or death (**Article 16**). Similarly, offences such as sexual torture (**Article 27**) and

intentional transmission of a terminal disease (**Article 29**) are punishable by life imprisonment. The Law also penalizes related acts such as defamation on gender grounds (**Article 34**), failure to assist victims (**Article 36**), and false accusations of GBV (**Article 37**).

Overall, Law No. 59 of 2008 establishes a robust legal regime that combines prevention, protection, accountability, and victim support mechanisms. By clearly defining offences and prescribing stringent penalties, it strengthens Rwanda's commitment to eliminating gender-based violence and promoting human dignity, equality, and justice. This Law is relevant to the Program as construction activities may give rise to risks of GBV and sexual exploitation and abuse (SEA). Accordingly, implementing institutions will be required to comply with its provisions throughout the execution of the Program to ensure adequate prevention, protection, and response measures are in place.

Law No. 27/2021 of 10/06/2021 Governing Land in Rwanda: This is the principal legislation that governs land administration, tenure, and management in Rwanda. It establishes a comprehensive legal framework for land acquisition, registration, allocation, possession, transfer, management, and use, while promoting equitable access to land, security of tenure, sustainable land use, and effective institutional arrangements for land governance. The Act has provisions and directives on: classification of land into rural and urban categories (Article 4), prohibition of discrimination and guarantee of equal rights to land ownership including gender equality (Article 5), and provision for freehold ownership granting full and indefinite rights to Rwandan citizens with limited exceptions for foreigners under Presidential Order.

The Law further provides for land tenure rights and use, including absolute enjoyment of land rights subject to compliance with applicable laws (Article 41), and presumption that developments or property on land belong to the landowner unless proven otherwise (Article 42). It outlines lawful modes of land acquisition such as inheritance, purchase, donation, allocation, and prescription, while prohibiting fraudulent acquisition of land. The Act also establishes obligations of landholders, including protection and conservation of land, productive use, respect for servitudes, non-interference with underground and airspace activities, and payment of land taxes and fees (Articles 44–48).

Additionally, the Law provides for institutional arrangements for land management and administration, including the mandate of the Ministry in charge of land and its affiliated agencies such as the Rwanda Land Management and Use Authority at the national level (Article 66), and the role of decentralized entities (Districts, Sectors, and Cells) in implementation, monitoring, and land use management at local levels (Article 67). It also establishes Land Committees to support land administration and dispute resolution at community level (Article 68), and provides for land valuation mechanisms to ensure fair compensation, taxation, and land transactions (Article 84).

This Law is relevant for infrastructure and development programs because it establishes secure land tenure and transfer systems, ensures nondiscrimination and gender equality in land access, provides clear obligations for sustainable land use, defines institutional responsibilities for land governance, and supports land acquisition and valuation processes critical for compensation and resettlement (RAPs). This is in line with the AIIB Core Principle number 5.

Rwanda National Land Use Planning Guidelines: Land is a critical factor of production in Rwanda, making its effective management essential for achieving sustainable development. In this context, the Government of Rwanda approved the National Land Use Development Master Plan (NLUDMP) in 2010, alongside other urban and human settlement planning instruments. These standards and guidelines serve as key tools for land use management, spatial planning, and permitting processes. They were subsequently revised in 2020 to strengthen their effectiveness and remain highly relevant to the implementation of the Program (GoR, 2020).

Rwanda Traffic Law (Presidential Order No 25/01 of 25/02/2015 Modifying the General Traffic and Road Traffic Regulations): This is the principal legal instrument governing road traffic management and safety in Rwanda. It provides for regulation of road use, vehicle standards, driver requirements, traffic control measures, and institutional responsibilities for road safety. The Order establishes provisions and directives on: driver licensing (Article 1), speed limits for public and goods vehicles (Article 2), vehicle safety requirements and equipment (Article 3), institutional coordination through the National Road Safety Committee (Article 4), and enforcement responsibilities (Article 5).

The **purpose of this Order** is to regulate road traffic and ensure safety for all road users by setting standards for driving, vehicles, and traffic operations. It aims to reduce road accidents and promote orderly use of public roads. Regarding the **scope of application**, the Order applies to all road users, including drivers, vehicle owners, and transport operators using public roads in Rwanda, as well as vehicles in transit within the country. It governs both private and commercial transport activities. **Article 5** designates the **authorities responsible for implementation**, including the Prime Minister, and key ministries such as Infrastructure, Defense, Foreign Affairs, Local Government, Internal Security, and Finance and Economic Planning. These institutions are collectively responsible for enforcing compliance and ensuring road safety governance.

With respect to **construction activities**, the Order provides important safety and operational requirements relevant to road works and infrastructure projects. It requires that:

- Vehicles used in construction comply with safety standards, including proper steering systems, reversing mechanisms, speed control devices, and safety accessories (Article 3).
- All vehicles must carry essential safety equipment such as warning triangles, first aid kits, and protective systems to prevent accidents.

- Speed limits and control measures (Article 2) must be respected, particularly for heavy vehicles commonly used in construction works.
- Any specialized or modified vehicles (e.g., those used for road construction or equipped with special features) may require authorization before operating on public roads.

These provisions are particularly relevant for infrastructure projects, as they ensure safe movement of construction vehicles, protection of workers and the public, and compliance with national road safety standards.

Law No 20/2018 of 29/04/2018 Establishing Regulations Governing Civil Aviation (Rwanda): This Law provides the main legal framework for civil aviation in Rwanda. It regulates air transport, aviation safety, air navigation services, aircraft operations, and aerodrome management. It also covers licensing, certification, safety oversight, accident investigation, and compliance with international standards, particularly the Chicago Convention. The purpose of the Law (Article 1) is to ensure safe and well-regulated aviation activities in line with international requirements.

The Law applies broadly to all civil aviation activities (Article 3), including aircraft personnel, Rwandan and foreign aircraft, national airspace, aerodromes, air navigation services, and air transport operations. It also covers aircraft accidents linked to Rwanda, while excluding State aircraft unless otherwise specified.

In terms of safety, the Law establishes a comprehensive framework under Chapter V. It introduces the National Aviation Safety Programme (Article 37), outlines its components (Article 38), and assigns oversight powers to ensure compliance (Article 39). It also requires aviation actors to implement Safety Management Systems (Article 40) and follow operational and technical safety standards. Additional provisions regulate aircraft operations, maintenance, and transport of dangerous goods, while clearly defining responsibilities of operators, owners, and personnel (Articles 41–52).

Regarding construction and infrastructure, Article 9 provides for the establishment of airports and air navigation facilities in line with international standards, guiding the planning and development of aerodromes. Article 10 further empowers the Minister to issue detailed regulations, including technical requirements for construction and operation. Together, these provisions ensure that aerodrome construction follows approved standards and is properly regulated before use.

***Law No 10/2012 of 02/05/2012 Governing Urban Planning and Building in Rwanda*:** This is the main law that regulates urban planning and building in Rwanda. It sets out a clear framework for land use planning, control of urban development, construction standards, and institutional responsibilities. The Law aims to guide proper planning and development of urban areas (Article 1). It applies to all categories of urban areas, including large cities, municipalities, and agglomerations (Article 4). It requires that all development be based on approved planning

documents to ensure orderly land use, prevent informal settlements, and support proper infrastructure development (Articles 12–20).

The Law also provides mechanisms for land acquisition for urban development by the State, the City of Kigali, and Districts (Article 55). It requires that such land be used for public interest or development purposes (Article 62). In addition, it allows for expropriation of land for public purposes, which must be carried out by competent authorities, follow legal procedures, and ensure fair compensation. Expropriated land must be used for public interest projects (Article 58). Furthermore, the Law includes provisions on urban renewal and building refurbishment. It requires prior authorization for works on historical and protected buildings and provides for supervision of such activities to protect heritage and maintain urban standards (Articles 78–79).

Overall, this Law is very important for infrastructure and urban development programs because it regulates land use and zoning, provides legal procedures for land acquisition and expropriation, sets building standards and permit requirements, guides urban renewal, and ensures proper coordination among institutions. It therefore helps ensure that urban development is planned, lawful, and sustainable in Rwanda.

4.5.4. Ministries and Institutions Responsible for Promoting Social Development and Welfare in Rwanda

The social sector in Rwanda is governed by several key ministries responsible for promoting social welfare, inclusion, and human development as detailed below:

4.5.4.1. Core Social Ministries and Institutions

a) **MIFOTRA:** Established under **Prime Minister's Order No. 087/03 of 14/08/2020**, the Ministry of Public Service and Labour (MIFOTRA) is responsible for developing and monitoring national labor and employment policies, including Occupational Health and Safety (OHS). It implements its mandate through key departments and manages systems such as the **Integrated Payroll and Personnel Information System (IPPIS)** for human resource management and the **Integrated Labor Administration System (ILAS)**, which covers OHS, labor inspections, disputes, child labor, and incident reporting. Through its SPIU, MIFOTRA also oversees project implementation and monitoring. However, the public interface of ILAS is not yet operational, likely due to capacity constraints.

b) ***Ministry of Gender and Family Promotion (MIGEPROF).*** The Ministry plays a central role in promoting gender equality, preventing gender-based violence (GBV), and strengthening child protection and family welfare systems. It develops policies and guidelines to ensure that gender considerations are effectively integrated into the planning and implementation of programmes at both central and local government levels. In this regard, it provides guidance

to sector ministries, including those responsible for natural resources and the environment, as well as local governments, to mainstream gender issues and mobilize communities' women, men, and youth in environmental protection and sustainable resource management.

c) **Gender Monitoring Office:** To effectively deliver on its mandate, the Ministry collaborates with the **Gender Monitoring Office (GMO)** and other key institutions, including the National Women's Council, the National Commission for Children, and gender desks within the Rwanda National Police and the Rwanda Defense Force. Through this coordinated approach, it advances gender equality, empowers women, and strengthens efforts to prevent and respond to GBV.

d) ***Ministry of Local Government (MINALOC)***. It oversees decentralization and the implementation of social protection programs, including initiatives such as *'Ubudehe*[4]*'* while also supporting vulnerable populations and community development.

e) *The* ***Ministry of Public Service and Labour (MIFOTRA)***. It is responsible for regulating labour matters, including employment policies, occupational health and safety, and the protection of workers' rights.

f) ***Ministry of Health (MoH)***. It provides leadership on public health issues, addressing areas such as mental health, reproductive health, and healthcare services for vulnerable groups. The Ministry is also responsible for occupational health services, surveillance of occupational diseases and workplace health promotion.

g) ***Ministry of Local Government (MINALOC)***. At the decentralized level, social protection and community welfare are implemented through local government structures under the **MINALOC**, including districts, sectors, and cells. These are complemented by community-based mechanisms such as Social Affairs Committees, community mediators, and GBV committees, which play a vital role in conflict resolution, community engagement, and the identification and support of vulnerable individuals.

Together, these ministries form a coordinated institutional framework that supports social protection, human capital development, and inclusive growth in Rwanda.

[4] *Ubudehe a cultural practice where community members worked together to support vulnerable households, especially in farming and building homes. Today, it has evolved into a formal system used by the government. Ubudehe is now a household classification system used by the Government of Rwanda to: identify levels of poverty and vulnerability, target social protection programs and allocate public support fairly.*

4.5.4.2. Specialized Agencies Promoting Social Issues

The institutional framework for social protection and justice in Rwanda is supported by a range of specialized government agencies, justice institutions, and decentralized community structures. Among the key government agencies are:

a) *Rwanda Labour Inspectorate (RLI)*

The Labour Inspectorate, operating under the Ministry of Public Service and Labour (MIFOTRA), is mandated to enforce occupational health and safety (OHS) standards and ensure compliance with labour regulations. Its key responsibilities include monitoring workplace conditions, enforcing labour standards, promoting occupational safety and health, investigating workplace accidents and occupational illnesses, resolving labour disputes, and providing guidance to employers and employees on compliance with labour laws. This mandate is primarily derived from the Rwanda Labour Law, Ministerial Order Nº 001/19.20 of 17/03/2020 relating to labour inspection, and Ministerial Order No. 02/MIFOTRA/2023 on Occupational Safety and Health.

The Labour Inspectorate has supported the implementation of MININFRA projects by promoting compliance with OSH requirements across infrastructure activities. This support has included conducting labour inspections, providing technical guidance on workplace safety and labour compliance, participating in awareness creation and training activities, and investigating occupational accidents where necessary. The Inspectorate has also advised contractors and project managers on corrective actions to address identified risks and non-compliance issues, while collaborating with infrastructure stakeholders during project implementation to strengthen workplace safety and health standards.

Major OSH Issues in Rwanda's Construction Industry. The Labour Inspectorate pointed out that major OSH issues in Rwanda's construction industry largely relate to unsafe working conditions and inadequate safety management practices. Key concerns include falls from heights, improper or inadequate use of personal protective equipment (PPE), unsafe scaffolding and excavation practices, and exposure to dust, noise, and hazardous substances affecting both workers and nearby communities. Other common risks include electrical hazards, poor machinery operation and maintenance, inadequate safety signage, long working hours leading to worker fatigue, limited training on safety procedures, and insufficient emergency preparedness and first aid arrangements. These issues contribute to workplace accidents, injuries, and health risks if not effectively managed and monitored.

The Labour Inspectorate Capacity to Manage OHS: The Labour Inspectorate is ***Moderately Equipped*** to manage labour related legal procedures and support OSH matters through coordination with other competent institutions. It has strong authority to enforce labour laws and OSH compliance, conduct inspections, investigate workplace incidents, and oversee corrective actions. In terms of **organizational structure**, it operates through a coordinated system that

combines central oversight with decentralized implementation. At the central level, the Ministry provides policy direction and overall supervision of labour inspection functions. ***Labour inspectors are deployed at both national and district levels to monitor workplace compliance, conduct inspections, investigate accidents, and enforce labour and OSH requirements through administrative measures***. The Inspectorate also collaborates closely with district authorities and other public institutions, while coordinating with agencies responsible for social security, occupational health, environmental management, and standards enforcement to ensure effective implementation of its mandate. AIIB Core Principle number 4 or number 5? OHS

Pressing OHS Challenges in Rwanda: ESSA has found that several critical issues still require attention to strengthen OSH implementation and enforcement in Rwanda. A key challenge is the need to **enhance enforcement capacity and expand inspection coverage to improve compliance monitoring across the growing number of workplaces and project sites**. This is constrained by limited human and financial resources, an insufficient number of labour inspectors relative to workload, and difficulties in monitoring remote or geographically dispersed project sites. Limited specialization in OSH and inadequate access to specialized monitoring equipment further reduce institutional effectiveness.

Capacity and awareness gaps also remain significant. There is a continued need for regular OSH awareness and training for both employers and workers, increased availability of specialized OSH professionals and private service providers, and stronger occupational health surveillance systems. Compliance remains particularly challenging among small and informal enterprises, where OSH awareness and enforcement are often weaker. In addition, improved reporting systems for occupational accidents and occupational diseases are needed to strengthen monitoring, response, and preventive actions. Greater employer investment in preventive OSH measures is also necessary to reduce workplace risks and improve overall safety performance.

From a legal and regulatory perspective: From a legal and regulatory perspective, the Labour Inspectorate noted several areas that require improvement. These include limited detailed standards for managing emerging occupational risks, weak occupational disease monitoring and surveillance systems, inadequate resources to ensure effective nationwide inspection coverage, and the need for enhanced specialized training and capacity building for OSH professionals, including labour inspectors.

Regarding support to RBP in ensuring compliance with national OSH laws and regulations, the agency highlighted practical implementation challenges. These include the limited number of labour inspectors compared to the increasing number of workplaces and project sites requiring inspection, particularly with the rapid expansion of infrastructure and other business activities. Additional concerns include non-compliance by some contractors and subcontractors, limited OSH awareness among workers, delays in reporting occupational accidents and incidents, and

inconsistent application of safety standards across project sites. Addressing these challenges will require strengthened supervision, continuous awareness raising, improved reporting mechanisms, stronger contractor accountability, and enhanced coordination among implementing institutions and relevant stakeholders.

These findings are consistent with **The World Bank's June 2022 Rwanda Country Portfolio Performance Review (CPPR)**, which highlighted broader weaknesses in managing Environmental and Social (E&S) risks in development projects, particularly limited institutional and technical capacity in areas such as OHS, labor, resettlement, gender, disability, social inclusion, and Environmental and Social Impact Assessment (ESIA). The review emphasized the need for targeted capacity building to strengthen E&S systems, improve alignment with international standards, and support sustainable development and investment.

Initiatives to improve OSH in Rwanda: The Labour Inspectorate reported that several positive developments have strengthened OSH enforcement in Rwanda. These include strong government commitment to improving workplace safety, supported by the adoption of Ministerial Order No. 02/MIFOTRA/2023 on Occupational Safety and Health. There has also been improved awareness among employers regarding their OSH responsibilities, increased use of PPE in high-risk sectors such as construction, and better coordination between labour inspectors and other regulatory institutions. Additionally, OSH considerations are increasingly being integrated into major infrastructure and development projects, contributing to improved safety management practices. This is reflected in the growing inspection efforts within the construction sector, where the agency conducted 68 inspections in 2024–2025 and 74 inspections in 2025–2026, demonstrating strengthened oversight and enforcement of occupational safety and health requirements.

b) ***National Child Development Agency (NCDA).***
NCDA is responsible for coordinating child protection systems, early childhood development, and overall child welfare programs.

c) *The* ***Rwanda Social Security Board (RSSB).***
RSSB provides social security services, including pensions, occupational injury insurance, and health insurance schemes, thereby contributing to social protection and economic security.

d) *The* ***Rwanda Biomedical Centre (RBC)***
RBC implements national health programs, including those related to HIV/AIDS, GBV response, and community health services.

e) ***Gender Monitoring Office (GMO)****:*

This institution plays a central oversight role in Rwanda's gender governance framework by ensuring compliance with gender equality policies and monitoring progress in the prevention of GBV. It is a strategic institution mandated to drive gender inclusive transformation across all sectors through coordinated interventions that are tailored to Rwanda's social, economic, and institutional context.

Over the past two decades, the Government of Rwanda has made significant progress in advancing gender equality through the implementation of various policies and programmes aimed at ensuring equal enjoyment of human rights and fundamental freedoms by both women and men. This commitment is aligned with global and regional development frameworks, including the Sustainable Development Goals (particularly SDG 5 on gender equality), the African Union Agenda 2063, the East African Community Vision 2050, and the African Union Strategy for Gender Equality and Women's Empowerment (2018–2028). Rwanda's efforts therefore contribute both to national development priorities and to fulfilling international and regional obligations.
At the national level, gender equality and women's empowerment are guided by key policy frameworks such as Vision 2050, the National Strategy for Transformation (NST1), the National Gender Policy (2021), and sector specific strategic plans. Vision 2050 provides a long-term pathway that emphasizes the role of women and youth in economic transformation and improved livelihoods, while NST1 operationalizes this vision by promoting gender mainstreaming across sectors, districts, and national investment planning.

Together, these frameworks and institutional mechanisms position the GMO as a key driver of accountability and progress in achieving gender equality and inclusive development in Rwanda.

a) The National Council of Persons with Disabilities (NCPD)

The NCPD is a key public institution in Rwanda mandated to promote the rights, inclusion, and welfare of persons with disabilities. It was established to ensure that disability issues are fully integrated into national development processes and that persons with disabilities enjoy equal opportunities and protection from discrimination.

