

Intended for

**Bugesera Airport Company Limited**

Date

**January 2018**

Project Number

**UK11-24483**

# **NEW BUGESERA INTERNATIONAL AIRPORT ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT REPORT- STAKEHOLDER ENGAGEMENT**

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## 7. STAKEHOLDER ENGAGEMENT

### 7.1 Introduction

Stakeholder engagement is a key element of the ESIA process. It is now standard practice for the ESIA process to include information disclosure followed by consultations with stakeholders. Stakeholders are individuals, groups and organisations whose interests may be affected by a proposed project and who may have an ability to influence decisions concerning the location(s), construction and operation of the project prior to, and during, the approval process. Disclosure and consultations are required throughout the ESIA process and, also, during the post-approval construction and operation phases of a project.

This chapter includes a presentation of the stakeholder engagement (that is information disclosure and consultation activities) carried out for this ESIA Report. The ESIA consultation activities were conducted in accordance with a Stakeholder Engagement Plan (SEP) that was prepared at the beginning of the ESIA process (Section 7.3).

The main objectives of stakeholder engagement are to:

- Ensure that adequate and timely information is provided to stakeholders affected by the Proposed Project;
- Provide stakeholders with sufficient opportunity to provide their opinions and comment upon the risks, impacts and opportunities posed by the Proposed Project; and
- Ensure that stakeholder comments are received in a timely manner so that they can be considered in both the ESIA process and Proposed Project decisions.

The stakeholder engagement, undertaken for the ESIA process, was designed to be both robust and compliant with IFC PS1; therefore, its implementation, recording of consultation outcomes and provision of feedback to stakeholders, regarding their concerns/impact issues, are believed to meet all Lender requirements.

This chapter is accompanied by the following technical appendices:

- Technical Appendix 7.1: Stakeholder Engagement Plan;
- Technical Appendix 7.2: Proposed Project Leaflet in English and Kinyarwanda; and
- Technical Appendix 7.3: Example Copies of Meeting Minutes.

### 7.2 Previous Stakeholder Engagement

During the preparation of the Draft ESIA Report (2010), stakeholder engagement was undertaken with a range of stakeholders: central government ministries and agencies, non-governmental organisations (NGOs)/community-based organisations (CBOs), and Affected Communities (villages). The consultations and their results are presented in a dedicated and detailed chapter in the Draft ESIA Report (2010).

Twenty-five villages, from Ntarama, Kimaranzara and Karera Cells, were consulted by several means as follows: six clustered public meetings (up to four or five villages involved in a single public meeting in a central location); focus groups of 'opinion leaders' at cell level; group discussions with Sector Officials and opinion leaders in Rilima and Juru Sectors; and 'separate discussions' with women and youths at sector level. Very limited detail is provided on the numbers of people involved in these consultation events or their characteristics (for example, place of residence and sex/age breakdown).

No information is provided on the names of the villages involved in the public meetings, but it can be inferred that most of the villages were those located within the area of land to be leased, by MININFRA, to BAC for the airport site (area of approximately 25.5 km<sup>2</sup>). A detailed account

of the results of the public meetings, focus groups and other meetings is provided. In a summary of the 'public' consultations it is stated that,

*"Generally, perception of the people on the NBIA project is positive. According to various discussions made with community members and opinion leaders in and around the project area, the project was deemed as good for the development of the area, district and the country as a whole.*

*Owing to NBIA being a government project, the people within the project area did not have any other choice but to consent to the project. However, the major concern is the issue of relocation and compensation that needs to be addressed carefully so that the livelihood of the people is not adversely impacted upon."*

The detailed presentation of the results of the 'public' consultations, especially those involving villages and focus groups of local people gives many examples of concern about relocation and compensation. In particular, complaints were raised regarding the 'ban' on any kind of economic development in the Proposed Project Area. The 'ban' was deemed harmful to the interests of the villagers as they were not able to invest/expand their economic activities whilst waiting to be relocated and receive compensation at an undetermined time.

In the very early stages of work to prepare this ESIA Report, several fact-finding meetings were held with national and local government stakeholders in the week beginning 15 May 2017. The list of meetings is provided in Table 7-1. The objectives of these meetings were as follows:

- Introduction of project team to government agencies; and
- Discussion of the Proposed Project and way forward with regards to roles, responsibilities and functions.