The Council's core mandate includes advocating for the rights and dignity of persons with disabilities, monitoring the implementation of relevant laws, policies, and programmes, and advising the Government on disability inclusion. It also plays a central role in promoting non-discrimination and equal access to services and opportunities across all sectors.

In fulfilling its mandate, the NCPD undertakes several key functions. It provides policy oversight and coordination to ensure that disability considerations are mainstreamed in sectors such as education, health, employment, and infrastructure. It also promotes awareness to address stigma and discrimination, supports capacity building for institutions and communities to adopt inclusive

practices, and monitors progress on disability inclusion in line with national priorities and international commitments, including the UN Convention on the Rights of Persons with Disabilities.

Institutionally, the NCPD operates at multiple levels, with national-level coordination complemented by district and sector structures that support implementation and community engagement. This decentralized approach enhances responsiveness and ensures that disability inclusion is addressed at the grassroots level.

The Council is particularly relevant to development programmes, as it ensures that projects are designed and implemented in an inclusive and accessible manner, taking into account the needs of persons with disabilities and complying with national social inclusion standards. Overall, the NCPD plays a critical role in ensuring that Rwanda's development is inclusive and that no one is left behind.

4.5.4.3. Justice and Protection

In the area of justice and protection core institutions include:

a) ***National Public Prosecution Authority (NPPA).*** **This** is mandated to prosecute cases related to GBV, child abuse, and other social offences, ensuring accountability and access to justice.
b) *The* ***Rwanda National Police (RNP)*** is responsible for law enforcement, including operating specialized GBV desks and protecting vulnerable groups.
c) *The* ***National Commission for Human Rights (NCHR)***. This is mandated to promote and safeguards human rights, with a focus on social justice, equality, and protection against abuse.

Together, these institutions form an integrated system that combines policy implementation, service delivery, enforcement, and community participation to address social issues effectively in Rwanda.

5. Potential Environmental, Social, and Socioeconomic Benefits and Impacts of the Rwanda Integrated Sustainable Transport Program (RISTP)

This chapter presents the potential environmental, social, and economic benefits of the Rwanda Integrated Sustainable Transport Program (RISTP) Result Based Program. The benefits and risks assessed are for the whole government program (small 'p') under NST-2 and TSSP, with the attention for the proposed RBP as defined in Figure 2. If during this assessment, there are found potential high-risk activities that would have potential adverse E&S impacts, the proposed exclusion criteria will be applied to ensure that the RBP boundary is only for the activities funded by the Program (big "P") as per AIIB ESF requirements for RBF.

5.1. Social Economic Benefits of the Proposed RBP –RISTP

The Rwanda Integrated Sustainable Transport Program (RBP–RISTP) is expected to generate significant social and economic benefits for a wide range of transport users, including rural and urban communities, passengers, freight operators, and businesses relying on national roads, feeder roads, and airports. The program will address key transport sector challenges, including limited paved road coverage, weak feeder road connectivity, infrastructure gaps, and the vulnerability of transport systems to climate-related hazards such as flooding and landslides. It will also help improve transport safety, address operational challenges in the aviation sector, and strengthen infrastructure maintenance and resilience.

For instance, the proposed road work is particularly important for both national and local development. Paved national roads form part of strategic transport corridors that enhance regional and cross-border connectivity with neighboring countries such as Burundi, DRC, and Uganda, thereby facilitating trade, mobility, and access to key logistics routes. They also support agricultural and industrial value chains by connecting productive farming areas, markets, industrial parks, agro-processing facilities, and trading centers.

At the local level, feeder roads play a critical role in linking rural communities to markets, enabling the transport of agricultural produce, and improving access to essential services such as schools, health facilities, and administrative centers. In addition, improved road infrastructure will enhance access to tourism destinations, border posts, and other economic hubs. Overall, the maintenance and improvement of roads under the RBP–RISTP will strengthen regional integration, improve mobility and economic efficiency, support rural livelihoods, enhance access to social and economic opportunities, and contribute to the development of a more resilient, efficient, and diversified transport system in Rwanda.

On the other hand, the regional airport investments will broaden the Program's impact beyond Kigali by promoting balanced regional development and improving national connectivity. Enhancements at Musanze Aerodrome will strengthen access to the Volcanoes National Park

tourism corridor, boost tourism and business opportunities, and improve connectivity between Kigali and Northern Rwanda. At Kamembe Airport, upgrading the Rescue and Fire Fighting Service (RFFS) from Category 6 to Category 7 will improve operational safety, accommodate larger aircraft, and facilitate growth in passenger traffic, trade, and investment in the Western Province. Collectively, these investments will enhance Rwanda's airport network, strengthen domestic and international connectivity, support tourism and economic development, and reinforce the country's position as a regional transport and logistics hub.

The aviation safety and security interventions will strengthen compliance with applicable ICAO Standards and Recommended Practices (SARPs) and Rwanda Civil Aviation Authority (RCAA) regulations. Planned investments include upgrading Musanze Aerodrome to meet international aerodrome design standards, enhancing the Rescue and Fire Fighting Service (RFFS) at Kamembe Airport from Category 6 to 7, implementing an Information Security Management System (ISMS) aligned with ISO/IEC 27001, introducing Airport Collaborative Decision Making (A-CDM), and adopting enterprise risk management in line with ISO 31000. Together, these measures will improve airport safety, cybersecurity, operational efficiency, emergency preparedness, and the resilience of Rwanda's aviation sector.

5.2. Potential Environmental Impact of Proposed Road Works under the RBP

Road Works: ESSA has established that the proposed road works under the Rwanda Integrated Sustainable Transport Program (RBP) mainly involve ***periodic maintenance and improvement of existing feeder roads, paved national roads, and selected unpaved national roads***. Since all interventions are within existing road corridors and no Greenfield development is anticipated, the associated environmental impacts are expected to localized, medium is scale with moderate risk and can be managed by a good ESMP. However, **Rwanda's mountainous terrain, high rainfall intensity, and proximity of some roads to environmentally and ecologically sensitive areas may increase certain risks if not properly managed as detailed below.**

Soil Erosion, Surface Runoff, and Sedimentation: Road maintenance activities such as grading, excavation, re-gravelling, drainage improvement, and rehabilitation of unpaved roads may disturb soil surfaces, particularly in steep and hilly areas. This may increase surface runoff, leading to soil erosion, sedimentation of rivers and wetlands, localized flooding, and potential damage to nearby agricultural land, properties, and infrastructure. These risks are particularly significant in Rwanda's mountainous and highland landscapes.

a) ***Air Pollution, Dust, Noise, and Vibration Impacts:*** Construction activities such as earthworks, hauling of materials, rehabilitation works, and operation of heavy machinery may generate dust, air emissions, noise, and vibration, particularly along unpaved feeder roads and gravel national roads. Dust and vehicle emissions may temporarily reduce air quality and affect

nearby settlements, agricultural areas, roadside vegetation, and workers' health. Similarly, noise and vibration from construction equipment and vehicles may disturb nearby communities, schools, health facilities, and wildlife. These impacts are expected to be temporary, localized, and manageable with proper mitigation measures.

b) ***Landslides, Slope Instability, and Water Pollution Risks:*** Given Rwanda's hilly and mountainous terrain, road works in steep or unstable areas may increase the risk of landslides, slope failures, and embankment collapse, especially during heavy rainfall. Activities such as excavation, vegetation clearance, and poor drainage management can worsen slope instability, posing risks to communities, infrastructure, and road users. In addition, roads located near rivers, wetlands, marshlands, and drainage systems may face risks of water pollution and hydrological disruption. Construction runoff, sediment discharge, improper spoil disposal, fuel leaks, and waste generation may degrade water quality, increase sedimentation, and alter natural drainage patterns, affecting wetlands and surrounding water resources.

c) ***Biodiversity, Habitat Disturbance, and Sensitive Environmental Areas:*** Although most project roads pass through existing developed or agricultural landscapes, some road corridors are located near and/or pass through environmentally sensitive ecosystems such as forests, wetlands, rivers, marshlands, biodiversity zones, and protected landscapes. Road rehabilitation work may lead to temporary habitat disturbance, soil degradation, and increased human access to ecologically sensitive areas, which could negatively affect biodiversity conservation. Poorly managed maintenance or rehabilitation activities may also contribute to habitat degradation, water pollution, wetland disturbance, and increased encroachment into sensitive environmental zones. These risks require appropriate planning, environmental management measures, and site-specific mitigation, particularly in areas of ecological significance. However, the anticipated impacts are expected to be localized, temporary, and of moderate significance, and are generally consistent with routine road maintenance and rehabilitation activities.

d) ***Waste Generation and Pollution Risks:*** Road maintenance and rehabilitation activities are likely to generate construction waste, excavated materials, used oils and lubricants, packaging waste, and wastewater. If not properly managed, these waste streams may contaminate soil, surface water, and groundwater resources, leading to localized environmental pollution. However, the anticipated impacts are expected to be site-specific, temporary, and manageable through the implementation of established waste management practices, pollution prevention measures, and environmental mitigation controls.

e) ***Climate and Disaster Risks:*** Rwanda is vulnerable to climate-related hazards such as heavy rainfall, flooding, erosion, and landslides. Road works, especially in mountainous areas, may increase infrastructure vulnerability if climate-resilient measures are not integrated into drainage systems, slope stabilization, and road engineering design

5.3. Occupational Health and Safety (OHS) Risks Associated with Road Works

During implementation of the RBP, several occupational health and safety (OHS) risks may arise, particularly during construction and transport-related activities. Key risks include:

a) ***Exposure to moving machinery, equipment, and traffic-related accidents****,* which may increase the risk of collisions, entanglement, crush injuries, and incidents involving workers, vehicles, and heavy construction equipment operating within and around project sites. This also includes aspects of traffic safety during the operation of improved roads offering relatively higher speeds.
b) ***Unsafe working conditions and falls from heights****,* including inadequate supervision, poor site management, limited adherence to safety procedures, and risks associated with elevated construction activities, bridge works, and material handling at height.
c) ***Electrical hazards and handling of hazardous materials***, including accidental contact with power lines, faulty equipment, unsafe electrical installations, and exposure to fuels, chemicals, and other construction-related substances that may pose health and safety risks.
d) ***Exposure to dust, noise, and vibration****,* which may lead to respiratory problems, hearing impairment, and other long-term occupational health impacts.
e) ***Worker fatigue, physical strain, and inadequate emergency response arrangements****,* particularly due to long working hours, repetitive tasks, insufficient rest periods, and weak preparedness to respond to accidents, injuries, or workplace incidents.

Overall, if not effectively managed, these risks may negatively affect worker health, safety, productivity, and overall project performance. However, the impacts are localized, medium is scale with moderate risk and can be managed by a good ESMP.

5.4. Social Risks and Impacts Associated with the Proposed Roads under the RBP

The proposed RBP may generate several social risks and impacts, particularly during road construction, rehabilitation, and related infrastructure works. These risk and impacts are detailed below:

a) ***Land acquisition and resettlement****:* The proposed road works will largely be confined within existing road corridors, thereby minimizing the need for land acquisition and resettlement. However, in a limited number of sections where road safety improvements, realignment, widening, or drainage works are required, physical and/or economic displacement of Project Affected Persons (PAPs) may occur, affecting livelihoods, assets, and access to land. In addition, delays in compensation payments may arise due to administrative approval processes at the District or City of Kigali levels, potentially affecting timely project implementation and community trust
b) ***Community health and safety risks****:* The project may also create **community health and safety risks**, including increased traffic accidents, noise pollution, restricted access, and unsafe

construction zones that may affect nearby communities, pedestrians, and road users. In addition, **labour and working condition risks** may arise, such as unfair labour practices, poor working conditions, occupational health and safety concerns, and challenges related to labour influx. These may place pressure on local services and increase social tensions if not properly managed.

c) ***Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and child protection concerns****:* Another important social risk relates to **GBV, SEA, and child protection concerns**, which may increase due to labour influx and interactions between workers and local communities. Vulnerable groups, including women and children, may face heightened risks if proper safeguards are not in place.

d) ***Risk of Exclusion and Discrimination in Access to Training Opportunities:*** The Ministry of Infrastructure will implement a comprehensive capacity-building program aimed at strengthening human resources across Rwanda's transport sector. The program is expected to benefit approximately 800 personnel from various transport institutions, including the New Kigali International Airport (NKIA) workforce. Training will cover a broad range of specialized areas, such as Air Traffic Control, Accident and Incident Investigation, Aeronautical Data and Information Management, Engineering and Maintenance, and Airport Operations and Compliance, among others.

   A potential risk is that, in the absence of clear and transparent selection criteria, access to these training opportunities may not be equitably distributed, potentially disadvantaging women, persons with disabilities, junior staff, and other underrepresented or vulnerable groups. To mitigate this risk, the RBP will establish and implement fair, transparent, and merit-based procedures for the nomination and selection of trainees. These procedures will incorporate principles of inclusiveness and equal opportunity to ensure that capacity-building benefits are accessible to all eligible staff across participating institutions.

5.5. Environmental, OHS, and Social Risk Mitigation Measures for Road Works

To proactively address these environmental, occupational health and safety (OHS), and social risks, the RBP should implement the following measures:

a) **E&S Screening of Sub-projects:** The PIUs shall undertake Environmental and Social (E&S) screening of all proposed subprojects and activities to ensure the exclusion of Category A/High-Risk activities, in accordance with the General Guidelines and Procedures for Environmental Impact Assessment (EIA), the relevant Ministerial Orders on Environment, and the requirements of the Results-Based Financing (RBF) framework. The PIUs shall consolidate the screening results and incorporate them into the Annual Work Plan and Budget (AWPB) submitted to the World Bank in the third quarter (Q3) of year Y0, for activities planned for implementation in the subsequent year (Y+1).

b) **Integrate ESHS requirements into procurement and contract documents** to ensure contractors are legally and operationally accountable for compliance with environmental, labour, social and safety standards.
c) **Allocate adequate budget and human resources for ESHS management**, including recruitment of qualified ESHS personnel, regular risk assessments, and continuous safety training to strengthen workplace safety and risk prevention.
d) **Establish robust internal monitoring and reporting systems** to ensure contractor compliance with national labour, OHS, and environmental regulations. This should include regular inspections, contractor performance monitoring and management including implementation of contractual remedies where necessary, timely accident and incident reporting and management, and enforcement of corrective actions.
e) **Strengthen coordination between RTDA inspectors and Labour Inspectors** to improve oversight, workplace inspections, compliance assessments, accident investigations, and implementation of corrective measures.
f) **Promote a preventive safety culture across project sites** through regular awareness/ sensitization and training programs, enforcement of Codes of Conduct, and continuous engagement with workers and contractors on occupational safety and labour standards.
g) **Establish functional worker grievance mechanisms** to address labour-related concerns, workplace disputes, and complaints in a timely and transparent manner.
h) **Manage social risks through implementation of Resettlement Action Plans (RAPs)**, timely compensation, livelihood restoration measures, and strengthened referral and support systems for vulnerable groups affected by project activities.
i) **Implement traffic management and community safety measures** to reduce road safety risks, minimize disruptions, and protect surrounding communities during road construction works, during the operational phase of the subprojects.
j) **Ensure continuous compliance monitoring and institutional collaboration** to improve accountability, strengthen regulatory compliance, and maintain effective environmental, OHS, and social risk management throughout project implementation.

Overall, with effective implementation of these mitigation measures, the environmental, OHS, and social risks associated with the proposed RBP are expected to remain moderate since the risks and impacts are predictable, and could be managed with readily available measures including those that will be included in the project design (improved roads safety and drainage capacity) and the site specific ESIAs and ESMPs that will be prepared for the respective subprojects.

5.6. Potential Environmental, Social, and Safety Risks Associated with Airport Operational Efficiency and Safety Enhancements

The ESSA determined that the RBP will support the upgrading of selected airports to enhance operational efficiency, safety, and security in Rwanda's aviation sector. Planned investments include the procurement of electric vehicles to improve airport logistics and ground operations, deployment of digital systems for airport operations and safety monitoring, and training of airport personnel on the operation and maintenance of new systems and equipment. The Program will also strengthen emergency preparedness through investments in rescue and firefighting infrastructure. At Kamembe Aerodrome, the Program will upgrade the Rescue and Fire Fighting Service (RFFS) from Category 6 to Category 7 in accordance with International Civil Aviation Organization (ICAO) standards through the procurement of two Rescue and Fire Fighting (RFF) vehicles. These investments are expected to enhance airport safety, improve operational efficiency, accommodate larger aircraft, and strengthen the resilience and reliability of Rwanda's airport network.

As these interventions primarily involve the procurement and installation of equipment rather than major civil works, they are not expected to generate significant environmental or social impacts during implementation. The principal environmental risk relates to the **generation of electronic waste (e-waste) at the end of the operational life of the procured equipment**. Digital monitoring systems, electronic communication devices, computer hardware, batteries, sensors, and associated electronic components will eventually become obsolete or non-functional and require replacement. Similarly, electric vehicles contain lithium-ion batteries and electronic control systems that, if not properly managed, may contribute to hazardous waste streams due to the presence of heavy metals, electrolytes, plastics, and other potentially hazardous materials.

Although these wastes will only arise after several years of operation, they may increase the volume of e-waste generated by the aviation sector if appropriate end-of-life management arrangements are not in place. Inadequate storage, dismantling, recycling, or disposal of obsolete electronic equipment and batteries could result in contamination of soil and water resources, occupational health and safety risks to workers handling the waste, and the loss of valuable recyclable materials. The risk is considered low given the relatively small quantity of equipment to be procured and Rwanda's existing legal framework for electronic waste management. Nevertheless, the Program should ensure that all obsolete electronic equipment, batteries, and electrical components are managed in accordance with Rwanda's e-waste management regulations and through licensed collection, recycling, or disposal facilities. Procurement specifications should also encourage suppliers to provide equipment with longer service life, energy efficiency, availability of spare parts, and, where feasible, take-back or end-of-life product stewardship arrangements to minimize future e-waste generation.

In addition, procurement specifications should also incorporate **Extended Producer Responsibility (EPR)** requirements, where feasible, requiring suppliers or manufacturers to take responsibility for the collection, take-back, refurbishment, recycling, or environmentally sound disposal of equipment at the end of its service life. Applying the EPR principle promotes environmentally sound lifecycle management of electronic equipment, reduces the burden on public waste management systems, encourages resource recovery and circular economy practices, minimizes the release of hazardous substances into the environment, and provides an incentive for

manufacture design more durable, repairable, and recyclable products. Procurement specifications should further encourage equipment with longer service life, high energy efficiency, availability of spare parts, and manufacturer-supported maintenance to reduce future e-waste generation. EPR is consistent with the Basel Convention guidance on e-waste, and Rwanda's e-waste regulations.

5.7. Capacity of RBP Implementing Institutions to Mainstream Environmental and Social (E&S) Aspect in Operation

Presented below are the RBP implementing institutions, their mandates, E&S capacities, and their roles in mainstreaming and implementing environmental and social (E&S) under the proposed RBP operation.

5.7.1. The Ministry of Finance and Economic Planning (MINECOFIN)

The Ministry is responsible for formulating macroeconomic policies, mobilizing resources, coordinating development partners, and allocating budgets across ministries and sectors. It also provides oversight and guidance on the establishment of national funds, including those related to environment and forestry. In addition, MINECOFIN plays a key role in mainstreaming natural resource and environmental considerations into national planning and budgeting processes, including the Poverty Reduction Strategy Paper (PRSP) and District Development Plans (DDPs).

5.7.2. Rwanda Ministry of Infrastructure (MININFRA) E&S Capacity

Core Functions: The core function of the Ministry of Infrastructure is to ensure sustainable infrastructure development across key sectors, including transport, energy, water supply and sanitation, housing, and human settlements, with the aim of driving Rwanda's economic growth and improving the quality of life of its citizens. This is achieved through the development and review of guiding policies, strategies, and relevant legal frameworks, as well as the monitoring and evaluation of infrastructure projects and providing overall oversight of all infrastructure sectors.

Experience in Working with Multilateral Development Banks (MDBs): The Ministry has experience in collaborating and working with MDBs. Most recently, with support from World Bank is the **Rehabilitation**, **Upgrading, and Multi-Year Maintenance of Indicative Feeder Roads Project in Nyabihu District, covering approximately 93 km**. The project aimed to improve rural infrastructure to enhance connectivity, facilitate the movement of goods and people, reduce travel time, and lower transport costs. Key activities included rehabilitation and upgrading of carriageway pavements to standardized widths, construction and rehabilitation of bridges, drainage works, and maintenance of the upgraded infrastructure. In addition, the Ministry recently implemented institutional support and capacity-building initiatives in the transport sector, through which teams from MININFRA and City of Kigali received training on electric mobility.

Environmental and Social Capacity: The ESSA revealed that the Ministry currently does not have a dedicated department, unit, or personnel responsible for managing environmental and social (E&S) issues. Instead, E&S considerations are integrated into the Ministry's operations through the recruitment of environmental and social personnel on a project-specific basis, depending on the nature and requirements of the project being implemented at the Ministry level. For example, the Rwanda Urban Development Project engaged Environmental and Social Safeguards Specialists to oversee and manage E&S aspects of project implementation. These are normally coordinated by the Policy and Planning Department.

Management of Labour in Previous Civil Works Projects

RTDA reported that it has managed labour-related issues in previous civil works projects through a combination of contractual obligations, regulatory compliance, and continuous supervision, aligned with national labour laws and good international industry practice (GIIP). Contractors are required to implement Labour Management Procedures (LMPs) and comply with ESMPs, which address fair employment practices, non-discrimination, workers' rights, and occupational health and safety (OHS). Workers are engaged under formal contracts, registered with the Rwanda Social Security Board, and provided with personal protective equipment (PPE), safety training, and access to first aid and medical services.

To address workplace concerns, RTDA requires contractors to establish worker specific GRMs for handling issues such as wages, working conditions, and labour disputes. Compliance is monitored through regular site inspections and audits by RTDA safeguards staff, supervising consultants, and regulatory authorities, including the Rwanda Labour Inspectorate. Contractors are also required to adopt Codes of Conduct covering GBV, SEA, and child protection, supported by awareness programs for workers and nearby communities.

Through these measures, RTDA has effectively managed labour-related risks, promoted safe and fair working conditions, and maintained compliance with national regulations and development partner requirements. Continuous monitoring and enforcement have been critical in addressing contractor-related challenges and strengthening labour standards across projects.

Grievance Management Related to Project Execution. The ESSA found that MININFRA currently lacks a formal Feedback and Complaints Handling Mechanism, commonly referred to as a Grievance Redress Mechanism (GRM), at the Ministry level. This is largely because the Ministry is not directly involved in project implementation; GRMs are typically managed by its affiliated agencies, while MININFRA plays a coordination role at the policy level. Although the Ministry has handled complaints, mainly related to expropriation, responsibility for addressing such issues is generally delegated to affiliated agencies, with MININFRA intervening only when matters exceed their capacity. However, given MININFRA's direct role in implementing RBP capacity

building activities, including training in areas such as Air Traffic Control, Accident and Incident Investigation, Aeronautical Data and Information Management, Engineering and Maintenance, and Airport Operations and Compliance, benefiting more than 800 individuals, including the NKIA workforce, establishing a functional GRM at the Ministry level is necessary.

5.7.3. Rwanda Transport Development Agency (RTDA)

This section provides an overview of the Rwanda Transport Development Agency (RTDA), including its mandate, organizational structure, key functions, and role in the planning, development, and management of transport infrastructure in Rwanda.

5.7.3.1. Core Function and Planned Intervention under RBP

The Rwanda Transport Development Agency (RTDA) is a public institution under the supervision of the MININFRA, mandated to oversee the development, management, and maintenance of Rwanda's transport infrastructure. Its responsibilities span key subsectors, including roads, railways, cable cars, and inland waterways, contributing to national economic growth, regional connectivity, and sustainable mobility while ensuring compliance with environmental and social requirements.

RTDA's core functions include implementing government transport infrastructure policies; planning, procuring, supervising, and maintaining transport infrastructure projects; managing the national road network to enhance safety, efficiency, and sustainability; coordinating infrastructure development at national and decentralized levels; collecting and managing transport data; promoting road safety and axle load regulation; supporting research and innovation; and collaborating with regional and international institutions in the transport sector.

Planned Interventions under the RBP: Under the proposed Program, RTDA is expected to implement key interventions, including rehabilitation and periodic maintenance of national roads, upgrading and maintenance of feeder roads, climate-resilient infrastructure improvements, spot interventions such as drainage works, culverts, and slope stabilization, road safety enhancements including signage and pedestrian facilities, as well as institutional capacity strengthening.

Note: RTDA confirmed that under the proposed RBP, no new road corridors outside existing alignments are proposed. All interventions will be limited to rehabilitation and upgrading within existing rights-of-way, with only **minor localized land acquisition anticipated in certain sections for safety improvements, drainage works, or road widening.** Where required, such impacts will be managed through proportionate safeguard instruments in line with national environmental and social requirements.

5.7.3.2. Experience in Working with Multilateral Development Banks (MDBs)

The Rwanda Transport Development Agency (RTDA) has extensive experience in implementing infrastructure projects financed by Multilateral Development Banks (MDBs) and other international development partners, including the World Bank Group, African Development Bank (AfDB), OPEC Fund, BADEA, Korea Exim Bank, and China Exim Bank. This long-standing engagement has significantly strengthened RTDA's institutional capacity in environmental and social safeguards management, procurement, contract administration, and delivery of infrastructure projects in line with international standards.

(a) **World Bank Group**: With World Bank financing, RTDA has implemented several major transport infrastructure projects that applied international environmental and social safeguard requirements. These include the completed Kibugabuga–Shinga–Gasoro Road Project (66.56 km), which improved regional connectivity, facilitated trade, and enhanced access to social and economic services. The project involved the preparation and implementation of ESIAs and Resettlement Action Plans (RAPs), ensuring compliance with both national regulations and World Bank standards. RTDA also implemented the Rwanda Feeder Roads Development Project, covering approximately 450 km across multiple districts. This project improved rural accessibility, reduced transport costs, and strengthened agricultural value chains while applying the World Bank's Environmental and Social Framework (ESF), including land acquisition, stakeholder engagement, grievance redress, occupational health and safety, and environmental risk management measures.

(a) **AfDB:** Under the African Development Bank portfolio, RTDA has delivered major projects such as the Kigali Urban Transport Improvement Project, which focuses on urban mobility, road infrastructure, and traffic management in Kigali City, as well as the Burundi–Rwanda Integrated Development Project aimed at improving cross-border connectivity and regional integration. These projects are implemented under the AfDB's Integrated Safeguards System (ISS), which guides environmental and social risk management, stakeholder engagement, and compliance monitoring.

(a) **OPEC Fund and BADEA:** RTDA has also implemented projects financed by the OPEC Fund and BADEA, notably the Nyabugogo–Nyacyonga–Mukoto Road Project, which involves upgrading a strategic corridor connecting urban and peri-urban areas. The project includes land acquisition, compensation of Project Affected Persons (PAPs), and implementation of environmental and social mitigation measures. Similarly, through Korea Exim Bank financing, RTDA is implementing the Kigali–Muhanga Road Project, which includes road rehabilitation, widening, drainage improvements, and road safety enhancements. Environmental and social risks under this project are managed through ESIAs, Environmental and Social Management Plans (ESMPs), and RAPs, where applicable, in line with national regulations and international good practice.

Details of recently implemented and ongoing road projects by RTDA, including their funding sources, are provided in Annex 5. Implementation of the specified projects are guided by key safeguard instruments, including ESIAs, ESMPs, RAPs, and the Grievance Redress Mechanism (GRM), which reflect good practice in ensuring compliance with the project's environmental and social requirements.

Overall, RTDA has developed strong institutional capacity in environmental and social risk management, including preparation and implementation of ESIAs, ESMPs, and RAPs, stakeholder engagement, grievance redress mechanisms, occupational health and safety compliance, and coordination with regulatory authorities. This cumulative experience demonstrates RTDA's ability to effectively plan and implement MDB-financed infrastructure projects while ensuring compliance with both international safeguard standards and Rwanda's legal and institutional framework.

Note: *It is worth noting that, despite this extensive experience, RTDA has not yet implemented road infrastructure projects under an RBP financing arrangement.*

5.7.3.3. RTDA Statutory Compliance with Occupational Health, Safety, and Labour Requirements

RTDA reported that its projects are regularly subjected to statutory inspections by relevant authorities to assess compliance with Environmental, Health, Safety, and Social (EHSS) requirements during civil works. REMA primarily conducts environmental compliance inspections to verify adherence to ESIAs and ESMPs, while the Rwanda Labour Inspectorate and/or Rwanda Social Security Board oversee compliance with occupational health, safety, and labor standards. In addition, Rwanda Mines, Petroleum and Gas Board (RMGB inspects ancillary sites such as quarries, borrow pits, and dumping sites for ESHS compliance. These inspections are conducted periodically during construction and complemented by routine supervision from RTDA's safeguards team and supervising consultants, with corrective actions implemented as needed. Between 2015 and 2025, the agency recorded 10 fatalities across road projects financed by the World Bank and the AfDB.

5.7.3.4. RTDA Environmental and Social Human Resource Capacity

The RTDA has an established Compliance and Safeguards Unit as part of the Single Project Implementation Unit (SPIU) responsible for managing E&S risks across transport infrastructure projects. The program is staffed by a multidisciplinary team of approximately 21 professionals, including Environmental and Social Safeguards Officers and Specialists, a Gender Specialist, and a Community Development Officer (Annex 2). The Unit is headed by a Program Manager.

The unit oversees the screening, preparation, implementation, and monitoring of key safeguard instruments, including ESIAs, ESMPs, and RAPs. It also manages stakeholder engagement, grievance redress mechanisms (GRMs), occupational health and safety compliance, and coordination with contractors and supervising consultants.

In addition, the Program collaborates closely with national authorities and development partners to ensure compliance with Rwanda's environmental and social regulatory requirements and international standards. This structured approach enables RTDA to systematically manage E&S risks throughout the project lifecycle, from planning and design to construction and implementation.

5.7.3.5. Grievance Management Related to Project Execution

The RTDA has established and operationalized a Grievance Redress Mechanism (GRM) to manage feedback, complaints, and disputes arising from infrastructure projects, particularly those related to land acquisition, compensation, resettlement, and construction impacts. The GRM is aligned with Rwanda's legal framework, including the Expropriation Law No. 32/2015, as well as international standards such as the World Bank Environmental and Social Standard 5 (ESS5), ensuring grievances are addressed in a timely, transparent, fair, and culturally appropriate manner.

The mechanism operates through a structured multi-tier system that addresses grievances at the lowest possible level. At the community level, Grievance Redress Committees (GRCs), composed of representatives of Project Affected Persons (PAPs), handle initial complaints. Unresolved cases are escalated to Sector and District Level Committees, followed by RTDA's Project Implementation Unit (PIU) for higher level resolution. Complex cases may be referred to a national-level Steering Committee, while complainants retain the right to seek judicial remedies.

The GRM covers a wide range of issues, including compensation disputes, land ownership, valuation, eligibility, livelihood restoration, and construction related impacts. It also incorporates traditional dispute resolution mechanisms, such as the ***'Abunzi'*** mediation system, to facilitate amicable settlement at the community level. Complaints are formally recorded, tracked, and monitored through grievance logs, with defined timelines for response, resolution, and reporting.

In addition, the GRM includes procedures for handling sensitive cases such as Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Violence Against Children (VAC), with referral pathways to specialized support services. Overall, this structured and inclusive mechanism strengthens accountability, transparency, and stakeholder trust throughout project implementation.

The most common reported grievances during project implementation are mainly related to **land acquisition, compensation, and construction impacts**. These include disputes over valuation

rates, land ownership and boundary conflicts, misidentification or omission of affected assets, and delays in compensation payments. Construction-related complaints commonly involve dust, noise, restricted access, inadequate stormwater management affecting nearby properties, and cases where contractors extend works beyond compensated boundaries, impacting unvalued or uncompensated assets.

5.7.3.6. Key Lessons Learned from MDB-Financed Projects

Drawing from its experience in projects financed by development partners such as the World Bank, African Development Bank, and others, RTDA has identified several important lessons in environmental and social (E&S) management.

(a) ***Importance of Early and Integrated Safeguards Planning****:* A major lesson is the importance of **early and integrated safeguards planning**. Projects where Environmental and Social Impact Assessments (ESIAs) and Resettlement Action Plans (RAPs) were aligned with finalized engineering designs experienced smoother implementation, fewer design changes, and reduced delays. In contrast, safeguards prepared using preliminary designs often resulted in scope revisions, increased numbers of Project Affected Persons (PAPs), and implementation challenges. This highlights the need for stronger coordination between engineering and safeguards processes.

(b) ***Early and Proactive Land Acquisition and Expropriation Processes:*** Another key lesson relates to **financing for land acquisition and compensation**. Projects where compensation costs were integrated into project financing mechanisms had more predictable implementation, while those dependent on Government counterpart funding often faced delays due to budget constraints, affecting compensation timelines, project schedules, and community relations. Securing reliable and timely financing for compensation is therefore critical.

(c) ***Delays in Land Acquisition and Expropriation Processes:*** Land acquisition and expropriation processes have also affected project timelines. Delays in approval of expropriation files at decentralized levels slowed compensation and commencement of works. Early engagement and stronger coordination with District authorities have proven essential to improve efficiency.

(d) ***Importance of Meaningful Stakeholders Consultation and Grievance Management:*** Stakeholder engagement and grievance management are equally important. Projects with continuous communication and functional Grievance Redress Mechanisms (GRMs) were more effective in managing expectations, resolving disputes, and maintaining community trust. Similarly, strong contractor supervision is necessary to ensure compliance with Environmental and Social Management Plans (ESMPs), Occupational Health and Safety (OHS) standards, and labor requirements.

Observed Challenges: A recurring challenge has been **limited technical capacity at decentralized levels**, particularly in safeguards implementation, valuation review, and

monitoring. This underscores the need for continuous capacity building and technical support to local authorities.

From an environmental perspective, **integrating climate resilience and geotechnical considerations** including stormwater management, slope stabilization, and erosion control has proven critical, particularly given Rwanda's terrain and climate variability. Projects that addressed these issues early demonstrated greater durability and reduced long-term risks.

To improve outcomes, RTDA identified key priority actions, including: early finalization of engineering designs, integration of compensation financing within project budgets, streamlined approval processes, stronger contractor oversight, improved contingency planning, enhanced data management, and expanded capacity-building initiatives.

Overall, these lessons show that while RTDA has a strong E&S management foundation, project performance can be further improved through early planning, stronger financing arrangements, institutional coordination, and continued capacity strengthening to align with national requirements and good international industry practice.

5.7.4. Evidence of OHS Integration in Selected Ongoing Projects Observed During Field Visits

5.7.4.1. Nature of Planned Interventions and Associated Safeguard Risks and Issues

The Consultants conducted site visits to the proposed RBP roads to appreciate their nature and scale, as well as to understand the existing challenges that the RBP seeks to address. The field visits also provided an opportunity to observe active construction sites, enabling the consultants to assess on-the-ground conditions and evaluate the adequacy of contractors' integration of OHS measures into civil works activities. In addition, the visits created a platform for in-depth discussions with contractors and RTDA staff on the scope of planned civil works and key environmental and social safeguard challenges.

Nature and Scale of the Proposed Civil Work under Component One (Road Works): The ESSA established and confirmed that RTDA plans to undertake rehabilitation and periodic maintenance of national roads, upgrading and maintenance of feeder roads to improve accessibility, and climate-resilient infrastructure improvements to address environmental and weather-related risks. The Program will also support targeted interventions such as drainage works, culverts, and slope stabilization to address localized infrastructure challenges, alongside road safety enhancements, including signage and pedestrian facilities. In addition, the RBP will also support the installation of lay-bys, guardrails, and roadside safety barriers, including vehicle restraint barriers and crash

protection barriers, particularly along sharp curves, winding road sections, and other high-risk areas and ecologically sensitive areas such as Nyungwe National Park to enhance road safety and reduce traffic accident risks. Generally, ESSA has found that ***the selected roads under Component 1 have justified need for the proposed interventions.***

The field visits covered ***the Kigali–Gatuna Road (78 km), the Huye–Nyamagabe–Buhinga–Rusizi National Roads (123 km), and the Nyamakecuru quarry site.*** During these visits, the ESSA team observed critical problematic areas (selected spots), allowing them to better understand the pressing infrastructure issues and assess potential environmental and social safeguard challenges that may arise from the proposed intervention. The key challenges identified include road sections that experience heavy traffic congestion, poor drainage and persistent waterlogging, road subsidence, road failure and deterioration, water erosion and pavement damage, as well as road safety concerns associated with unstable road sections and inadequate protective infrastructure (Table 2).

Most of these interventions are expected to be confined within existing road corridors. However, in some cases, activities such as road widening, realignment, and construction of drainage structures may be required to improve road safety and strengthen resilience to environmental and climate-related risks. These activities may trigger minor physical and economic displacement of Project Affected Persons (PAPs), particularly in areas with human settlements and livelihood activities located along the road corridors.

The RTDA team indicated that to mitigate physical and economic displacement risks, the agency will apply the Expropriation Law, prepare and implement Resettlement Action Plans (RAPs), provide compensation at replacement cost, and implement livelihood restoration measures for affected persons. A functional Grievance Redress Mechanism (GRM) will also be maintained to address concerns in a timely and transparent manner. The anticipated impacts will mainly be related to occupational health and safety, construction waste, erosion due to undamaged storm water, labour related issues and spread of STDs. These impacts are low to moderate, site specific and can be well managed through known E&S risk management practices through implementing functional ESMPs. In addition, RTDA demonstrated their experience in working with multilateral financial institutions and have developed some capacities to integrate E&S matters in their operations.

5.7.4.2. Integration of OHS Safeguard Practices on Some Ongoing Active Construction Sites

Across the active road construction sites which were covered during the assessment, the ESSA established notable gaps in the implementation of OHS practices. In several cases, construction workers were not adequately provided with personal protective equipment (PPE), and road works were not properly segregated from other road users, increasing risks to both workers and the public. The assessment also observed inadequate safety signage, limited warning systems, and insufficient

speed control measures around construction zones, which further heightened traffic and public safety risks. Given the challenging road terrain, characterized by steep slopes, sharp corners, and mountainous sections, safety considerations are critical during both construction and operation phases and should be adequately reflected in engineering designs. In addition, soil erosion control and stormwater management emerged as key design and safeguard considerations. Overall, observations from the sampled ongoing works highlighted the need to strengthen OHS compliance, public safety measures, including signage and speed limits, and environmental risk management.