<b>Table 7-1: Stakeholder Meetings, May 2017</b>			
<b>Date</b>	<b>Stakeholder</b>	<b>Location</b>	<b>Reason</b>
16 May 2017	Ministry of Infrastructure	Ministry of Infrastructure offices, Kigali	Meeting to discuss the Draft ESIA Report (2010), resettlement activities and the current Proposed Project Master Plan
17 May 2017	Rwandan Civil Aviation Authority	Mota-Engil offices in Kigali	Meeting to discuss the Draft ESIA Report (2010) and the current Proposed Project Master Plan and Authority requirements
17 May 2017	Bugesera District Deputy Mayor and Executives of Rilima and Juru Sectors	Proposed Project site, Bugesera	Meeting to discuss the Proposed Project Master Plan and stakeholder engagement
18 May 2017	Rwanda Land Management and Use Authority	Nyarugenge Pension Plaza Building, Kigali	Meeting to discuss land referencing activities undertaken by the Authority and to request shapefile baseline mapping to use in work to prepare the new ESIA Report

<b>Table 7-1: Stakeholder Meetings, May 2017</b>			
19 May 2017	Rwanda Development Board/Rwanda Environment Management Authority	Rwanda Development Board offices, Kigali	Meeting to discuss the Draft ESIA Report (2010), the current Proposed Project Master Plan and the proposed new ESIA approach, and REMA's. RDB's EIA application, review and approval processes
19 May 2017	Sector-level REMA office	Sector-level REMA office, Bugesera	Discuss ESIA issues from the Sector perspective

These meetings provided valuable baseline data that were used in preparation of the Scoping Report and this ESIA Report.

### 7.3 Stakeholder Engagement Plan

In compliance with IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts and in accordance with Good International Industry Practice (GIIP), a Stakeholder Engagement Plan (SEP) was prepared in July 2017 and updated in August 2017 (Technical Appendix 7.1). The SEP was prepared to be aligned with:

- Rwandan regulatory requirements for preparation of EIA Reports<sup>1</sup>; and
- IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts (and the accompanying Guidance Note 1).

The SEP focuses on stakeholders who do not have formal relationships with BAC and the Proposed Project. Mechanisms for engagement with customers, contractors, shareholders and lenders, with which BAC has regular contact through its business activities, are not addressed in the SEP.

#### 7.3.1 Rwandan EIA Requirements

Rwandan EIA legislation and implementing guidelines<sup>2</sup> contain specific provisions regarding stakeholder engagement and the EIA process. In the guidelines, it is stated that, *"...from a social standpoint, EIA incorporates interests of public and private stakeholders, residents and communities in the planning and approval process of projects."* The guidelines are not detailed, but the intent is clear. Stakeholders, including communities, are to be consulted early in the EIA process; especially during the scoping phase when a project brief is to be prepared by the developer for submission to REMA for review and for them to develop a Terms of Reference for the EIA. Stakeholders can also be consulted at other times during the EIA process and, particularly, play a role, in advising, *".... project developers and Rwanda Environment Management Authority on approaches to avoid, minimise or compensate for adverse environmental impacts."*

EIA Reports and accompanying Environmental Management and Monitoring Plans (EMMPs) are submitted to the Rwanda Environment Management Authority (REMA/Rwanda Development Board (RDB), which are mandated to consult with other government entities (by providing them with copies of the EIA Report and EMP for review and comment). REMA/RDB are also responsible

<sup>1</sup> In Rwanda, there is a requirement to undertake an EIA to meet national laws and regulations. In the case of the Proposed Project, an ESIA will be undertaken to meet these national requirements as well as international standards.

<sup>2</sup> Rwanda Environment Management Authority, 2006. *General Guidelines and Procedure for Environmental Impact Assessment*.

for organising and implementing public hearings as an input to the 'approval' process for a project. Public hearings are thus the main mechanism for community stakeholders to be involved as part of the EIA process.

Local governments also play an important role in the local-level aspects of managing the public hearings and in conveying local stakeholder comments on both the project and the disclosed EIA Report and EMP to REMA/RDB. Few details are provided on how this should be done by local governments. Project developers do not play a lead role; however, they are expected to participate in all public hearings.

### 7.3.2 International Finance Corporation Requirements

IFC PS1 sets out the following objectives/actions with regard to stakeholder engagement:

- *"To identify the range of stakeholders that may be interested in project activities and to facilitate a dialogue with them through a process of external communications;*
- *To promote and provide means for adequate engagement with Affected Communities and to ensure that relevant environmental and social information is disclosed and disseminated;*
- *To provide Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;*
- *To undertake a process of consultation in a way that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them;*
- *To take account of the results of the engagement process with Affected Communities and other stakeholders in the identification of risks and impacts associated with the project; and*
- *To establish a Grievance Mechanism to receive and facilitate resolution of stakeholders' concerns and complaints about a client's environmental and social performance".*

For projects with potentially significant adverse impacts, IFC recommends conducting an Informed Consultation and Participation (ICP) process that will result in the Affected Communities' informed participation. This process should be documented, especially the measures taken to avoid or minimise adverse impacts on Affected Communities, to inform those affected about how their concerns have been considered. The stakeholder engagement actions, presented in the SEP, aim to provide outcomes consistent with an ICP process. The SEP is a live document and will be amended to ensure consultation is conducted in a comprehensive, independent and transparent manner throughout the lifetime of the project.

The SEP presents the range of stakeholders to be consulted, consultation activities to be implemented, and links them to key stages in the ESIA process. The SEP aims are to ensure that:

- Adequate and timely information is provided to stakeholders;
- Stakeholders are given sufficient opportunity to voice their opinions and concerns; and
- These opinions and concerns are considered in determining the ESIA work and in project decision-making.