Table 2: Some Selected Critical Areas Requiring Improvements and Safeguards Challenges

Road Section	Challenge and Planed Interventions	Possible Safeguard Issues
Kigali–Gatuna Road (78 Km): *This is a Paved National Road Linking Rwanda to Uganda and Serves as a Key International Transport Corridor. The Road Traverses Three Districts—Gasabo (Karuhuma Area), Rulindo, and Gicumbi—Facilitating Regional Connectivity and Trade*		
Jali Access Road	This unpaved junction experience heavy congestion as it connect to the main road (Kigali –Gatuna Road). About 60m of access road will be paved.	The area is an active business center, and construction activities may cause temporary disturbances such as dust, noise, and potential structural impacts, including house cracks resulting from vibrations caused by heavy construction machinery as well as OHS hazard risks and impact. However, no resettlement is anticipated, as the proposed road width can be accommodated within the existing road corridor.
7 + 300 (Karuruma area)	The area remains persistently wet and extends for approximately 300 meters. Construction of a main drainage system is planned to address the drainage challenge and improve road stability.	The planned box culvert intervention is located close to an operational milling machine facility. Therefore, appropriate construction methods and careful planning will be required to avoid disrupting operations and minimize potential impacts on the nearby facility.
30 + 300 (Gaseka area)	The affected road section, approximately 80 meters in length, is experiencing subsidence and requires reconstruction, including improvement of road layers and installation of drainage structures and a box culvert. In this area a crash protection barrier covering 3.7 km will be installed to enhance road safety.	The area presents potential OHS hazard risks, as it is located within a settlement area where construction activities may increase exposure of workers and community to safety risks.
58 + 650 (Rwasama).	The road section is experiencing subsidence and requires rehabilitation through the installation of a box culvert.	Traffic and OHS hazard risks and impacts.
62 + 350	Approximately 70 meters of the road section has failed and requires reconstruction.	

67 + 850	The road section has deteriorated and requires reconstruction.	Traffic and OHS hazard risks and impacts.
72 + 400 (Maya area)	The area has been significantly degraded by water erosion over an approximate 300-meter stretch and requires pavement rehabilitation.	Traffic and OHS hazard risks and impacts.
77 + 000	The area requires construction of a major drainage system and installation of roadside safety barriers to improve road stability and enhance safety.	Traffic and OHS hazard risks and impacts.
Huye–Nyamagabe–Buhinga–Rusizi National Roads (123 km).		
	The targeted intervention is similar to those Kigali–Gatuna Road. The road also passed through Nyungwe National Park.	The anticipated safeguard risks are mainly related to Traffic and OHS hazard risks and impacts. RTDA should incorporate key road traffic aspects in the designs and where possible support some of the road related measures contained in the updated General Management Plan for Nyungwe National Park. Key road traffic measures include: closer supervision of construction works in the Park, tougher regulation of the speed on the roads crossing the Park, enhanced patrolling on the roads, additional signage and speed camera's be installed to limit the speed to 40 Km/h; installation of humps at specified intervals in the park, and a closer collaboration with transport companies and a sustained awareness among travelers would have a more positive impact.
Nyamkecuru Quarry Site	This is one of the closed quarry sites that has been rehabilitated, demonstrating the implementation of mitigation measures and proper quarry management practices.	The area has been restored and rehabilitated through planting of eucalyptus trees.

5.8. Aviation Travel and Logistics (ATL) Environmental and Social Safeguard Status

Aviation Travel and Logistics Holding Ltd (ATL) was established by the Government of Rwanda (GoR) in October 2015 as the holding company for Rwanda's aviation-related businesses and services. Its mandate is to strengthen Rwanda's position as a regional aviation hub through the development of an integrated aviation ecosystem. ATL oversees three operational subsidiaries—RwandAir, Rwanda Airports Company (RAC), and Akagera Aviation—and two non-operational entities, Rwanda Trade Exchange (RTE) and Rwanda Logistics Limited (RLL). Collectively, these entities support the aviation value chain through airport management, air transport services, aviation training, tourism, logistics, and cargo operations.

The ESSA found that while ATL provides strategic oversight, operational responsibility for airport infrastructure development, airport operations, air navigation services, airport commercial activities, and airport facilities management rests with the Rwanda Airports Company (RAC). Environmental, social, health, and safety (ESHS) functions are coordinated through RAC's Risk, Safety and Quality Department, which is responsible for environmental management, quality assurance, operational safety, and enterprise risk management. However, the department is currently operating below its approved staffing establishment, with only one of four planned positions filled, although recruitment of the remaining personnel is underway. RAC also plans to strengthen its environmental management system through certification under ISO 14001.

The assessment established that ATL currently does not have a standalone Environmental and Social Policy, Environmental and Social Management System (ESMS), safeguards manual, Stakeholder Engagement Plan (SEP), or Occupational Health and Safety Management System aligned with international standards. Environmental screening procedures, stakeholder engagement processes, and project-level environmental and social management arrangements are also not yet fully institutionalized at the corporate level. ATL indicated that these gaps will progressively be addressed through the implementation of ISO 14001 (Environmental Management Systems) and ISO 45001 (Occupational Health and Safety Management Systems).

Following the revision of the proposed AIIB-supported Program, RAC will no longer undertake aerodrome rehabilitation works under the RBP. The originally proposed rehabilitation of airport infrastructure was withdrawn due to budget limitations under the Results-Based Financing (RBF) framework and the need to avoid operational disruption at Kigali International Airport pending completion of the New Kigali International Airport. Consequently, the revised aviation component will focus on procurement of electric ground support equipment (e-GSE), acquisition of two aerodrome firefighting trucks to reinforce the existing Category 6 Rescue and Fire Fighting Service (RFFS), implementation of Airport Carbon Accreditation, Information Security Management System (ISMS), Airport Collaborative Decision Making (A-CDM), ISO 31000 enterprise risk management, and aviation workforce development. All proposed activities will be implemented

within existing airport facilities and will not require airport expansion, land acquisition, or physical or economic displacement.

With respect to experience in implementing development partner-funded projects, RAC (formerly part of the Rwanda Civil Aviation Authority) previously implemented the aviation component of the World Bank-financed Great Lakes Trade Facilitation Project, which included rehabilitation of Kamembe Airport. This experience strengthened RAC's familiarity with environmental and social requirements applicable to infrastructure development. However, ATL's institutional experience in applying multilateral development bank environmental and social frameworks at the holding company level remains limited and requires further strengthening.

The ESSA further found that environmental compliance is integrated into RAC's operational manuals and management procedures in accordance with national environmental, labour, and occupational health and safety legislation. Given the revised scope of activities, the anticipated environmental and social risks are considerably lower than those associated with civil works and are mainly related to equipment procurement, installation, operational safety, waste management, and workforce management. External statutory inspections prior to implementation are not anticipated because the retained activities involve equipment acquisition and operational improvements rather than infrastructure construction.

Regarding stakeholder engagement and grievance management, RAC does not currently operate a standalone project-level Grievance Redress Mechanism (GRM). For projects affecting communities, the organization relies on local government administrative structures to receive and address grievances. However, the revised RBP activities are largely confined to existing airport operational areas and are not expected to affect surrounding communities; consequently, community-related grievances are unlikely. Workplace grievances will continue to be managed through RAC's Human Resource Manual and existing administrative procedures. Similarly, provisions relating to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and workplace misconduct are contained within the Human Resource Manual, although project-specific SEA/SH management procedures have yet to be formalized.

Overall, the ESSA concludes that RAC possesses an established institutional framework for managing environmental, safety, quality, and operational risks. Nevertheless, strengthening of environmental and social management systems remains necessary, particularly through completion of E&S staffing, development of a formal ESMS, strengthening of stakeholder engagement and grievance management arrangements where applicable, integration of E&S requirements into procurement and contractor management, and implementation of ISO 14001 and ISO 45001 management systems to align with international good practice and the requirements of the Results-Based Program.

5.9. Exclusion Criteria

Based on the anticipated environmental, social, OHS, and security risks described in the ESSA, and applying the AIIB RBP exclusion principle (excluding activities with potentially significant, sensitive, diverse, or unprecedented adverse impacts), the ***Program shall exclude projects that are likely to involve:***

1. All activities not included in the AIIB Reviewed Annual Work Plan Confirming the Exclusion of Category 'A' activities
2. High risk activities as per Rwanda's Screening Systems; Ministerial Order No. 001/2019 of 15/04/2019; Ministerial Order No 003/MoE/25 OF 19/08/2025 Relating to Environmental and Social Impact Assessment; Biodiversity Law (Law governing Biological Diversity Law 64 of 2021), and the National Parks Law No 001/2023 of 13/01/2023.
3. Procurement of Electronic Equipment by ATL not in Conformity of Extended Producer Responsibility (EPR);
4. Road works that rely on construction materials sourced from quarries, borrow pits, dumping sites, or ancillary sites that lack approval or regulatory compliance from the Rwanda Mines, Petroleum and Gas Board (RMB).

Others Criteria are:

a) Significant conversion, degradation, or encroachment into critical natural habitats, protected areas, wetlands, forests, biodiversity hotspots, river systems, or cultural heritage sites, resulting in irreversible ecological damage or habitat loss. No activities on a larger scale than spot improvement works such as road expansion, construction of new road alignment inside the National Park shall be allowed under the Program.

> **Note**: Such activities shall be excluded in accordance with the Biodiversity Law (Law governing Biological Diversity Law 64 of 2021), the National Parks Law No 001/2023 of 13/01/2023 governing national parks and nature reserves, corresponding ministerial orders to formalize the management of national parks and buffer zones and AIIB Results Based Financing Guidelines.

b) Air, water, or soil contamination causing significant adverse impacts on the health, safety, or livelihoods of workers, communities, or ecosystems, including uncontrolled emissions, hazardous spills, pollution, or poor waste management.
c) Workplace conditions, construction activities, or operational environments that expose workers or nearby communities to significant health, safety, security, or life-threatening risks beyond manageable levels.

d) Activities requiring large-scale land acquisition, physical or economic displacement, forced eviction, or major restrictions on access to land, livelihoods, natural resources, or community services, where impacts cannot be adequately mitigated.
e) Large-scale land use changes, Greenfield transport infrastructure, road realignment outside existing corridors, or activities causing significant cumulative, induced, or indirect environmental and social impacts.
f) Activities likely to generate significant environmental or social impacts over large geographical areas, including transboundary impacts, major hydrological changes, severe erosion, flooding, landslides, GHG emissions, or increased climate and disaster **vulnerability.**
g) Activities involving forced labour, child labour, serious labour rights violations, unsafe labour practices, or non-compliance with labour, OHS, environmental, and worker welfare requirements**.**

6. Operational Performance and Institutional Capacity Assessment

This section summarizes Rwanda's Environmental and Social Systems and institutional capacity assessment based on the Seven AIIB Core E&S Principles, derived AIIB RBF Guidance Note in line with their Environmental and Social Policy (ESP) and Environmental and Social Framework (ESF).

6.1. Legal and Policy Position

Overall, Rwanda's existing legal and institutional framework provides a practical and structured basis for managing environmental, health, safety, and social risks likely to arise under the proposed RBP. The country has established regulatory authorities, laws, and guidelines to oversee construction-related risks and their impacts on the environment and local communities, supported by a multi-level institutional framework in which responsibilities for E&S social management are shared across national and local actors, promoting coordination, accountability, and effective oversight.

Consequently, the existing systems provide mechanisms to address anticipated risks under the RBP, including *environmental risks such as soil erosion, sedimentation, air and noise pollution, slope instability, landslides, water pollution, biodiversity disturbance, waste generation, and climate-related hazards; occupational health and safety risks such as machinery-related accidents, traffic incidents, falls, electrical hazards, exposure to dust, noise, vibration, hazardous materials, worker fatigue, and inadequate emergency response; and social risks including land acquisition, resettlement, community health and safety concerns, labour-related issues, Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and child protection concerns associated with labour influx and construction activities. Similarly, anticipated risks related to airport resurfacing works, including worker safety in active runway areas, temporary operational disruptions, and security vulnerabilities linked to restricted airport access, are expected to remain localized, site-specific, and manageable through effective mitigation measures, institutional coordination, and regulatory compliance.*

6.2. Available Environmental and Social Supporting Institutions

Rwanda's institutional framework provides strong mechanisms that enable the RBP implementing agencies to leverage existing national systems and services for the effective management of environmental, occupational health and safety (OHS), labour, and social risks. Key institutions play complementary roles in ensuring regulatory oversight, compliance enforcement, social protection, and grievance redress.

The Rwanda Environment Management Authority (REMA) and the Rwanda Development Board (RDB) are central to the review and approval of environmental studies, environmental compliance monitoring, and overall oversight of environmental risk management. In addition, Environmental Inspectors are legally mandated to monitor compliance, conduct inspections, and

investigate environmental violations, thereby strengthening enforcement of environmental regulations.

The Rwanda Labour Inspectorate (RLI) is responsible for enforcing labour laws and OHS standards. Labour inspectors are deployed at both national and district levels to monitor workplace compliance, undertake inspections, investigate occupational incidents, and enforce labour and safety requirements through administrative and corrective measures. The Inspectorate also works with district authorities and coordinates with the **Rwanda Social Security Board (RSSB),** which provides social protection services to construction workers, including occupational injury insurance and health insurance schemes, thereby improving labour welfare, workplace protection, and economic security.

Apart from the specified regulatory authorities, Rwanda has institutions with important regulatory mandates that are relevant to the implementation of the RBP, including the Ministry of Interior and the Rwanda Standards Board (RSB). The Ministry of Interior is responsible for regulating and authorizing the importation, storage, transportation, and use of explosives required for construction activities, including rock blasting, thereby ensuring compliance with national regulations and the safe management of explosives. The Rwanda Standards Board (RSB) is responsible for developing and enforcing national standards for construction materials, equipment, and works. Its involvement will support quality assurance, regulatory compliance, and the effective management of environmental, occupational health and safety, and social risks.

For social risks and grievance management, particularly **cases involving harassment, Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), child abuse, and other social-related grievances affecting workers or local communities**, Rwanda has established specialized institutional support and legal response mechanisms. The National Public Prosecution Authority (NPPA) is mandated to prosecute GBV, child abuse, and other social offences, ensuring accountability and access to justice. The Rwanda National Police (RNP) supports law enforcement through specialized GBV desks, protection of vulnerable groups, and investigation of social offences. Similarly, the National Commission for Human Rights (NCHR) plays an important role in promoting and safeguarding human rights, social justice, equality, and protection against abuse.

Collectively, these institutions form an integrated system of policy implementation, regulatory enforcement, service delivery, social protection, and inter-agency coordination, which significantly strengthens Rwanda's capacity to effectively manage environmental, labour, OHS, and social risks under the proposed Program.

E&S Capacity of Implementing Institutions: The ESSA found that RTDA has established a robust Environmental and Social (E&S) management system through its Compliance and Safeguards Unit, which comprises 25 staff and is responsible for overseeing risk management,

safeguards implementation, stakeholder engagement, grievance redress, and compliance monitoring across transport infrastructure projects. RDTA also operates a structured Grievance Redress Mechanism (GRM) to address issues related to land acquisition, compensation, resettlement, and construction impacts, while also handling sensitive cases such as GBV and SEA.

Further, RTDA has experience implementing donor funded infrastructure projects, which has enhanced its capacity in environmental and social safeguards, procurement, contract management, and compliance with international standards. Through projects financed by institutions such as the World Bank, AfDB, OPEC Fund, BADEA, and Korea Exim Bank, RTDA has strengthened its ability to manage environmental and social risks, land acquisition, stakeholder engagement, and mitigation measures.

Despite RTDA's established environmental and social safeguards capacity, the growing number of road infrastructure projects has increasingly stretched the capacity of the Safeguards Unit. This challenge is expected to intensify with the implementation of the additional AIIB-financed RBP, whose scope is nationwide. The ESSA identified key gaps across active road construction sites, particularly in occupational health and safety (OHS), including inadequate provision of personal protective equipment (PPE), poor segregation of construction works from road users, weak safety signage, and insufficient speed control measures. Furthermore, although RTDA has extensive experience in infrastructure delivery, it has not yet implemented road projects under an RBP financing arrangement. This underscores the need to strengthen institutional capacity, including recruitment of additional safeguards staff to effectively oversee and manage RBP-related activities.

The ESSA found that ATL's environmental and social (E&S) management capacity remains limited. While RAC has experience implementing development partner-funded airport projects and complies with national environmental requirements, ATL has not yet established a standalone Environmental and Social Policy, Environmental and Social Management System (ESMS), safeguards manual, Stakeholder Engagement Plan (SEP), or Occupational Health and Safety Management System aligned with international good practice. To address these gaps, ATL plans to implement ISO 14001 and ISO 45001 management systems and strengthen its institutional capacity through the recruitment of a dedicated Environmental and Social Safeguards Specialist. Following the revision of the AIIB-supported Program, aerodrome rehabilitation has been removed from the RBP. The aviation component will instead support procurement of electric ground support equipment (e-GSE), aerodrome firefighting trucks, Airport Carbon Accreditation, Information Security Management Systems (ISMS), Airport Collaborative Decision Making (A-CDM), ISO 31000 risk management, and workforce development, all within existing airport facilities and without requiring airport expansion or land acquisition.

Conclusion: Subsequently, this analysis assesses the capacity of the E&S systems applicable to the RBP in their current form, including national regulatory institutions (such as RDB, REMA, and **RLI)** as well as Program implementing agencies. The key findings are presented using the ***SWOT (Strengths, Weaknesses, Opportunities, and Threats)*** framework, adapted to the PforR context as follows:

- **Strengths** – Areas where the system operates effectively, efficiently, and in alignment with the adopted AIIB core principle.
- **Weaknesses** – Existing gaps, inconsistencies, and capacity limitations between the principles outlined in the AIIB Policy and Directives and the E&S systems of the country and implementing institutions.
- **Opportunities** – Priority actions required to strengthen the existing institutional systems and enhance management of environmental and social issues.
- **Threats (Risks)** – Potential risks and external factors that may negatively influence Program implementation and overall performance.

Based on the foregoing assessment, the key elements of the E&S Management Systems are summarized below:

Core Principle 1: Program E&S Management Systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making related to the Program's E&S effects

Summary of Findings: ***The Core Principle No. 1 is Applicable***. To a large extent, Rwanda has adequate national regulatory framework and established E&S procedures to effectively manage the potential impacts of the RBP. However, as the Program involves physical activities, it may generate adverse effects on both people and the environment.

The RBP implementing institutions shall be guided by the relevant national legal and regulatory framework, including Law No. 55/2011 of 14/12/2011 Governing Roads in Rwanda; Law No. 48/2018 of 13/08/2018 on Environment; the Environmental Impact Assessment Guidelines (2006); Ministerial Order No. 001/2019 of 15/04/2019 establishing the list of projects subject to Environmental Impact Assessment (EIA), including related instructions, requirements, and procedures. Law No. 001/2023 of 13/01/2023 Governing National Parks and Nature Reserves; Law No. 046/2024 of 04/06/2024 Governing Forests and Trees in Rwanda; Law No. 70/2013 of 02/09/2013 Governing Biodiversity in Rwanda; and Regulation No. 002 of 26/04/2018 Governing E-Waste Management in Rwanda.

System Strengths: Rwanda has an established framework for environmental and social assessment that is aligned with AIIB E&S Policy as well as international best practices.

Weaknesses/Gap: The assessment identified institutional capacity gaps within the ESIA Unit of the RDB, particularly in relation to human resources and technical oversight. The unit is understaffed, with only three staff members responsible for reviewing ESIA submissions, resulting in excessive workload pressure due to the high volume of reports received. This staffing limitation might affect the ability to conduct timely, thorough, and comprehensive reviews of ESIA reports and reduces the effectiveness of quality assurance processes. In addition, limited human and technical capacity constrains the institution's ability to undertake adequate site verification, and post approval compliance monitoring. The RDB has indicated that three additional staff members are expected to join the Unit soon, which is anticipated to strengthen its review and oversight capacity.

Opportunities and Actions: The RDB recognizes the importance of environmental sustainability and the need to strengthen the capacity of the ESIA Unit. The following required actions are required.

- RDB, to increasing staffing levels within the ESIA Unit to reduce workload pressures and improve the timeliness and quality of ESIA reviews.
- Targeted capacity-building programs and specialized training should be provided to strengthen technical expertise in reviewing complex infrastructure and high-risk projects.
- The institution should also allocate adequate resources for regular site verification, compliance monitoring, and post-approval follow-up inspections.
- Develop standardized ESIA review procedures, including clear guidelines, checklists, templates, and review criteria, to ensure consistent, transparent, and high-quality assessments, while strengthening inter-agency collaboration to enhance operational efficiency and environmental and social oversight.

Core Principle 2: Avoid, minimize or mitigate adverse impacts and promote informed decision-making relating to the RBP's environmental and social impacts.

Summary of Findings: Core Principle No. 2 is applicable to the RBP. To a large extent, Rwanda has an adequate national legal and regulatory framework, as well as established environmental and social (E&S) procedures, to effectively manage the potential impacts associated with the Program.

In addition to the laws stipulated under Core Principle No. 1, the RBP implementing institutions shall be guided by the relevant national legal and regulatory frameworks governing social matters in Rwanda. These include, among others: Labour Law No. 66/2018 of 30/08/2018; Law No. 71/2018 relating to the Protection of the Child; Law No. 59/2008 on the Prevention and Punishment of Gender-Based Violence; Law No. 27/2021 of 10/06/2021 Governing Land in Rwanda; Presidential Order No. 25/01 of 25/02/2015 modifying the General Traffic and Road

Traffic Regulations; and Law No. 20/2018 of 29/04/2018 establishing regulations governing Civil Aviation in Rwanda.

Overall, the findings, legal and regulatory frameworks, institutional arrangements, and environmental and social management measures identified under Core Principle No. 1 are equally applicable and relevant to Core Principle No. 2.

Core Principle 3: Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program.

Summary Findings: ***The Core Principle No. 3 is Applicable***. Although all project roads traverse existing developed road corridors some are located near environmentally sensitive ecosystems, including forests, wetlands, rivers, marshlands, biodiversity hotspots, and protected landscapes. Road rehabilitation and maintenance activities may result in temporary vegetation clearance, habitat disturbance, soil erosion, and increased human access to ecologically sensitive areas, potentially affecting biodiversity and ecosystem integrity. Inadequately managed works could also contribute to water pollution, soil erosion, wetland degradation, and encroachment into sensitive environmental zones. These risks highlight the need for careful planning, effective environmental management, and targeted mitigation measures, particularly in environmentally sensitive areas.

System Strengths: The Rwanda Transport Development Agency recognizes the importance of environmental sustainability and has established institutional capacity for environmental and social risk management, including the preparation and implementation of ESIAs and ESMPs. Specifically, RTDA will be guided by the relevant national legal and regulatory framework, including:

- The Environmental Impact Assessment Guidelines (2006).
- Law Nº 55/2011 of 14/12/2011 Governing Roads in Rwanda;
- Law Nº 70/2013 of 02/09/2013 Governing Biodiversity in Rwanda.
- Law Nº. 48/2018 of 13/08/2018 on Environment.
- Ministerial Order No. 001/2019 of 15/04/2019 Establishing the List of Projects Subject to EIA, Including Related Instructions, Requirements, and Procedures.
- Law N° 064/2021 of 14/10/2021 Law Governing Biological Diversity.
- Law No. 001/2023 of 13/01/2023 Governing National Parks and Nature Reserves;
- Law No. 046/2024 of 04/06/2024 Governing Forests and Trees in Rwanda; and
- Law N° 072/2024 of 26/06/2024 on Mining and Quarry Operations
- Ministerial Order No 003/Moe/25 of 19/08/2025 Relating to ESIA

Weaknesses/Gaps: Gaps were identified in this area.

The E&S Management System (ESMS) has implementation gaps which were identified during the review and interviews with RTDA, REMA, and RDB. Most notable are the staffing constraints compared to the volume and scope of work being undertaken by these institutions. RTDA will need to strengthen their supervision of ongoing works while RDB and REMA need to fill up the vacant positions to address the glaring human capacity gaps.

Opportunities and Actions: The law requires consultation and coordination with the Rwanda Development Board and other relevant stakeholders for any proposed intervention located near or within protected areas. This process helps ensure that appropriate mitigation measures are identified and implemented to address potential environmental and social impacts associated with the interventions.

- All investments likely to adversely affect forest reserves, national parks, ecologically sensitive rivers, wetlands, or other protected ecosystems will be excluded from the Program.
- The implementing institutions will allocate adequate financial resources to support the preparation, review, and implementation of the ESIA process.

Core Principle 4: Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

Summary Findings: The Core Principle No 4 is Applicable. The ESSA has found that targeted activities under **Components 1&2,** including road rehabilitation, maintenance, upgrading, and airport resurfacing will generate several occupational health and safety (OHS) risks, particularly during construction and transport related operations. Key risks include exposure to moving machinery and traffic related accidents, unsafe working conditions, falls from heights, electrical hazards, handling of hazardous materials, and exposure to dust, noise, and vibration. Workers may also face fatigue, physical strain, and inadequate emergency response arrangements arising from long working hours, repetitive tasks, insufficient rest periods, and limited preparedness to respond to workplace accidents and incidents.

The Rwanda Labour Inspectorate (RLI) is mandated to ensure that workplaces are safe and free from risks to the health and safety of workers, the public, and the environment. As such, no major inconsistencies were identified between the national system and Core Principle 3. However, the agency identified unsafe working conditions, inadequate safety management practices, poor use of PPE, falls from heights, exposure to hazardous substances, and limited emergency preparedness as key OSH challenges within Rwanda's construction industry. Further, there weak enforcement

and inconsistent application of OSH requirements across project sites, combined with limited awareness of safety standards among workers and contractors, as well as delays in reporting occupational accidents, incidents, and safety violations.

In addition, the ESSA identified several gaps across active road construction sites under the Rwanda Transport Development Agency, including inadequate provision of PPE, poor segregation of construction activities from road users, weak safety signage, and insufficient speed control measures.

These findings highlight the need to strengthen institutional and supervisory capacity, including the recruitment of additional environmental and social safeguards staff to effectively oversee and manage RBP-related activities. To effectively manage environmental, OHS, and social risks associated with road works, the RBP should integrate OHS and environmental requirements into procurement and contract documents, allocate adequate budget and qualified safeguards personnel, and strengthen monitoring and enforcement systems to ensure contractor compliance with national regulations. Coordination between the RTDA and Labour Inspectors should be enhanced to improve inspections, compliance monitoring, and accident investigations. The RBP should also promote a strong safety culture through regular training, awareness programs, and enforcement of Codes of Conduct, while establishing effective worker grievance mechanisms.

System Strengths: The RLI has a well-established institution with dedicated personnel who also support construction related activities. The agency operates through both centralized and decentralized structures, with the Ministry providing overall policy direction and supervision, while labour inspectors at national and district levels undertake workplace inspections, enforce labour and OHS requirements, and investigate workplace incidents in coordination with district authorities and other relevant institutions. *The Government has further strengthened the regulatory framework through the adoption of Ministerial Order N° 001/19.20 of 17/03/2020 relating to labour inspection and Ministerial Order No. 02/MIFOTRA/2023 on Occupational Safety and Health.*

System Weaknesses

- Weak enforcement and inconsistent application of OSH requirements across project sites, combined with limited awareness of safety standards among workers and contractors, as well as delays in reporting occupational accidents, incidents, and safety violations.
- Limited human and financial resources, including an inadequate number of labour inspectors, constrain effective nationwide inspection coverage and enforcement of labour and OSH requirements across the growing number of workplaces, contractors, and infrastructure projects.

Opportunities and Recommended Actions: Both RTDA and RLI recognize the specified weakness and they suggest RBP to proactively address these challenges by:

- Integrating OSH requirements into contracts, allocating adequate safety resources, recruiting qualified OSH personnel, conducting regular risk assessments and safety training, strengthening monitoring and reporting systems, ensuring contractor compliance with labour and OSH laws, and
- Promoting close collaboration between labour inspectors and Rwanda Transport Development Agency inspectors to enhance workplace safety oversight.

Core Principle 5: Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards

Summary Findings: **Core Principle 5 is applicable**. Activities under Component Two involving airport resurfacing will not require land acquisition, as all works will be confined within existing ATL land. However, Component One involving road works will not involve construction of new roads and will mainly be confined within existing road corridors. Nevertheless, rehabilitation, upgrading, and periodic maintenance activities requiring road widening, realignment, and drainage improvements to enhance road safety may result in physical and economic displacement of Project Affected Persons (PAPs). However, any such impacts are expected to be minimal, localized, and manageable through the application of appropriate mitigation and compensation measures.

Summary Findings: Core Principle 4 is applicable. Activities under Component Two, which involve airport resurfacing, will not require land acquisition because all works will be undertaken within the existing ATL boundaries. Similarly, Component One will not include the construction of new roads, as activities will mainly be carried out within existing road corridors. However, some rehabilitation, upgrading, and periodic maintenance works particularly those involving road widening, realignment, and drainage improvements to enhance road safety may lead to physical and economic displacement of Project Affected Persons (PAPs).

The ESSA has found that in undertaking land acquisition, institutions including RTDA face several challenges, such as delays in the approval of expropriation files at district and City of Kigali levels, which can affect timely compensation and project implementation. In addition, differences in land and property values between urban and rural areas, together with limited technical capacity at decentralized levels for valuation review and grievance management, may affect the efficiency, consistency, and timely implementation of land acquisition processes.

System Strengths: RTDA recognizes the importance of resolving all land acquisition and compensation matters prior to the commencement of construction works. Law No. 27/2021 of 10/06/2021 Governing Land in Rwanda provides legal framework for land administration, tenure, management, acquisition, registration, transfer, and use in Rwanda.

System Weaknesses: Delays in the approval of expropriation files at district and City of Kigali levels and limited technical capacity at decentralized levels for valuation review and grievance management.

Opportunities and Recommended Actions: To proactively address anticipated land acquisition issues, RTDA shall perform the following:

a) Ensure that all rehabilitation, upgrading, and maintenance activities likely to result in physical or economic displacement are screened early to identify land acquisition requirements and potential impacts on Project Affected Persons (PAPs).
b) Establish clear procedures for managing project scope changes, including road widening, drainage improvements, and junction modifications, to ensure that any additional land acquisition and PAP impacts are identified, assessed, and addressed promptly.
c) Allocate adequate contingency budgets for compensation and resettlement activities to address evolving compensation needs and variations in asset valuation during project implementation.
d) Prepare and implement site-specific Resettlement Action Plans (RAPs), Abbreviated RAPs, or other relevant resettlement instruments in accordance with applicable national legislation and program requirements prior to commencement of civil works.
e) Strengthen coordination between RTDA, district authorities and valuation institutions to expedite the review and approval of expropriation files and ensure timely compensation payments.
f) Strengthen stakeholder engagement and grievance management through continuous consultation, accessible grievance redress mechanisms, and regular monitoring of land acquisition and compensation processes.

Core Principle 6: Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, paying special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups.

Summary Findings: Core Principle 6 is **Not Applicable** as there are no groups defined as Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the Republic of Rwanda. The project will not disproportionately impact vulnerable groups.

Required Actions: None

Core Principle 7: Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

Summary Findings: Core Principle 7 is **Not Applicable** as the Program will not entail social conflict in fragile states, post-conflict areas or areas subject to territorial disputes, nor will it cause social conflict or impact distributional equity or associated cultural sensitivities. As such, the RBP ESSA did not consider the program in relation to Core Principle 6.

6.3. Integrated Risk Assessment

The ESSA established that the proposed interventions under the Rwanda Integrated Sustainable Transport Program (RBP), including periodic maintenance and improvement of existing feeder roads, paved and selected unpaved national roads, as well as runway resurfacing works, are expected to generate ***Generally Low to Moderate Environmental and Social Risks***. As all activities will be implemented within existing road corridors, airport boundaries, and operational areas, no Greenfield development is anticipated, thereby significantly reducing the likelihood of major environmental disturbances. Most impacts are expected to be ***localized, site-specific, and temporary in nature, and can be effectively managed through standard environmental and social mitigation measures.*** Nevertheless, Rwanda's mountainous terrain, high rainfall intensity, and the proximity of some project sites to environmentally sensitive areas may increase risks related to soil erosion, sedimentation, drainage disruption, pollution, traffic management, and occupational and community health and safety if not adequately managed.

In addition, certain road works, particularly those that migt involve oad widening, realignment, and drainage improvements aimed at enhancing road safety, may lead to limited physical and economic displacement of Project Affected Persons (PAPs). Given the nationwide scope of the RBP, land acquisition and resettlement issues will require careful planning and management to ensure timely compensation and effective mitigation of social impacts.

6.4. Program Action Plan

To address the identified environmental and social (E&S) risks, impacts, and system gaps, the RBP ESSA has recommended a set of appropriate mitigation and capacity strengthening measures to be implemented throughout PRB implementation. These measures form part of the **Program Action Plan (PAP**), which will guide actions to be undertaken prior to and during Program execution (Table 3).

NOTE: *The AIIB will conduct implementation support missions to assess how the RBP implementing institutions are implementing and monitoring the agreed measures to strengthen system performance for environmental and social management. The missions will review progress in implementing the agreed actions and verify compliance with the Program's environmental and social requirements.*

Where implementation gaps or non-compliance with the agreed measures or instruments are identified, adaptive management measures will be applied to address the deficiencies. In such cases, the respective Project Implementation Unit (PIU) will be required to sign a Corrective Action Form (CAF), which will also be endorsed by the Steering Committee and the implementing entity responsible for the relevant Program component (see Annex 8).

Environmental, Occupational Health and Safety (OHS), and Social Risks Mitigation Measures

To effectively manage environmental, occupational health and safety (OHS), and social risks, the RBP should implement the following measures:

i. **Environmental, Social, and OHS Risk Mitigation Measure**

- ***Submit the Annual Work Plan and Budget (AWPB)*** to AIIB for review and clearance to ensure exclusion of Category A and other ineligible high-risk activities.
- Prepare project briefs and site-specific ESMPs for each road subproject to identify and manage environmental, social, OHS, and security risks.
- ***Screen all subprojects to exclude Category A and other high-risk*** activities in accordance with Rwanda's screening system, EIA requirements, and AIIB RBP requirements.
- ***Strengthen Environmental, Social, and OHS Management Capacity.*** Integrate environmental, social, labour, occupational health and safety (OHS), and community health and safety requirements into procurement and contract documents; assign dedicated environmental and social personnel for the RBP within RTDA; and allocate adequate financial and human resources to support effective implementation, regular risk assessments, and safety training.
- ***Strengthen Compliance Monitoring and Inter-Agency Coordination.*** Establish robust monitoring and reporting systems for contractor compliance, including regular site inspections, incident reporting, corrective actions, and enhanced coordination between RTDA, Labour Inspectors, and other relevant regulatory agencies to improve supervision, enforcement, and accident investigations.
- ***Strengthen Environmental and Road Safety Management in Protected Areas*.** Enhance supervision of construction activities within and adjacent to protected areas through multi-agency oversight, implementation of contractor environmental management measures, strengthened traffic management, enforcement of speed limits, installation of appropriate road safety infrastructure (including signage, speed cameras, and traffic calming measures), and collaboration with transport operators and park authorities to protect biodiversity and improve visitor and wildlife safety.

ii. **Environmental, Social, and OHS Risk Mitigation Measure Cont'd**

- ***Strengthen environmental protection measures in protected areas*** through enhanced supervision, speed control, signage, enforcement, and public awareness.

- ***Strengthen land acquisition planning by undertaking early screening of subprojects to identify potential land acquisition and resettlement impacts,*** promptly assessing any additional requirements arising from project design changes, and ensuring adequate budget allocations, including contingency funds, for timely compensation and implementation of resettlement measures.

- ***Ministry of Infrastructure to devise fair and inclusive distribution of Program benefits related to capacity building and training across transport sector institutions***

iii. Mitigation Measures to Address Risks Associated with Airport Upgrading: To effectively manage electronic waste Procurement of Electronic Equipment by ATL the following measures are recommended:

- ***Integrate Extended Producer Responsibility (EPR) into Procurement.*** ATL should revise its procurement procedures and technical specifications to require suppliers and manufacturers, where feasible, to implement Extended Producer Responsibility (EPR) arrangements, including the take-back, refurbishment, recycling, or environmentally sound disposal of electronic equipment and batteries at the end of their service life.

- ***Develop and Implement an E-Waste Management Procedure***. ATL should establish and operationalize an e-waste management procedure that provides guidance on the inventory, segregation, temporary storage, handling, transportation, and disposal of obsolete electronic equipment in accordance with Rwanda's e-waste management regulations and international good practice.

- ***Strengthen Partnerships with Licensed E-Waste Recyclers***. ATL should establish agreements with licensed and authorized e-waste collection and recycling facilities to ensure that end-of-life electronic equipment, batteries, and electrical components are safely collected, recycled, recovered, or disposed of in an environmentally sound manner.

- ***Promote Sustainable Procurement and Capacity Building***. ATL should adopt sustainable procurement practices by prioritizing electronic equipment with longer service life, high energy efficiency, modular design, availability of spare parts, and manufacturer-supported maintenance. In parallel, ATL should provide training to procurement, technical, and facilities management staff on e-waste management, lifecycle management of electronic equipment, and implementation of Extended Producer Responsibility (EPR) requirements.

Table 3: Measures to Strengthen System Performance for Environmental and Social Management

Identified Gap (s)	Target Objective	Measures to be taken/Action Item	Progress Indicator	Timeframe	Responsible	Instrument
The RBP has a nationwide scope, which may result in the inclusion of activities that are ineligible under the Program	Ensure effective exclusion of ineligible sub-investments under RBP	Screen all ineligible road and airport investments by applying agreed screening criteria. RBP implementing agencies to submit their Annual Work Plans and Budgets (AWPBs) to AIIB for review and clearance to ensure that no Category 'A' activities are included under the RBP.	Annual work plan submitted to AIIB and reviewed, confirming that no Category A project activities are included under the RBP.	Throughout implementation	PIU, which is the Transport Directorate of MINIFRA, RTDA, Ministry of Infrastructure & ATL	PAP action in the legal agreement. AIIB review and clearance of the annual work plan, confirming that no Category A project activities are included under the RBP. Included in the verification of DLI 1, DLR 2 & DLR3 by the IVA
		Prepare and implement full ESIAs for road rehabilitation, natural resource extraction, and other activities requiring a full ESIA in accordance with Ministerial Order No. 003/MoE/25 of 19/08/2025. Prepare a Project Brief and site-specific Environmental and Social Management Plan (ESMP) for each road subproject that does not require a full ESIA to identify and manage	• Number of full ESIA and Project Briefs prepared and approved. • Number of site-specific ESMPs prepared and disclosed.	Throughout the Project.	RTDA	Approved ESIA and ESMP by RDB.