The SEP was developed as a flexible, working and 'live' document, to be used during the ESIA work, while still adhering to the Rwandan EIA and IFC PS1 requirements.

Initially, a draft version of the SEP was prepared, prior to initiation of the other key ESIA activities and was used as a basis for the consultations aimed at further informing the scope of

the ESIA Report. Subsequently, as necessitated by changes in the progress of the ESIA, the initial SEP was updated and amended. A copy of the SEP version that was used to manage all ESIA-related consultations is in Technical Appendix 7.1.

#### 7.3.3 African Development Bank Integrated Safeguard Systems Requirements

The African Development Bank (AfDB) Integrated Safeguard Systems Requirements (ISS) requirements for stakeholder identification and engagement follow the IFC requirements. Stakeholders should be engaged to obtain their input into the preparation of the scope of the ESIA, the draft ESIA Report and the draft ESMP.

### 7.4 Grievance Mechanism

#### 7.4.1 Introduction

BAC has an external communications function in place to receive, register and respond to external communications from such stakeholders as members of the public and the media. However, IFC PS1 includes a requirement to expand external communication activities to include a specific Grievance Mechanism.

For the purposes of the ESIA Report and SEP, external communications from stakeholders are considered to involve comments/concerns and grievances, as follows:

- Comments/concerns raised by an individual or group may, or may not, arise from a specific impact or incident that is related to a project activity. They can be positive or negative observations on general project performance and, also, can take the form of questions or requests for information; and
- A grievance is a complaint, raised by an individual or group, related to a specific impact or incident, which is considered to affect, adversely, the interests of the complainant.

#### 7.4.2 Comment/Concern Management

Comments/concerns will be conveyed to BAC via the same means as grievances (Section 7.4.3). Once received, they will enter BAC's external communication procedure and feedback will be provided according to the requirements of the procedure. Concerns will be identified and analysed every month in a report provided to the appropriate senior manager. This will alert managers to concerns, for example on increasing numbers of vehicle speed exceedances, which may soon give rise to grievances. This 'early warning' enables swift action to be taken to address the concerns and, thus, avoid the receipt of grievances in the future.

#### 7.4.3 Grievance Mechanism: Key Principles

The Grievance Mechanism is based on the following principles and attendant BAC commitments:

- Accessibility: Ensuring that the Grievance Mechanism is accessible to those who may wish to submit a grievance. It includes the ability to submit a grievance verbally;
- Disclosure: Publicising and explaining the Grievance Mechanism to all external stakeholders. This disclosure will be implemented in a format and language readily understandable to the local population and/or communicated orally in areas where literacy levels are low. In addition to informing stakeholders about the Grievance Mechanism, BAC will report back periodically to stakeholders on how it has been responding to the grievance it has received;
- Transparency: Clarifying at the outset who is expected to use the Grievance Mechanism, and assuring stakeholders that there will be neither costs nor retribution associated with lodging a grievance. Stakeholders will be informed that grievance can be submitted

anonymously and that they can request that their identity be kept confidential. The entire process – from how a grievance is received and reviewed, through to how decisions are made and, in the case of a grievance, the possibilities that exist for appeal – will be made as transparent as possible through good communications;

- Efficiency: Publicly communicating and committing to a timeframe within which all recorded grievance will generate a response and ensure that all response times are met. This will help to allay frustration by informing people when they can expect to be contacted and/or receive a response to their grievances. During critical time periods, such as during the project construction phase, it is important to have an early (if not immediate) response to time-sensitive grievances;
- Fairness: Ensuring that an appeal procedure for complainants who reject BAC's intended action to redress a grievance is in place. BAC will establish a Grievance Review Committee (GRC) to hear appeals; and
- Written records: Maintaining written records of all grievances received (comments/concerns will be recorded and tracked under a wider stakeholder engagement database) as this is critical for effective grievance management.

## 7.5 Stakeholder Identification

### 7.5.1 Introduction

IFC PS1 defines stakeholders as: *"...persons, groups or communities external to the core operations of a project who may be affected by the project or have interest in it. This may include individuals, businesses, communities, local government authorities, local nongovernmental and other institutions, and other interested or affected parties"*.

In line with the principles of IFC PS1, stakeholders are divided into two types:

- "Affected Communities – persons, groups and other entities within the Proposed Project Area that are directly influenced (actually or potentially, positively or adversely) by the Proposed Project and/or have been identified as most susceptible to change associated with the Proposed Project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures; and
- Non-community stakeholders who may be able to influence decisions on the Proposed Project, or have an interest in the Proposed Project".

To develop an effective stakeholder engagement process, it is necessary to identify stakeholders and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Proposed Project. This information was used to tailor engagement to each type of stakeholder. As part of this process, it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Proposed Project because of their marginalised or vulnerable status.

The key categories of stakeholders identified are:

- Affected Communities;
- National Government: Regulatory and Executive Institutions;
- Local Governments (Districts, Sectors and Cells);
- National/International NGOs;
- Local-level NGOs/CBOs;
- BAC/Contractor/Sub-contractor workforces; and



- Media.