Identified Gap (s)	Target Objective	Measures to be taken/Action Item	Progress Indicator	Timeframe	Responsible	Instrument
		environmental, occupational health and safety (OHS), social, and security risks.	• Number of ESMP implementation monitoring reports submitted.			
Limited human resource capacity among the main RBP implementing agencies and regulatory authorities may compromise the effective implementation, oversight, and monitoring of ongoing road projects.	Ensure effective implementation of the Rwanda environmental and social management system for the RBP	Assign dedicated E&S Safeguard Specialists and allocate adequate financial and human resources to ensure effective implementation of E&S measures, including compliance monitoring, regular risk assessments, and staff training.	• E&S Dedicated • Adequate budget allocated annually for environmental and social	Throughout the Project.	RTDA & ATL	• Staff appointment letters; • Annual Work Plans and Budgets (AWPBs).
		Integrate environmental, labour, and OHS requirements into procurement and contract documents to ensure contractor compliance.	• Standard E&S clauses incorporated into bidding documents and contracts. • Number of procurement packages containing E&S and OHS	Throughout implementation	RTDA	Contractors' contracts with E&S Clauses.

Identified Gap (s)	Target Objective	Measures to be taken/Action Item	Progress Indicator	Timeframe	Responsible	Instrument
			requirements.			
Limited institutional capacity on E&S on ATL may constrain the effective management of electronic waste generated under the RBP.	Ensure effective management of Electronic Waste.	***Integrate Extended Producer Responsibility (EPR) into Procurement***	Procurement of electronic devises to include clauses on EPR	Throughout the project cycle.	ATL	Procurement contracts with EPR clause
The absence of dedicated E&S and GRM functions within the Ministry of Infrastructure may weaken safeguard oversight and increase the risk of exclusion and discrimination in access to	Strengthen mechanisms to ensure equitable access to RBP supported capacity-building and training opportunities across the transport sector."	Ministry of Infrastructure to devise fair and inclusive distribution of Program benefits related to capacity building and training across transport sector institutions.	Capacity-building and training allocation guidelines developed and adopted.	Within 6 months of RBP effectiveness	MININFRA	• Training Participant Selection Guidelines • Annual Training Reports • Training Attendance Records. • Periodic review of status of

Identified Gap (s)	Target Objective	Measures to be taken/Action Item	Progress Indicator	Timeframe	Responsible	Instrument
training and other RBP opportunities.						Grievance Management
	Develop and operationalize a project GRM	• GRM developed and operationalized.	Within three months after project effectiveness.	Ministry of Infrastructure	Project specific GRM in place.	Develop and operationalize a project GRM

*

7. Stakeholders Consultations

Introduction: The Government of Rwanda, in collaboration with the Asian Infrastructure Investment Bank (AIIB), convened the Validation Workshop on the Environmental and Social Systems Assessment (ESSA) for the Road Infrastructure for Socio-Economic Transformation Project – Results-Based Program (RISTP-RBP) on 8 July 2026 at the MINICOFIN Smart Board Room, Kigali, Rwanda. The workshop brought together representatives from AIIB, MINICOFIN, MININFRA, Rwanda Transport Development Agency (RTDA), Aviation Travel and Logistics Holding Ltd (ATL), Rwanda Development Board (RDB), Gender Monitoring Office (GMO), RAPEP, the World Bank Group, and other key government institutions responsible for planning, implementation, regulation, and oversight of transport infrastructure development.

The workshop provided an opportunity to present the ESSA findings and recommendations, obtain stakeholder feedback, validate the proposed actions, and strengthen institutional coordination for effective environmental and social (E&S) management during program implementation.

Objectives of the Workshop: To comply with the ESSA preparation process, AIIB guidance, and international good practice, a multi-stakeholder validation workshop was convened in Kigali, Rwanda, to present and validate the findings of the Environmental and Social Systems Assessment (ESSA). The workshop brought together approximately 25 representatives from relevant ministries and government agencies, implementing institutions, development partners, regulatory authorities, private sector organizations, ESIA professional bodies, civil society organizations (CSOs), organizations representing vulnerable and marginalized groups and persons with disabilities, academia, and other key stakeholders (Annex 3).

The workshop aimed to present the key findings and recommendations of the ESSA, solicit stakeholder comments and technical inputs, and validate the proposed recommendations and the Program Action Plan (PAP). It also provided participants with an overview of the scope, objectives, and expected results of the Road Infrastructure for Socio-Economic Transformation Project – Results-Based Program (RISTP-RBP), while strengthening coordination and collaboration among institutions responsible for environmental and social management. The workshop findings complemented the results of the field consultations and assessments undertaken during the ESSA process and provided an opportunity for stakeholders to identify measures for avoiding or minimizing potential environmental and social impacts associated with program implementation. Stakeholder inputs and recommendations were subsequently incorporated into the final ESSA report and the Program Action Plan (PAP), as appropriate.

Workshop Proceedings: The workshop commenced with opening remarks emphasizing the importance of strengthening Rwanda's environmental and social management systems to support sustainable infrastructure development. Participants introduced themselves and highlighted their institutional roles in project implementation and regulatory oversight. The ESSA findings were presented, followed by discussions on institutional capacity, environmental and social risks, implementation arrangements, and the proposed Program Action Plan. In addition, the Consultant presented the RISTP-RBP, outlining its three program components covering road infrastructure, airport modernization, and institutional capacity building.

Key Issues Discussed

Institutional Capacity for Environmental and Social Management: Participants observed that several implementing institutions continue to experience shortages of qualified environmental and social specialists despite increasing project portfolios. Stakeholders emphasized that adequate staffing is essential for effective implementation of national environmental legislation and compliance with AIIB Environmental and Social Policy requirements.

RTDA acknowledged that its current E&S team is overstretched and recommended establishing a dedicated team comprising Environmental, Social, Gender, and Environmental & Social Safeguards Officers to support AIIB-financed projects. Participants further agreed that government institutions should assess current staffing gaps and explore sustainable mechanisms for strengthening institutional capacity through recruitment and continuous professional development.

Environmental Management in the Nyungwe Landscape: The workshop discussed the ecological sensitivity of the Nyungwe landscape, noting that it contains critical habitats and endangered species, including species listed on the IUCN Red List. Participants emphasized that projects located within or near environmentally sensitive areas should undergo rigorous environmental and social assessments, biodiversity screening, and comply fully with national environmental regulations and AIIB requirements.

Rwanda Development Board (RDB) was recognized as the responsible authority for reviewing Environmental and Social Impact Assessment (ESIA) reports and issuing the required environmental approvals.

Validation of ESSA Findings: Participants reviewed the findings, recommendations, and proposed Program Action Plan contained in the ESSA. Overall, stakeholders agreed that the assessment accurately reflects the strengths and gaps within Rwanda's environmental and social management systems. The workshop validated the overall findings and agreed that stakeholder comments would be incorporated into the final ESSA where appropriate.

Additional Stakeholders: Participants recommended including the Ministry of Interior and the Rwanda Standards Board (RSB) as key stakeholders in program implementation.

The Ministry of Interior will play an important role in regulating and authorizing the importation and use of explosives for construction activities such as rock blasting, while RSB will ensure compliance with applicable technical standards, construction materials, equipment specifications, and safety requirements.

Contractor Code of Conduct: Stakeholders recommended that all contracts include a mandatory Contractor Code of Conduct addressing:

- Gender-Based Violence (GBV);
- Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH);
- Child protection;
- Non-discrimination;

- Workplace ethics; and
- Occupational Health and Safety (OHS).

All workers should sign and comply with the Code of Conduct as a condition of employment.

Presentation of the RISTP-RBP: The Consultant presented the Road Infrastructure for Socio-Economic Transformation Project – Results-Based Program (RISTP-RBP) covering the period 2026–2029. The program consists of three components:

- Road Infrastructure (70%), implemented by RTDA;
- Airport Infrastructure and Modernization (25%), implemented by ATL and Rwanda Airports Company (RAC); and
- Institutional Capacity Building (5%), implemented by MININFRA.

Expected program outcomes include improved transport connectivity, enhanced road and aviation safety, increased climate resilience, strengthened institutional capacity, and sustainable transport sector development.

Stakeholder Comments: Participants provided several recommendations for strengthening implementation of the program, including:

- Dedicate/Recruit additional environmental and social specialists within RDB, RTDA, and the Rwanda Labour Inspectorate.
- Develop institutional capacity-building plans for E&S staff across implementing agencies.
- Integrate Occupational Health and Safety requirements into procurement and contract documents.
- Conduct early screening to identify land acquisition requirements and prepare Resettlement Action Plans where necessary.
- Strengthen Ministry-level (Ministry of Infrastructure) grievance redress mechanisms.
- Ensure all project workers sign the Contractor Code of Conduct and establish GBV referral pathways.
- Improve the quality of social impact assessment within ESIA studies through additional technical expertise.
- Conduct a comprehensive environmental and social capacity needs assessment across participating institutions.
- The GMO noted that while the ESSA provides an adequate framework for managing environmental and social risks, particularly those related to gender-based violence (GBV) and sexual exploitation, abuse and sexual harassment (SEA/SH), it does not sufficiently promote gender inclusion, women's empowerment, or institutional accountability. To address these gaps, GMO recommended revising the Program Action Plan (PAP) to formally integrate GMO into program implementation and oversight, strengthen gender and SEA/SH capacity across all implementing agencies, incorporate measurable indicators on gender equality and women's participation, and establish a funded institutional mechanism for monitoring, auditing, and reporting on gender and social inclusion outcomes (See Annex 7 for more details). In responding to this feedback, GMO was informed that RBP Results Monitoring Framework (RMF) includes gender-specific

indicators to monitor gender equality and women's participation in program implementation.

Key Agreements: The workshop reached consensus on the following:

- The ESSA findings and recommendations were validated.
- Stakeholder comments will be incorporated into the final ESSA report where appropriate.
- Implementing agencies will strengthen institutional environmental and social capacity.
- Projects located within environmentally sensitive areas will undergo appropriate environmental and social assessment and biodiversity screening.
- Additional stakeholders, including the Ministry of Interior and RSB, will be incorporated into project implementation arrangements.
- Contractor Codes of Conduct will be mandatory across all program activities.
- Capacity-building activities will be undertaken based on institutional needs assessments.

Conclusion

The validation workshop successfully achieved its objectives by providing a platform for reviewing and validating the Environmental and Social Systems Assessment for the RISTP-RBP. Stakeholders expressed broad support for the ESSA findings and recommendations and reaffirmed their commitment to strengthening Rwanda's environmental and social management systems.

The workshop concluded that successful implementation of the RISTP-RBP will require continued collaboration among implementing agencies, regulators, development partners, and oversight institutions. Strengthening institutional capacity, enhancing environmental and social risk management, and implementing the agreed Program Action Plan will be critical for ensuring sustainable, inclusive, and resilient transport infrastructure development in Rwanda.

The meeting concluded at the MINICOFIN Smart Board Room on **8 July 2026 at 4:40 PM**, with appreciation extended to all participants for their valuable contributions and continued commitment to environmental and social sustainability.

This version is suitable for inclusion as an annex or standalone validation report accompanying the final ESSA. It follows the style commonly used in AIIB and World Bank consultation and validation reports.

8. ANNEXES

Annex 1: Data Collection Tools

ASIAN INFRASTRUCTURE INVESTMENT BANK

P001064-RISTP
March 23, 2026

Results Based Program

Rwanda Integrated Sustainable Transport Program

ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

RBP - Integrated Sustainable Transport Program, Environmental and Social System Assessment

Introduction

The Government of Rwanda considers the transport sector a key driver of economic transformation, export competitiveness, climate resilience, and inclusive growth. Efficient transport infrastructure supports sectors such as agriculture, manufacturing, and tourism by reducing logistics costs, improving market access, strengthening connectivity, and increasing resilience to external shocks.

To support these objectives, the Government of Rwanda, in collaboration with the **Asian Infrastructure Investment Bank**, is preparing the **Rwanda Integrated Sustainable Transport Program** using a Results Based Program (RBP) approach. The program focuses on three results areas: improving national and feeder roads, enhancing airport safety and efficiency and building institutional capacity across the transport sector.

Under the RBP financing modality, disbursements are linked to the achievement of agreed results and rely on Rwanda's national systems to manage environmental, social, fiduciary, and procurement aspects rather than directly applying the AIIB Environmental and Social Framework.

As part of program preparation, the AIIB conducts an Environmental and Social Systems Assessment (ESSA) to evaluate the adequacy and capacity of Rwanda's legal and institutional systems for managing environmental and social issues during program preparation and

implementation. This is important because the Program preparation and implementation will follow the country's legal, policy and institutional framework and not the AIIB's ESF.

We would therefore like to request your esteemed office to provide answers to the following questions as part of the Environmental and Social Systems Assessment.

***Each ESSA protocol/tool will include this introductory note.**

Annex 1.1 Questions to the Rwanda Environment Management Authority (REMA)

Institutional Mandate and Structure

1. What is REMA's mandate in environmental and social protection and management in Rwanda?
2. How is REMA institutionally structured at the national and subnational levels (province, district, and community)?
3. What are REMA's main roles in environmental and social regulation, monitoring, and enforcement?
4. Does REMA provide oversight and technical support to government institutions to ensure compliance with environmental and social laws? If yes, how is this support delivered?
5. Is REMA represented in all districts in Rwanda? If not, how is environmental compliance ensured at district and local levels?

Legal and Regulatory Framework

6. What policies, laws, regulations, and guidelines guide environmental and social management in Rwanda?
7. In your view, how adequate and effective are these legal and regulatory frameworks in managing environmental and social risks?
8. Are there any legal or regulatory gaps that need to be addressed?

Environmental and Social Risk Management

9. What role does REMA play in ensuring that government projects and programs comply with environmental and social laws during project preparation and implementation?
10. Based on your experience, what aspects of Rwanda's environmental and social risk management system are working well?
11. What environmental or social issues still require stronger attention or improvement?

Program Specific Risks and Mitigation

12. From your perspective, what environmental and social risks may arise during implementation of the Rwanda Integrated Sustainable Transport Program?
13. What mitigation measures would you recommend addressing these potential risks?
14. What form of technical guidance or support can REMA provide to the implementing institutions to ensure compliance with environmental requirements?
15. Has REMA provided such support in the past? If yes, what were the outcomes and key lessons learned from that experience?

Institutional Capacity

16. How would you assess REMA's institutional capacity to manage environmental and social protection and compliance (staffing, technical expertise, equipment, and financial resources)?
17. Does REMA have dedicated Social Development Specialists to assess and monitor social risks and safeguard measures?
18. Considering the number of government projects implemented in Rwanda, does REMA have sufficient capacity to ensure compliance?

Challenges and Improvement Measures

19. What key challenges does REMA face in ensuring that Program implementing institutions comply with environmental and social laws and regulations?
20. What measures could be introduced under the program to address these challenges proactively?
21. What institutional or operational improvements would strengthen environmental and social risk management in Rwanda?

Annex 1.2: Questions to the Rwanda Transport Development Agency (RTDA)

1. What are the core functions and institutional mandate of the Rwanda Transport Development Agency (RTDA)?
2. How does RTDA manage the project preparation from budget request, budget allocation, assign the PIC , tender, contract, construction and post construction. Do they have annual work plan to be submitted to MININFRA for approval?
3. What specific activities does RTDA expect to implement under the proposed Rwanda Integrated Sustainable Transport Program?
4. What potential environmental and social risks are associated with the activities mentioned in Question 2? Please identify the risks and propose appropriate mitigation measures for each.
5. What challenges might RTDA face in managing the environmental and social issues associated with the program activities?
6. Does RTDA screen all planned activities to determine whether they may require involuntary taking of land, relocation of residences or businesses, or restrictions on access to natural resources?
7. Please describe RTDA's past experience in implementing projects funded by the Asian Infrastructure Investment Bank (AIIB) or other Multilateral Development Banks (MDBs), such as the World Bank or the African Development Bank.
   Kindly include the project name, objectives, key activities, outcomes, and any other relevant experience.
8. What key lessons have been learned from these projects, particularly regarding environmental and social management?
   What could have been done differently to improve outcomes?
9. Has RTDA recently implemented any civil works (e.g., road construction, upgrading, or rehabilitation)?
   If yes, please provide details including the project location, scope/size, and estimated budget.
10. Were statutory inspections conducted by regulatory authorities to assess RTDA's compliance with Environmental, Health, and Safety (EHS) requirements for the civil works mentioned above?
11. Were statutory inspections conducted by regulatory authorities (e.g., Rwanda Labour Inspectorate or Rwanda Social Security Board) to assess RTDA's compliance with Environmental, Health, and Safety (EHS) requirements for the civil works mentioned above?
12. How has RTDA managed labour-related issues in previous civil works projects?
13. Under this program, are there plans to construct roads outside existing road corridors?
    If yes, please specify the number and location of such roads and indicate the land requirements, including potential resettlement implications.

14. Does RTDA have a department or unit responsible for environmental and social (E&S) management?
15. If yes, how many staff members are in this department/unit, and what are their qualifications, roles, and responsibilities?
16. If no dedicated environmental and social unit exists, what plans does RTDA have to ensure adequate staffing and resources to meet E&S requirements?
17. Does RTDA have feedback and complaints handling mechanisms, such as a Grievance Redress Mechanism (GRM)?
18. What are the most common grievances or complaints encountered during project implementation, and how are they addressed?
19. If no GRM currently exists, how does RTDA plan to manage grievances related to the Rwanda Integrated Sustainable Transport Program during implementation?
20. Does the GRM include procedures for handling cases related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and child protection?

Annex 1.3: Questions to the Rwanda Aviation, Travel and Logistics Holding (ATL) and the Rwanda Airports Company (RAC)

1. What are the core functions and institutional mandate of the **ATL/RAC?**
2. What specific activities does ATL/RAC plan to undertake under the rehabilitation of existing aerodromes? Will these activities be confined within the existing airport boundaries, or will they require expansion beyond the current airport land? If expansion is anticipated, please specify:

    - The number and location of the aerodromes involved.
    - The estimated additional land requirements; and
    - Whether the activities may involve land acquisition, physical displacement, or economic displacement (resettlement impacts).

3. **What specific activities are planned under the deployment of Electric Ground Support Equipment in Kigali International airport and Bugesera?**
   Will the deployment involve any of the following activities? Please specify.

Activity	**Yes**	**NO**
Procurement and use of electric baggage tractors.		
Electric aircraft towing vehicles (pushback tractors).		
Electric belt loaders and cargo loaders for luggage and freight handling.		
Electric passenger buses for transporting passengers between terminal and aircraft.		
Electric ground power units that supply power to aircraft when engines are off.		
Charging infrastructure installation for electric equipment.		

4. **What specific activities are planned under operational efficiency improvements and safety and security enhancements?** Will these activities include any of the following?

Activity	**Yes**	**NO**
Modernizing air traffic management and communication systems.		
Improving airport logistics and ground operations coordination.		
Introducing digital systems for monitoring airport operations and safety.		
Training staff on safe and efficient operation of new equipment and systems		
Modernizing air traffic management and communication systems.		
Improving airport logistics and ground operations coordination.		
Introducing digital systems for monitoring airport operations and safety.		
Training staff on safe and efficient operation of new equipment and systems		

Upgrading airport security screening equipment.		
Installing surveillance systems (CCTV) and improved lighting.		
Strengthening emergency response and firefighting infrastructure.		
Improving occupational health and safety measures for airport workers.		

5. **What specific interventions are planned to upgrade the firefighting category of Kamembe Aerodrome from Category 6 to Category 7 in line with International Civil Aviation Organization standards?**

In particular:

- What measures are planned to upgrade and equip the aerodrome firefighting station?
- Are there plans to procure additional or higher capacity Rescue and Firefighting (RFF) vehicles? If yes, how many and with what specifications?
- What infrastructure improvements are anticipated to enhance firefighting capacity?
    - Is there a plan to expand the existing fire station facilities (e.g., to accommodate additional vehicles, equipment, and personnel)?
    - Are improvements to access roads being considered to ensure compliance with required emergency response times?
    - Are there plans to upgrade water supply systems, including storage and hydrant networks, to meet Category 7 requirements?
    - If yes, will these activities be confined within the existing airport boundaries, or will they require expansion beyond the current airport land? If expansion is anticipated, please specify:

6. What potential environmental and social risks are associated with the activities mentioned in Question 3&4? Please identify the risks and propose appropriate mitigation measures for each.
7. What challenges might **ATL/RAC** face in managing the environmental and social issues associated with the program activities?
8. Please describe **ATL /RAC** past experience in implementing projects funded by the Asian Infrastructure Investment Bank (AIIB) or other Multilateral Development Banks (MDBs), such as the World Bank or the African Development Bank.
   Kindly include the project name, objectives, key activities, outcomes, and any other relevant experience.
9. What key lessons have been learned from these projects, particularly regarding environmental and social management?
   What could have been done differently to improve outcomes?
10. Has ATL/RCA recently undertaken any activities related to:

- Rehabilitation of existing aerodromes
- Deployment of electric ground support equipment (e-GSE)
- Operational efficiency improvements
- Safety and security enhancements
- Upgraded upgrade the firefighting station

If yes, please provide details on the activities, their locations, and the scope of implementation.

11. Were statutory inspections conducted by regulatory authorities (e.g., REMA, Rwanda Labour Inspectorate or Rwanda Social Security Board) to assess RTDA's compliance with Environmental, Health, and Safety (EHS) requirements for the civil works mentioned above?
12. How has **ATL/RAC** managed labour-related issues in previous civil works projects?
13. Does **ATL/RAC** have a department or unit responsible for environmental and social (E&S) management?
14. If yes, how many staff members are in this department/unit, and what are their qualifications, roles, and responsibilities?
15. If no dedicated environmental and social unit exists, what plans does your institution have to ensure adequate staffing and resources to meet E&S requirements?
16. Does **ATL/RAC** have feedback and complaints handling mechanisms, such as a Grievance Redress Mechanism (GRM)?
17. What are the most common grievances or complaints encountered during project implementation, and how are they addressed?
18. If no GRM currently exists, how does **ATL/RAC** plan to manage grievances related to the Rwanda Integrated Sustainable Transport Program during implementation?
19. Does the GRM include procedures for handling cases related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and child protection?

Annex 1.4: Questions to the Rwanda Labour Inspectorate

1. What is the core function of your institution (institutional mandate)?
2. What is the organizational structure for implementing your mandate?
3. What are your roles in ensuring that the projects/programs implemented by the government comply with the country's laws and regulations on Occupation Safety and Health (OHS)?
4. Which aspects do you think have been positive in OSH enforcement in Rwanda?
5. Which issues do you think still need further consideration?
6. What are the major OSH issues in Rwanda? (Focus on the construction industry).
7. What policies, laws and guidelines are in place to guide the handling of OSH issues? How would you describe the adequacy of these laws and regulations? Are there gaps that you consider worth filling?
8. What OSH issues do you think may arise during the implementation **Rwanda Integrated Sustainable Transport Program?** Please, suggest solutions.
9. How have you supported implementation of Ministry of Infrastructure (MININFRA) regarding OSH?
10. How equipped is your institution to manage workers' health surveillance, workers insurance and legal procedures in case the OSH issues have taken the court approach etc.
11. What challenges might your institution face in ensuring that the **Rwanda Integrated Sustainable Transport Program** implementing institutions meet the country' OSH laws and regulations?
12. How can the Project pro-actively address those challenges?
13. What kind of support can your institution extend to the project implementing institutions to help them meet the OSH laws and regulations?
14. Is your institution responsible for providing oversight and technical assistance to the project implementers to enable them to meet country's laws on OSH?
15. Is the Rwanda Labour Inspectorate represented in all districts in Rwanda? If not, how do you ensure that the project activities at district and local levels are in line with country's OSH laws and regulations?
16. How would you describe the capacity of the **Rwanda Labour Inspectorate** in ensuring OSH matters in Rwanda? In explaining this, consideration has to be made on the availability of qualified staff/human resources at the headquarters and local level, as well as equipment and financial resources necessary for monitoring and enforcement.
17. What are the major challenges that commonly constrain your institution in fulfilling its mandate?

Annex 1.5: Questions to the Ministry of Infrastructure (MININFRA)

1. What is the core function of the Ministry of Infrastructure (MININFRA)?
2. Given that one objective of the proposed Rwanda Integrated Sustainable Transport Program is to strengthen institutional support and capacity across the transport sector, what specific activities does MININFRA plan to implement under the program to attain this objective?
3. How will the targeted capacity-building activities under the Rwanda Integrated Sustainable Transport Program be delivered?

    - What areas or fields will the training focus on?
    - How many people are expected to benefit from the training?
    - How will beneficiaries be recruited?

4. What potential environmental and social risks or impacts may arise following implementation of specified activities? For each identified risk or impact, please propose the corresponding mitigation or management measures that could be applied to address them.
5. What challenges might your institution face in addressing the environmental and social issues you have mentioned in 6 above?
6. Please describe MININFRA past experience in implementing projects funded by the Asian Infrastructure Investment Bank (AIIB) or other Multilateral Development Banks (MDBs), such as the World Bank or the African Development Bank.

    - Kindly include the project name, objectives, key activities, outcomes, and any other relevant experience.
    - What key lessons have been learned from these projects, particularly regarding environmental and social management?
    - What could have been done differently to improve outcomes?

7. Has MININFRA recently implemented institutional support and capacity across the transport sector?

    - What key lessons have been learned from these projects, particularly regarding environmental and social management?
    - What could have been done differently to improve outcomes?

8. Does your ministry have a department or unit or personnel that deals with environmental and social issues?

9. If yes, how many individuals does the department's staff comprise? What are their qualifications, roles, and responsibilities?

10. If your institution has no environmental and social personnel, what is its plan for the staff and resources needed to meet the E&S requirements?

11. Does your institution have feedback and complaints handling mechanisms also known as Grievance Redress Mechanisms (GRM)?

12. What are major common complaints/ grievances that the ministry experience during project implementation? Explain how you address them.

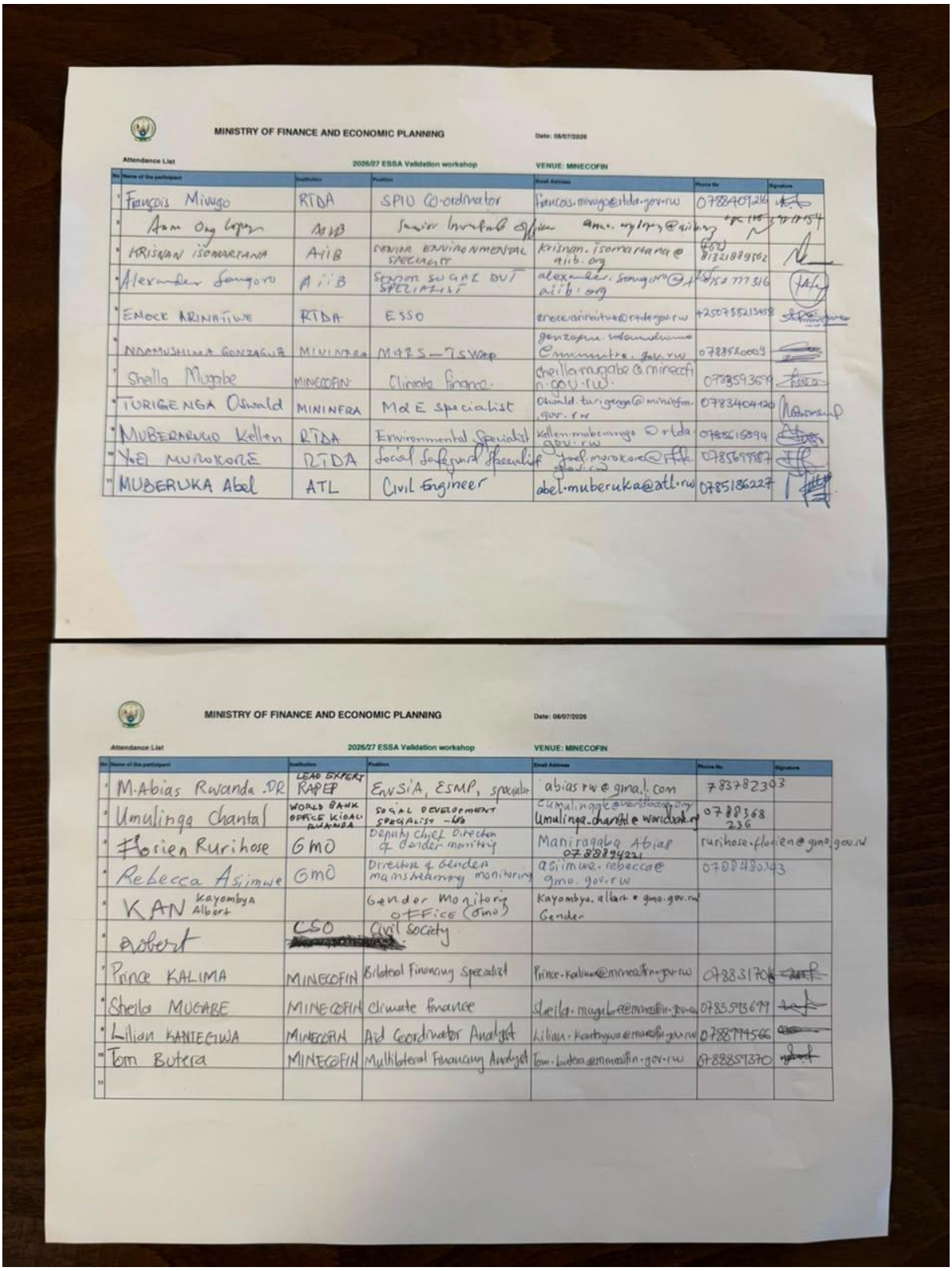
13. If you have no feedback and complaints handling mechanism (GRM) in place, how is the institution prepared to handle program-related grievances likely to emerge in the course of the implementation of the **Rwanda Integrated Sustainable Transport Program**
14. Does GRM include management of Gender Based Violence and Sexual Exploitation and Abuse (GBV and SEA related cases and child abuse related cases

Annex 2: RTDA Safeguard Staff, Their Qualifications, Roles, and Responsibilities

Position	*Minimum qualification*	*Key responsibilities*	*Reporting line*	*Number*
Compliance & Safeguards Program Manager	Master's degree (Environmental/Social Sciences, Civil Engineering, Development Studies, etc.) with 3+ years' experience, or Bachelor's with 5+ years' experience in MDB-funded projects	Leads safeguards policy development; coordinates E&S compliance across projects; supervises safeguards team; ensures donor compliance; oversees GRM, disclosure, and capacity building	Reports to SPIU Coordinator	01
Social Safeguards Specialist	Master's or Bachelor's in Social Sciences, Sociology, Development Studies, etc. with relevant experience	Oversees RAP implementation; ensures social safeguards integration; coordinates with districts and donors; manages GRM and social indicators	Reports to Program Manager	04
Environmental Safeguards Specialist	Master's or Bachelor's in Environmental Sciences, Natural Resources, Forestry, GIS, etc. with experience in ESIAs/ESMPs	Manages environmental assessments; supervises ESMP implementation; conducts environmental monitoring and audits; ensures contractor compliance	Reports to Program Manager	04
Environmental & Social Safeguards Officer	Bachelor's degree in relevant environmental/social fields with 1+ year experience	Supports RAP/ESMP implementation; monitors project sites; ensures ESMP compliance; supports grievance follow-up and reporting	Reports to Program Manager	10
Gender Specialist	Master's or Bachelor's in Gender Studies or Social Sciences with gender mainstreaming experience in infrastructure projects	Integrates gender considerations into projects; manages GBV/SEA risk mitigation; prepares gender reports; supports policy and advocacy	Reports to Program Manager	01

Local Community Development Officer	Bachelor's in Community Development, Sociology, Rural Development, or related field with 3+ years' experience	Leads community mobilization; supports participatory approaches; oversees Local Community Associations; implements awareness programs	Reports to Program Manager	01

Annex 3: List List of Participants Who Attended the ESSA Validation Workshop in Kigali, Rwanda



MINISTRY OF FINANCE AND ECONOMIC PLANNING

Date: 08/07/2026

Attendance List — 2026/27 ESSA Validation workshop — VENUE: MINECOFIN

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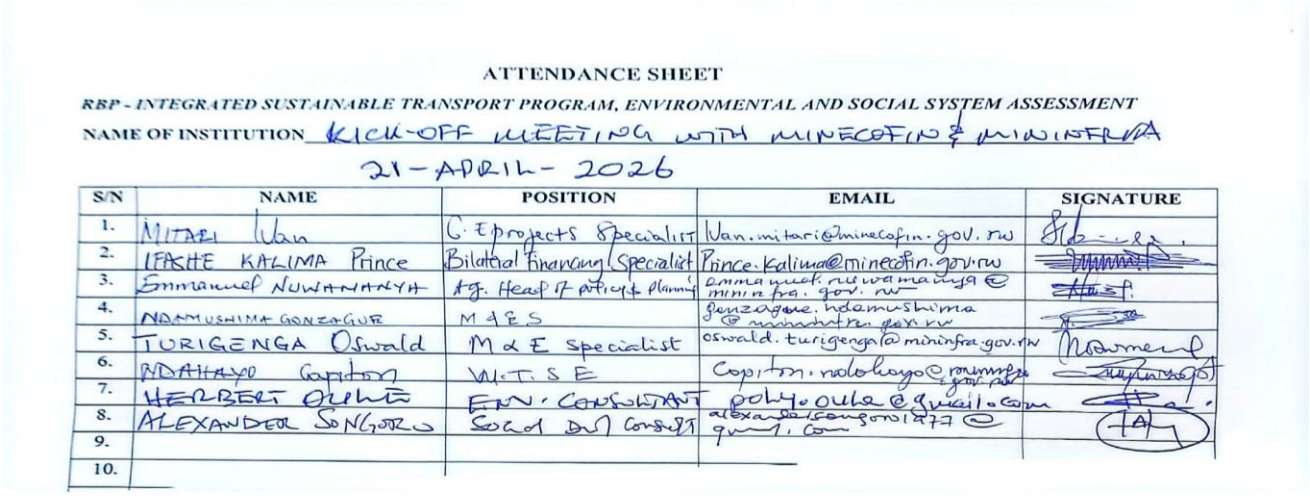
MINISTRY OF FINANCE AND ECONOMIC PLANNING

Date: 08/07/2026

Attendance List — 2026/27 ESSA Validation workshop — VENUE: MINECOFIN

No.	Name of the participant	Institution	Position	Email Address	Phone No	Signature
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11						

Annex 4: List of stakeholders and institutions consulted during the preparation of this ESSA.



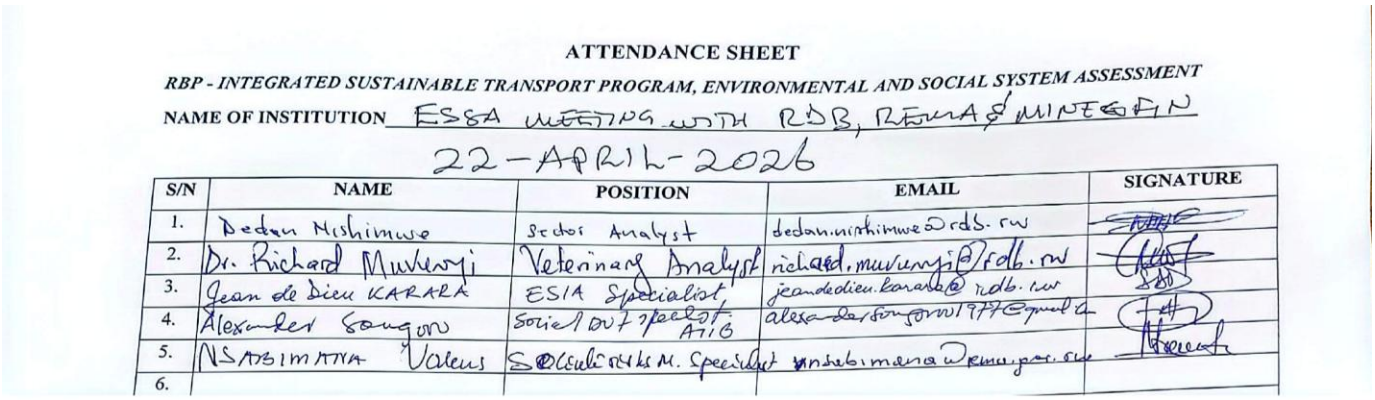
ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

NAME OF INSTITUTION KICK-OFF MEETING WITH MINECOFIN & MININFRA

21-APRIL-2026

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ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

NAME OF INSTITUTION ESSA MEETING WITH RDB, REMA & MINECOFIN

22-APRIL-2026

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ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

NAME OF INSTITUTION ESSA MEETING WITH RAC, RA & ATL

23-APRIL-2026

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12.	ALEXANDER SONGORO	Social DEV Consultant	alexandersongoro1994@gmail.com	
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ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

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23-APRIL-2026

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6.	Alexander Songoro	Social DEV Consultant	alexandersongoro1994@gmail.com	
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ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

NAME OF INSTITUTION ESSA DEBRIEF MEETING

29-APRIL-2026

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8.	MEX Mulisa	Consultant	MINECOFIN	
9.	CLAUDINE Imanizabayo	Consultant		
10.	PETRONILLE	SOCIALIST SPECIALIST	AIIB	ONLINE
11.	ERIC NSHIMYUMUREMYI	Senior Env Specialist	AIIB	ONLINE
12.	ANNE			
13.				
14.				
15.				

ATTENDANCE SHEET

RBP - INTEGRATED SUSTAINABLE TRANSPORT PROGRAM, ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

NAME OF INSTITUTION

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4.				
5.				