#### 7.5.2 Affected Communities

Affected Communities are those communities located within the vicinity of:

- The designated Airport Area;
- The Expressway;
- The upgraded quarry road;
- The temporary construction and permanent operation phase water supply systems (abstraction, transfer and treatment facilities);
- Overhead transmission lines; and
- Flight paths.

For the purposes of stakeholder engagement, Affected Communities are defined as being those distinguishable settlements (by law, or by name, or by recognition of local people or all three of these criteria) located within areas defined by a:

- 2 km boundary around the boundary of the Airport Area;
- 2 km corridor, based on 1 km either side of the centre-line of the upgraded quarry road;
- 4 km wide corridor based on 2 km either side of the centre-line of the Expressway;
- 2 km corridor, based on 1 km either side of the centre-line of the temporary Water Pipeline right-of-way; and
- 2 km radius based on the water abstraction facility.

These communities/settlements are legally defined as villages in the local government hierarchy and, therefore, the term 'community' and 'village' are used interchangeably. As the routes of the two expected overhead transmission lines and water supply pipelines required for the operations phase of the Project are not known they have not been included in the approach to identify Affected Community stakeholders.

To assist with the initial identification of these communities, a set of 'distance' criteria were applied to determine the number of Affected Communities. These criteria were applied to the Proposed Project components and, using GIS, overlain on map layers showing District, Sector and Cell administrative borders. This provided a systematic way of identifying both local government entities and Affected Communities. The application of the 'distance' criteria was not rigid. If a community was located on the boundary, defining the distance criterion, then it was included.

Also, the 'distance' criteria are working tools only - to assist identifying those communities that need to be involved in stakeholder engagement – commensurate with the expected level of risk and impact. The 'distances' could be amended, as appropriate, to 'fine tune' the selection of communities to be engaged as they were not intended to be one-time, rigid criteria. In fact, only the distance criterion or the Proposed Project Area was amended to assist the process of community identification.

The boundaries of the linear Proposed Project components and the water abstraction facility are believed to be in accordance with a reasonable expectation that the communities, located beyond the boundaries would be unlikely to be affected by the key risks and impacts associated with the individual Proposed Project components: such as land acquisition and physical and/or economic displacement, increase in noise and vibration, air quality changes (such as increase in dust levels) and local-level impacts on ecosystem services. Application of the distance criteria for the linear components, including the water abstraction facility, resulted in the identification

of a 'manageable' number of communities, in terms of the constraints within which the stakeholder engagement work would be implemented.

In terms of the airport, communities had been relocated from within the Airport Area (25.6 km<sup>2</sup>) and the area was devoid of residents. Outside the 'boundary' of this area, the settlement pattern is varied, which is probably a function of many factors, not least the high population density that is typical of Rwanda. There are clearly visible 'compact' communities. However, there are dispersed settlements that merge with each other, particularly those along linear man-made features.

Initially, a 10 km boundary was applied to the Airport Area; then a 7 km and then a 2 km boundary. Only the 2 km produced a manageable number of communities. The 10 km boundary produced more than 100 communities. The 2 km boundary captures those communities, again, which will be most exposed to the risks and impacts associated with the construction and operation of the airport. Of course, those outside the 2 km boundary will also be affected, but the social baseline (Chapter 18 Socio-Economic) shows that rural areas of Bugesera District are relatively homogenous socio-economically so there is no reason to believe that villages just outside the 'distance' boundaries will be significantly different from those within them; thus consultations with those communities within the 2 km boundary may be expected, reasonably, to provide comments and concerns, regarding expected risks and impacts, that would be replicated by those communities outside the 2 km boundary.

Application of the 'distance' criteria on GIS mapping led to the identification of 42 communities (Table 7-2) located in:

- 2 Districts (Kicukiro and Bugesera);
- 7 Sectors (Gahanga, Ntarama, Mwogo, Juru, Rilima, Mayange, and Nyamata); and
- 11 Cells (Murinja, Kanzenze, Rurenge, Kabukuba, Rwinume, Nyabagendwa, Kabeza, Kibirizi, Murama, Kimaranzara and Ntarama).

Figure 7-1 shows the villages and their location with respect to the individual Proposed Project components. Of the villages listed in Table 7-2, only three (Gaseke, Gasave and Kivumu) are also mentioned in the list of 25 villages considered to be affected, in the 2010 Draft ESIA Report and have therefore previously been the focus of consultations. This is likely due to the fact that the 2010 Draft ESIA Report consultations focused mainly on villages within the Airport Area, which is now devoid of people. Gaseke, Gasave and Kivumu are all located very close to the border of the Airport Area.

Affected Communities include individuals/groups with range of diverse interests. Thus, the following intra-community stakeholder groups were identified to ensure that they were included into the community-level consultation process:

- Leaders/elders;
- Respected community members (teachers; medical staff; religious leaders);
- Groups dependent on specific livelihood activities (i.e. small to medium sized enterprises (SMEs), agriculture, fishing, crafts, public transport operators, others);
- Women;
- Youth;
- Community-Based Organisations (CBOs);
- Vulnerable people/households/groups (such as female-headed households; very poor households; disabled/chronically sick people; historically marginalized populations); and
- Local service providers (e.g. hotels, restaurants, local shops, transportation providers, etc).

Within communities, an early version of the SEP identified a potential need to consider consulting with focus groups representing different community-level livelihood strategies. However, the results of the social baseline work indicated that most households were dependent on subsistence farming and that there was little economic diversification. Thus, the need for these focus groups was abandoned.

<b>Table 7-2: Identified Districts, Sectors, Cells and Villages in relation to Proposed Project components</b>			
<b>Expressway</b>			
<b>Villages (10) to be consulted</b>	<b>Cell (3)</b>	<b>Sector (3)</b>	<b>District (2)</b>
Nyabigugu, Mugendo, Kwisanga	Murinja	Gahanga	Kicukiro
Kurugenge, Karumuna, Kabeza	Kanzenze	Ntarama	Bugesera
Kaziramire, Rurenge, Gatwe, Gatoki	Rurenge	Mwogo	Bugesera
<b>Upgraded Quarry Road</b>			
<b>Villages (7) to be consulted</b>	<b>Cell (2)</b>	<b>Sector (1)</b>	<b>District (1)</b>
Rushubi, Gikurazo, Kabukuba	Kabukuba	Juru	Bugesera
Kabeza, Katara, Rwimpyisi, Umwimpunga	Rwinume	Juru	Bugesera
<b>Airport Site Area</b>			
<b>Villages (17) to be consulted</b>	<b>Cell (4)</b>	<b>Sector (4)</b>	<b>District (1)</b>
Nyabagendwa, Murambi, Karama, Kamabuye	Nyabagendwa	Rilima	Bugesera
Kabeza, Karirisi, Karambi, Biraro	Kabeza	Rilima	Bugesera
Gacyamo, Rwakibrizi, Karambo, Gahinga	Kibirizi	Mayange	Bugesera
Bishweshwe, Mwesa, Rucucu, Gataraga, Kivugiza	Murama	Nyamata	Bugesera
<b>Water Supply Pipeline and Water Abstraction Facility</b>			
<b>Villages (8) to be consulted</b>	<b>Cell (2)</b>	<b>Sector (1)</b>	<b>District (1)</b>
Kimaranzara, Gasabo, Byimana, Amizero, Kivumu	Kimaranzara	Rilima	Bugesera
Gaseke, Gasave, Nyamure	Ntarama	Rilima	Bugesera