Annex 5: Ongoing and Recently Implemented Road Projects by RTDA and Their Funding Sources

Project Name	*Location*	*Scope*	*Key activities*	*Finances*	*EsBudget*
Kibugabuga–Shinga–Gasoro Road Project	Eastern Province	66.56 km	The project scope is the upgrading of the 66.55 km Kibugabuga–Shinga–Gasoro road to paved standards under a Design-Build-Maintain arrangement, including long-term maintenance and operation to improve connectivity, transport efficiency, and socio-economic development in the corridor.	World Bank financed	USD $52 million
Base-Gicumbi-Rukomo-Nyagatare Road (124.3km)	Eastern Province	124.3km	The project scope includes upgrading the road to asphalt standards, improving drainage systems, and installing road safety features along the Base–Rukomo–Nyagatare corridor to enhance durability, safety, and transport efficiency.	African Development Bank and the Government of Rwanda	US$78.99 Million
Huye–Kitabi Road	Southern Province	53 km	The project involved rehabilitating and widening the 53 km Huye–Kitabi road, including additional upgrade sections and landslide protection works, to improve cross-border connectivity, enhance access to production zones and markets, and support socio-economic development.	Government of Rwanda, BADEA; OPEC Fund, and the Saudi Fund	RWF 29.8 billion.
Rubengera–Gisiza Road	Western Province	23.6 km	The project involves constructing and paving the 23.6 km Rubengera–Gisiza	BADEA, KFAED, SFD,	US$ 52.7Million

			road section, including a small concrete bridge, road safety infrastructure, and consultancy services, to improve regional connectivity and access to socio-economic services.	Government of Rwanda	
Rwanda Feeder Roads Development Project (FRDP)	Multiple Districts (10)	749km (overall program)	Rehabilitation of feeder roads, drainage works, and rural accessibility improvements, as well as construction of social-economic infrastructures.	Multi-phase (USAID,World Bank, CIF , Government of Rwanda and the Kingdom Netherlands.	USD $161,500,000
Nyacyonga–Mukoto Road Project	Kigali City & Northern Province	36 km	Road upgrading, drainage, junction improvements, land acquisition and compensation	Financed by OPEC Fund & BADEA	US$41 million.
Kigali–Muhanga Road Project	Kigali City to Southern Province	~45 km	The project involves rehabilitating and expanding the 45 km Kigali–Muhanga road by upgrading it to a safer, higher-capacity corridor through lane widening, addition of climbing lanes for heavy vehicles, and bridge construction to reduce congestion and improve transport efficiency.	Financed by Korea Exim Bank	US$120 million.
Karongi–Kiziba Refugee Camp Road	Western Province	14.5 km	Road construction, drainage Improvement, connectivity improvements	World Bank financed	US$17.4 Million
Rwanda Emergency Connectivity Restoration	Western and Southern Province	384km	The project focuses on rehabilitating and strengthening flood- and landslide-damaged roads and bridges across Rwanda	World Bank financed	US$93.68 million

Project (RECoR)			to restore connectivity and economic activity, while integrating climate-resilient infrastructure, social safeguards, and institutional capacity building.		
Kagitumba-Kayonza-Rusumo	Eastern Province	208km	The project involved the rehabilitation and upgrading of the 208 km Kagitumba–Kayonza–Rusumo road to establish a resilient, efficient transport corridor linking Rwanda to the Northern and Central Corridors, thereby enhancing regional trade, connectivity, and socio-economic development.	Co-financed by AfDB, JICA, and the Government of Rwanda.	US$164 million

Annex 6: World Bank Comments on RBP ESSA Findings During Validation Workshop:

1. RDB ESIA Unit Critical Staffing Crisis : The Rwanda Development Board's ESIA Unit, which serves as the national gateway for environmental impact assessment review and certification, had only one of five positions filled at the time of the ESSA assessment in April 2026. This is the same gap identified by the World Bank in 2022, meaning the capacity crisis has persisted unresolved for at least four years. A single staff member cannot sustain timely, thorough, or quality-assured review of ESIA submissions for a growing national infrastructure portfolio. The unit has no residual capacity for site verification or post-approval compliance monitoring. For RISTP specifically, this creates a regulatory bottleneck that could delay environmental certification of all roads sub-projects, directly affecting the annual work plan cycle and DLI achievement timelines. *To address this gap, RDB should immediately increase staffing levels within the ESIA Unit and provide targeted capacity-building and specialized training for reviewing complex infrastructure projects. The unit must allocate adequate resources for regular site verification, compliance monitoring, and post-approval follow-up inspections. Standardized ESIA review procedures including checklists, templates, and review criteria should be developed to ensure consistent and transparent assessments. Strengthening inter-agency collaboration with REMA, RTDA, and district environment officers would also help distribute oversight responsibilities and reduce pressure on the central unit.*

2. Rwanda Labour Inspectorate Insufficient Enforcement Capacity : The Rwanda Labour Inspectorate conducted only 68 construction sector inspections in 2024–25 and 74 in 2025–26 across the entire country numbers that are manifestly insufficient relative to the scale of Rwanda's growing infrastructure investment pipeline. Labour inspectors have limited specialization in construction OHS, inadequate monitoring equipment, and inconsistent geographic coverage at the district level. Enforcement of OHS requirements across project sites is weak, reporting of occupational accidents and safety violations is delayed, and the ILAS digital public interface is not yet operational. These systemic limitations mean that field-level OHS compliance on RISTP worksites cannot be assumed, regardless of what the regulatory framework requires on paper. *To address these gaps, OHS requirements must be integrated into all procurement and contract documents, placing binding compliance obligations directly on contractors rather than relying solely on external inspections. RTDA and ATL should allocate dedicated OHS budget lines and recruit qualified OHS personnel to provide in-house oversight. A formal coordination protocol or Memorandum of Understanding between RTDA and the Rwanda Labour Inspectorate should be established within the first month of project effectiveness, providing the basis for joint site inspections, compliance monitoring, and accident investigations. Regular OHS risk assessments, safety training sessions, and contractor awareness programs should be institutionalized as standard practice throughout implementation.*

3. OHS Deficiencies on Active RTDA Construction Sites: During field visits to active RTDA-financed road construction sites, the ESSA team directly observed specific occupational health and safety deficiencies: workers without adequate personal protective equipment, poor segregation of construction activities from road users, weak safety signage, and insufficient speed control measures in active work zones. These are not hypothetical risks; they are observed conditions on projects currently under implementation. The severity of this gap is

underscored by RTDA's own record of ten fatalities across its road project portfolio between 2015 and 2025, spanning World Bank and AfDB-financed projects. This confirms that the gap between policy requirements and field-level practice is systemic and has had fatal consequences. *To close this gap, effective monitoring and reporting systems for contractor compliance covering site inspections, incident reporting, and corrective action plans must be established within three months of contractor contract signing. Regular joint inspections involving both RTDA safeguards officers and Rwanda Labor Inspectors should be conducted throughout construction. Codes of Conduct must be enforced for all project workers, and accessible worker grievance mechanisms should be operational from the outset of implementation. OHS compliance must be treated as a contractual condition with clear penalties for non-compliance, not merely a reporting requirement.*

4. Land Acquisition and Resettlement District-Level Bottlenecks. Road widening, realignment, and drainage improvements necessary for safety and climate resilience will trigger physical and economic displacement of Project Affected Persons even within existing road corridors. The ESSA identifies delays in the approval of expropriation files at district and City of Kigali levels as a documented, recurring challenge across RTDA's portfolio not an emerging or speculative risk. Urban-rural disparities in land and property valuation create inconsistency and contestation in compensation processes. Limited technical capacity at the decentralized district level for valuation review and grievance management compounds these delays. Where compensation financing has not been built into project budgets upfront, retrospective budget allocations have further extended delays. Under an RBP modality, where DLI achievement is time-bound, land acquisition delays translate directly into construction commencement delays and missed disbursement targets. *To manage this risk, RTDA must conduct early screening of all rehabilitation, upgrading, and maintenance activities to identify land acquisition needs and PAP impacts before contractor mobilization. Clear scope change management procedures must be established to ensure that design modifications triggering additional land acquisition are promptly identified and assessed. Adequate contingency budgets for compensation and resettlement must be built into annual work plans before contractors are mobilized. Site-specific Resettlement Action Plans or Abbreviated RAPs must be prepared and implemented prior to civil works commencement, not concurrently. RTDA must strengthen coordination with district authorities and valuation institutions to expedite expropriation file review and approval, and must maintain accessible, regularly monitored grievance mechanisms to track and resolve compensation disputes throughout implementation.*
5. RTDA Safeguards Capacity Overstretch. Despite having the strongest E&S institutional foundation among the implementing agencies with a Compliance and Safeguards Unit of 25 professionals RTDA's safeguards capacity is already stretched by its growing project portfolio. RISTP adds a nationwide scope of road maintenance and improvement activities on top of existing commitments that span multiple ongoing MDB-financed projects. The overstretch is structural: more projects are being added to the pipeline without a commensurate increase in safeguards personnel. Compounding this, RISTP is the first RBP/Results-Based financing engagement RTDA has undertaken, requiring the agency to build new institutional processes annual work plan submission to AIIB, DLI verification procedures, scope change management protocols from scratch while simultaneously managing implementation. Decentralized capacity at district level for E&S oversight also remains insufficient, creating supervisory gaps in remote or rural worksites. *To address these gaps, RTDA must recruit additional E&S*

officers and specialists specifically assigned to RISTP activities, rather than relying on existing staff to absorb the additional workload. Institutional capacity on RBP-specific processes including annual work plan preparation, AIIB clearance timelines, and DLI verification methodologies must be built early in the program cycle. Annual work plans must be submitted to AIIB for review and clearance before each implementation cycle begins, confirming that no Category A activities are included. All sub-projects must be screened using agreed exclusion criteria, and Rwanda's Procedural Manual for Environmental and Social Management in Transport Projects must be formally adopted and consistently applied across all RISTP activities throughout implementation.

6. MININFRA E&S Unit and GRM. The Ministry of Infrastructure, which is responsible for Component 3's institutional capacity-building activities targeting over 800 transport sector trainees annually, has no dedicated Environmental and Social Unit and no ministry-level Grievance Redress Mechanism. Environmental and social matters are managed on a project-by-project basis with no institutional continuity or specialized oversight. The absence of a GRM is a significant gap because MININFRA directly implements training allocation decisions that affect which individuals and institutions benefit from the program. Without guidelines or a complaints mechanism, there is a material risk of exclusion from training opportunities based on gender, geographic location, or institutional affiliation exclusions that would go undetected and unremedied. *To address this, MININFRA must develop capacity-building and training allocation guidelines within six months of RBP effectiveness to ensure fair, transparent, and inclusive access to program-supported training. A new section incorporating these mechanisms should be added to the Procedural Manual for Environmental and Social Management in Transport Projects. A basic GRM should be established at MININFRA level to receive, record, and resolve grievances related to the capacity-building component, including complaints about training access, selection processes, and program delivery.*

7. Nyungwe National Park High-Sensitivity Biodiversity Corridor. The Huye Nyamagabe–Buhinga–Rusizi national road (123 km) passes through Nyungwe National Park, a UNESCO World Heritage Site. Road rehabilitation and maintenance activities in this corridor carry risks of wildlife disturbance, roadkill, habitat fragmentation, increased human access to a protected ecosystem, and vegetation clearance in a globally significant biodiversity zone. The ESSA has correctly excluded road widening and new alignment within the park, confining activities to spot improvements only. However, the enforcement of this restriction in the field — particularly against contractor pressure to expand scope for operational efficiency is itself a risk. The classification of road works as Category B (partial environmental assessment only) may also underestimate cumulative or long-term biodiversity impacts in a corridor of this sensitivity. *To manage these risks, the spot-improvement-only restriction must be strictly enforced, with no exceptions for widening or realignment within park boundaries. Speed cameras and road humps must be installed to enforce the mandatory 40 km/h speed limit within the park, supplemented by enhanced signage and increased patrolling frequency. Environmental and Social Management Plans for all works in the Nyungwe corridor must be reviewed jointly with RDB and the Park Authority before civil works commence. Multi-institutional supervision involving RTDA, RDB, and the Park Authority must be maintained throughout the construction period to monitor compliance and respond immediately to any scope creep or unexpected biodiversity impacts.*

8. GBV, SEA/SH, and Child Protection. Labor influx associated with road construction particularly for feeder road works in rural areas creates well-documented risks of Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment. These risks are heightened in communities where vulnerability is higher and institutional response capacity is lower. Neither RTDA nor ATL has institutionalized project-specific SEA/SH management procedures at the time of the ESSA. The legal framework is supportive, Rwanda's Law No. 59/2008 on GBV prevention and Law No. 71/2018 on child protection provide the statutory basis, and the Rwanda National Police's specialized GBV desks and the National Public Prosecution Authority provide institutional enforcement channels but the project-level mechanisms to activate these pathways have not yet been put in place by the implementing agencies. *To close this gap, Codes of Conduct that are binding on all project workers and contractors must be adopted before construction commences. Confidential reporting channels and survivor-centered response protocols must be established and communicated to workers and communities. Referral pathways to Rwanda National Police GBV desks and the NPPA must be formalized and tested. Contractor compliance with SEA/SH measures must be a contractual condition verifiable through monitoring reports and all project workers must receive training on expectations and consequences within three to six months of project effectiveness.*

Annex 7: Gender Monitoring Office (GMO) Feedback & Input for the ESSA Multi-Stakeholder Consultation – Rwanda Integrated Sustainable Transport Program (RISTP)

Afternoon Discussion Session | Prepared for the Chief Gender Monitor

This input is offered in direct support of the ESSA's stated purpose — assessing the **adequacy of Rwanda's environmental and social management systems** and identifying measures to strengthen their effectiveness — read against Rwanda's **National Gender Policy (2021)** and the **National Investment Policy (2023)** gender-transformative economy objective.

1. GMO / MIGEPROF Were Not Part of ESSA Preparation

- The ESSA notes site-visit consultations with **REMA, the Labour Inspectorate, RDB, and RTDA** (Section: Social Risks and Impacts), and cites a stakeholder-prioritization process (Section: Implementing Institutional Arrangements). Neither GMO nor MIGEPROF appears among the institutions consulted in preparing the draft.
- Ask: **today's workshop should not be GMO's only entry point.** Request formal inclusion as a standing safeguard partner in subsequent ESSA/PAP review cycles, not a one-off validation invitee.

2. Protection Is Addressed; Inclusion / Empowerment Is Not

- Strength: the ESSA is well grounded on GBV/SEA-SH risk — Law No. 59/2008, the National Policy Against GBV, and RTDA's existing Gender Specialist role are all cited (Sections: Legal Framework for Social Risk Management; Operational Performance and Institutional Capacity Assessment).
- Gap: the same section cites the National Gender Policy's pillars of *"gender mainstreaming, capacity building, and women's empowerment"* (Policy and Legal and Regulatory Framework for Social Management), yet the Program Action Plan operationalizes only the protection pillar.
- Ask: add a measurable **women's participation target** for Program-generated jobs/contracts, and **sex-disaggregated indicators** in the PAP/results framework — not only in the GRM.

3. Institutional Capacity — Human and Financial, Across All Implementers

- RTDA: a single Gender Specialist covers the entire road portfolio (Annex 2: RTDA Safeguard Staff) — ask whether this is adequate at peak multi-site implementation.
- ATL/RAC: no dedicated gender or SEA/SH focal point exists; provisions remain informal within the HR Manual (Section: Legal and Policy Position). Ask for a **funded, named position** mirroring RTDA's model before Program effectiveness.
- Contractors: request confirmation that GBV/SEA-SH prevention costs (Codes of Conduct, training, community liaison) are costed into contract BoQs, not left as an unfunded expectation (To Program Action Plan).
- GMO's own participation in ongoing monitoring should likewise be budgeted within the Program, not assumed on goodwill.

4. Accountability — Operationalizing GMO's Mandate

- The National Investment Policy (2023) mandates GMO to *"conduct regular audits and evaluations of the implementation of gender and social inclusion policies,"* and MIGEPROF to analyze investment proposals for gender inclusiveness.
- Ask that the PAP assign GMO a **periodic (e.g., semi-annual) audit and verification role** over RTDA, ATL/RAC, and contractors, with GRM data on GBV/SEA-SH cases shared for independent review (respecting survivor confidentiality under Law No. 59/2008).
- Findings from this audit function should feed a **documented corrective-action loop tracked within the PAP** itself — turning oversight into a mechanism with consequence, not an advisory comment.

Bottom line: the ESSA's systems are adequate for managing harm. They are not yet adequate for promoting inclusion or verifying results over time. GMO recommends the PAP be revised to fund gender/SEA-SH capacity at every implementing entity and to formally anchor GMO's audit mandate within it.

Annex 8: Corrective Action Request (CAR) Form

CAR Number:	Date Issued:	STATUS: OPEN

1. CAR IDENTIFICATION

Issued To (Contractor)		Category	

2. INCIDENT /ACCIDENT/ NON-CONFORMANCE DESCRIPTION

Date of Incident		Time		Date of Joint Inspection	
Location					
Vehicle Involved					
Casualties / Injuries		Structural Damage			
Description of Non-Conformance / Incident					

3. ROOT CAUSE ANALYSIS

Primary Cause
Contributing Factors

4. CORRECTIVE ACTIONS REQUIRED

#	Corrective Action	Responsible Party	Due Date	Status
1				
2				
3				
4				
5				
6				

5. PREVENTIVE ACTIONS (TO AVOID RECURRENCE)

Systemic Preventive Measures

.			
Training Required		**Monitoring Frequency**	

6. VERIFICATION & CLOSURE (To be filled on closure)

Verification Date		**Verified By (CSC)**		**Closure Date**	
Closure Remarks					
CAR Status at Closure	[ ] Closed satisfactorily [ ] Partially closed [ ] Escalated				

7. SIGNATURES

Issued by (CSC):	**Acknowledged by (Contractor):**	**Reviewed by (Team Leader):**
_____ CSC Representative Aarvee Engineering consultants Pkg-4 Date:	_____ Contractor Representative M/s AMRIL-IRCON (JV), Pkg-4 Date: _____	**Name** Team Leader cum Contract Admin Specialist Date:_____

9. References

Law No. 48/2018 of 13/08/2018 on Environment (Rwanda); Environmental Impact Assessment Guidelines 2006; Ministerial Order No. 001/2019 of 15/04/2019; Law No. 55/2011 of 14/12/2011 Governing Roads in Rwanda; LAW No. 001/2023 of 13/01/2023 Governing National Parks and Nature Reserves; Law No. 046/2024 of 04/06/2024 Governing Forests and Trees in Rwanda; Law Governing Biodiversity in Rwanda (N° 70/2013 of 02/09/2013): Ministerial Order N°27 of 27/08/2018 Determining Modalities for Concluding a Concession Agreement for Tourism Investment in Protected Areas; Regulation No 002 of 26/04/2018 Governing E-Waste Management in Rwanda; Law No. 72/2019 of 29/01/2020; Labour Law No 66/2018 of 30/08/2018 (Rwanda); Law No 71 of 2018: Protection of the Child in Rwanda; Law No. 59 of 2008 on Prevention and Punishment of Gender-Based Violence (Rwanda); Law No. 27/2021 of 10/06/2021 Governing Land in Rwanda; Rwanda Traffic Law (Presidential Order No 25/01 of 25/02/2015 Modifying the General Traffic and Road Traffic Regulations); Law No 20/2018 of 29/04/2018 Establishing Regulations Governing Civil Aviation (Rwanda); and Law No 10/2012 of 02/05/2012 Governing Urban Planning and Building in Rwanda:

Isimbi, R, Simpunga, D. M and Domingo P. (2018). Policy and legal analysis notes: Rwanda A review of the National Policy against Gender-Based Violence. GAGE Research Brief. London: Overseas Development Institute/GAGE

National Institute of Statistics of Rwanda (NISR), fifth Rwanda Population and Housing Census (2022 RPHC)

National Institute of Statistics of Rwanda (NISR). (2021). Rwanda Demographic and Health Survey 2019-20 Final Report

Ologede, I., Olojede, I. B., & Busayo Qazeem, I. (2020). Gender-Based Violence and Socio-Economic Development in Lagos State, Nigeria. Sapientia Foundation Journal of Education, Sciences and Gender Studies (SFJESGS), 3(4), 69–83.

UN Women. (2023). Global database on Violence against Women. Retrieved from Women

World Bank (2022): Rwanda Environmental and Social Risk Management Capacity Needs Assessment: Background Paper (Draft for Discussion). Rwanda World Country Office.