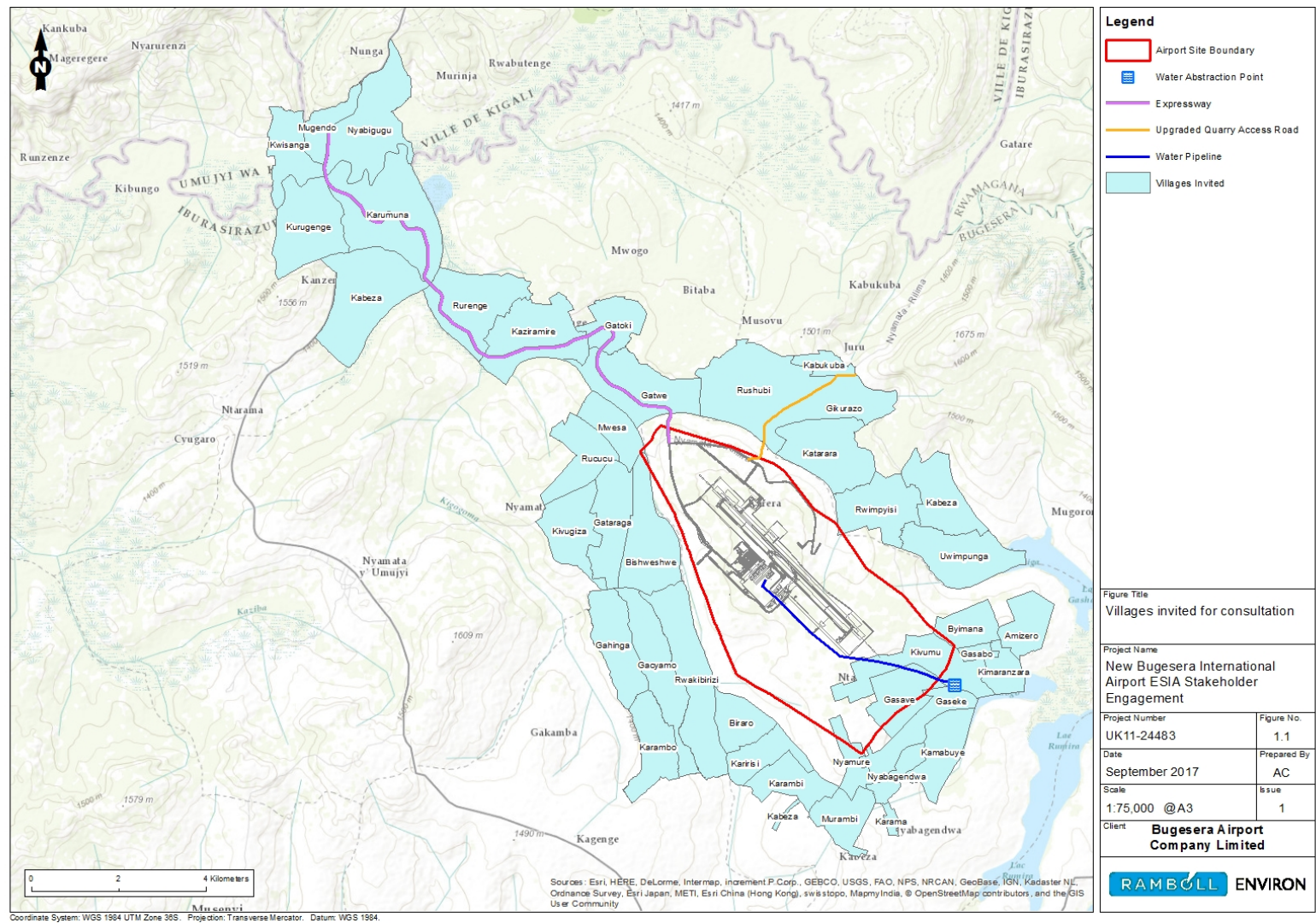


Figure 7-1: Location of the Villages

### 7.5.3 National Government: Regulatory and Executive Institutions

The key national government stakeholders consist of those with a formal role in the ESIA Report approval process and those with a recognised interest in the Proposed Project. These are:

- Ministry of Infrastructure (MININFRA);
- Ministry of Natural Resources (MINIRENA);
- Ministry of Agriculture and Animal Resources (MAAR);
- Ministry of Finance and Economic Planning (MFEP);
- Ministry of Gender and Family Promotion (MGFP);
- Ministry of Local Government (MLG);
- Single Project Implementation Unit (SPIU);
- Rwanda Development Board (RDB);
- Rwanda Environment Management Authority (REMA);
- Rwanda Water and Forests Authority (RWFA);
- Rwanda Land Management and Use Authority (RLMUA);
- Rwanda Water and Sanitation Corporation (RWSC);
- Rwanda National Planning Authority (RNPA);
- Rwanda Civil Aviation Authority (RCAA); and
- Rwanda Transport Development Agency (RTDA).

### 7.5.4 Local Government

There are four tiers of Local Government in Rwanda (provinces, districts, sectors and cells). Based on the 'distance criteria' and location of the Project components the following local governments were identified as stakeholders:

- Districts: Bugesera and Kicukiro;
- Sectors: Gahanga, Ntarama, Mwogo, Juru, Nyamata, Rilima, and Mayange; and
- Cells: Murinja, Kanzenze, Rurenge, Kabukuba, Rwinume, Nyabagendwa, Kabeza, Kibirizi, Murama, Kimaranzara and Ntarama.

The Proposed Project is in Eastern Province and almost entirely in Bugesera District. A very short section, at the northern end of the Expressway, is in Kicukiro District. Eastern Province is not identified as a stakeholder as the involvement of both Bugesera and Kicukiro Districts is sufficient to ensure adequate high-level local-government participation in the consultation process.

### 7.5.5 NGOs

All NGOs/CBOs were identified based on the following criteria:

- Previous involvement in consultations for the Draft 2010 ESIA Report;
- Registered with national/local government; and
- Local knowledge of the ESIA team.

An ESIA team member attended a meeting of local-level NGOs in Nyamata and the selection of local-level NGOs was confirmed after this meeting.

#### 7.5.5.1 *National/International NGOs*

The following National/International NGOs were identified:

- World Vision;
- ACCORD;
- Aegis Trust;
- Association pour la Conservation de la Nature au Rwanda;
- World Relief;
- Food for the Hungry;
- CECI;
- Plan International Rwanda;
- Human in Love;
- Fondazione Marcegaglia; and
- PPTI.

#### 7.5.5.2 *Local-Level NGOs/CBOs*

The following local-level NGOs/CBOs were identified:

- Right Home Children Rwanda;
- Young Women's Christian Association;
- Inspire Educate and Empower Rwanda;
- Rwanda Environment Case;
- MARANATHA-RUHUHA;
- RW891 CEL;
- Profemmes Twese Hamwe;
- GWIZINEZA;
- Local NGO Ntarama;
- CREDI-RWANDA; and
- COFORWA.

#### 7.5.6 BAC and Contractor/Sub-Contractor Workforces

The following stakeholders were identified:

- BAC workers;
- EPC Contractor workers;
- Sub-contractor workers; and
- Trade union representatives.

#### 7.5.7 Media

The following media outlets were identified:

- Rwanda Broadcasting Agency;
- Radio Rwanda and TV Rwanda;
- Radio 1 and TV 1;
- Radio 10 and TV 10;
- Contact FM and Contact TV;

- Igihe.com;
- Izuba Rirashe; and
- New Times.

BAC has existing relations with media organisations, which participate in the regular briefings and updates that BAC provides on the Proposed Project. Information on the Proposed Project and certain consultation events is provided through these channels.

## **7.6 Consultations and ESIA Scope of Work**

### **7.6.1 Introduction**

These consultations involved:

- National Government: Regulatory and Executive Institutions;
- Local governments;
- Affected Communities;
- International and national NGOs; and
- Local NGOs.

### **7.6.2 National Government: Regulatory and Executive Institutions**

National government institutions include those that will be issuing 'approvals' for the Proposed Project and those that have a legitimate interest in the Proposed Project and its likely impacts. REMA consulted a range of these institutions, after receipt of the Scoping Report, as part of its decision-making process on the adequacy of the Scoping Report.

### **7.6.3 Local Government**

Individual 'face-to-face' meetings were held with officials of each identified District (two meetings) and Sector (seven meetings). Prior to the meetings, copies of a leaflet in Kinyarwanda and English were distributed (Technical Appendix 7.2). These meetings followed a standard agenda as follows:

- Proposed Project/ESIA PowerPoint presentation;
- Clarification questions (on Proposed Project/ESIA presentation only);
- Discussion of Proposed Project/ESIA issues, concerns, and suggestions for issues/topics to be assessed in the ESIA Report; and
- Thanks/Close.

A senior BAC staff member was available to present the information on the Proposed Project/ESIA and answer clarification questions. A set of Frequently Asked Questions (FAQs) with standard answers was prepared prior to the meetings. An attendance record and a record (Minutes) of each meeting were prepared. Figure 7-2 shows a consultation meeting at one of the District offices.

Cell (11) leaders were met in the context of clustered meetings organised for consultations with the Affected Communities as detailed below.



**Figure 7-2: Consultations at Kicukiro District on 13/09/2017**

#### 7.6.4 Cells/Affected Communities

##### 7.6.4.1 *Strategy for Cell/Affected Community Consultations*

Due to the number of Cells and Affected Communities and to save repetition, reference is made below only to Affected Communities, but this should be understood as meaning both Cells and Affected Communities, and their geographic spread. Consultations were undertaken only after three key activities were implemented: preparing a mechanism for consulting the geographically dispersed Affected Communities; prior disclosure of information; and notification of local governments, especially Cell leaders.

For other ESIA reports, a strategy of clustering Affected Communities was implemented successfully, so a similar approach was chosen for this ESIA Report. Once the Affected Communities were identified an analysis was undertaken, to determine the feasibility of clustering, focusing on:

- Location in terms of Project components;
- Population size; and
- Previous involvement in consultations on the development of an airport on the current proposed airport site area.

Based on these criteria, all Affected Communities were allocated to clusters 'centred' on one Affected Community where it was considered feasible to organise a meeting and to which access was considered likely to be relatively easy for all those to be invited. In total, 12 consultation meetings with Affected Community representatives were organised (Table7-3). Figure 7-3 shows a clustered community meeting held in the office of Rilima Sector.





**Figure 7-3: Community Consultations at Rilima Sector Office on 18/09/2017**

**Table 7-3: District/Sector/Cell/Village/Affected Community Clustered Meetings**

Host Village	Attending village(s)	Cell	Sector	District	Location of meeting	Proposed Project component
				Kicukiro	Kicukiro District Office	Expressway
			Gahanga	Kicukiro	Gahanga Sector Office	Expressway
		Murinja	Gahanga	Kicukiro	Murinja Cell Office	Expressway
Nyabigugu	Mugendo, Kwisanga	Murinja	Gahanga	Kicukiro	Murinja Cell Office	Expressway
		Nunga	Gahanga	Kicukiro	Murinja Cell Office	Expressway
				Bugesera	Bugesera District Office	Expressway
			Ntarama	Bugesera	Ntarama Sector Office	Expressway
		Kanzenze	Ntarama	Bugesera	Kanzenze Cell Office	Expressway
Karumuna	Kurugenge, Kabeza	Kanzenze	Ntarama	Bugesera	Kanzenze Cell Office	Expressway
			Mwogo	Bugesera	Mwogo Sector Office	Expressway
		Rurenge	Mwogo	Bugesera	Rurenge Cell Office	Expressway
Rurenge	Kaziramire, Gatoki	Rurenge	Mwogo	Bugesera	Rurenge Cell Office	Expressway
		Bitaha	Mwogo	Bugesera	Rurenge Cell Office	Expressway
Gatwe		Bitaha	Mwogo	Bugesera	Rurenge Cell Office	Expressway
			Juru	Bugesera	Juru Sector Office	Quarry road
		Kabukuba	Juru	Bugesera	Kabukuba Cell Office	Quarry road
Kabukuba	Rushubi, Gikurazo	Kabukuba	Juru	Bugesera	Kabukuba Cell Office	Quarry road
		Rwinume	Juru	Bugesera	Rwinumire Cell Office	Quarry road
Kabeza	Katara, Rwimpyisi, Umwimpunga	Rwinumire	Juru	Bugesera	Rwinumire Cell Office	Quarry road

**Table 7-3: District/Sector/Cell/Village/Affected Community Clustered Meetings**

			Rilima	Bugesera	Rilima Sector Office	Airport Area
		Nyabagendwa	Rilima	Bugesera	Nyabagendwa Cell Office	Airport Area
Nyabagendwa	Murambi, Kamabuye, Karama	Nyabagendwa	Rilima	Bugesera	Nyabagendwa Cell Office	Airport Area
		Kabeza	Rilima	Bugesera	Kabeza Cell Office	Airport Area
Kabeza	Karambi, Karirisi, Biraro	Kabeza	Rilima	Bugesera	Kabeza Cell Office	Airport Area
			Mayange	Bugesera	Mayange Sector Office	Airport Area
		Kibirizi	Mayange	Bugesera	Kibirizi Cell Office	Airport Area
Rwakibirizi	Gacyamo, Karambo, Gahinga	Kibirizi	Mayange	Bugesera	Kibirizi Cell Office	Airport Area
		Gakamba	Mayange	Bugesera	Kibirizi Cell Office	Airport Area
			Nyamata	Bugesera	Nyamata Sector Office	Airport Area
		Murama	Nyamata	Bugesera	Murama Cell Office	Airport Area
Bishweshwe	Mwesa, Rucucu, Gataraga, Kivugiza	Murama	Nyamata	Bugesera	Murama Cell Office	Airport Area
		Kimaranzara	Rilima	Bugesera	Kirimanazara Cell Office	Water Pipeline
Kimaranzara	Gasabo, Byimana, Amizero, Kivumu	Kimaranzara	Rilima	Bugesera	Kirimanazara Cell Office	Water Pipeline
		Ntarama	Rilima	Bugesera	Ntarama Cell Office	Water Pipeline
Gaseke	Gasave, Nyamure	Ntarama	Rilima	Bugesera	Ntarama Cell Office	Water Pipeline

Following a decision to cluster the meetings, several options were considered for organising the clustered consultations:

- Public meetings in each cluster;
- Public meetings followed by focus groups representing key 'livelihood interests' (such as farming) and 'social categories' such as women and vulnerable groups taken from each Affected Community; and
- Non-public meetings with selected representatives, from each clustered or non-clustered Affected Community.

The advantages and disadvantages of these options were considered both in terms of consultation effectiveness and in the context of time/resource constraints. A decision was made to implement a series of non-public meetings with pre-selected and invited individuals who were considered to provide a reasonable representation of Affected Community residents and their likely range of interests. Thus, it was decided that each Affected Community should be represented by a village leader (or nominated alternative if the village leader was unable to attend) and six selected residents. The types of residents recommended were:

- School director or teacher or doctor or nurse;
- Farmer;
- Shop-owner, transport operator (or other resident considered to represent an important Affected Community livelihood activity);
- A young person of 17–22 years (such as a school/college student);
- Vulnerable person such as someone who is disabled/chronically sick or an orphan who is head of a household; and
- Senior or long-standing members of CBOs or local associations.

These 'categories' of residents are generic. It was recognised that not all Affected Communities might have residents that could represent all of the categories (in such cases Affected Communities would select as many as they could from the categories). In addition, it was decided that at least two of the Affected Community residents (taken from the list) should be female, with no upper limit on the number of women from each Affected Community. This guided selection process enables a range of interests and viewpoints to be represented and the explicit criteria for inclusion of women and vulnerable people means that social categories, that may be under-represented at public or more formal meetings, have an equal opportunity to be heard. This aspect is reinforced when the facilitator can encourage them to express a view if they appear to be reticent.

The selection of the individual Affected Community representatives was considered best left to the village leaders. However, a guidance document was prepared and given, in advance of the consultation meetings, to the village leaders to assist them in selecting the appropriate residents to invite to the meetings. The village leaders were briefed and given the guidance document in advance.

The agenda for these meetings was the same as for the Districts and Sectors meetings and each meeting was attended by a senior BAC employee with a similar role as occurred at the local government meetings. A transport allowance was paid to all Affected Community members requested to participate in the clustered meetings.

After each meeting 'Minutes' were prepared recording the details of the meeting (date, time, location) and the participants (for example, name, sex, and job/occupation) as well as the key issues and concerns raised. A summary of issues raised is provided in Table 7-6.

#### 7.6.4.2 *Disclosure of Information*

Two means of disclosing information were used. First, as mentioned above, a leaflet was produced, which presented key basic details (text and maps) about the Proposed Project, the ESIA process and the Grievance Mechanism. BAC's address and telephone number and the name of the BAC Community Liaison Officer (CLO) were included in the Leaflet to provide the opportunity for comments on the Proposed Project to be submitted to BAC at any time not just within the context of the formal consultation events. In total 400 copies of the Leaflet were printed (300 in Kinyarwanda and 100 in English) were printed and distributed. The Leaflets were distributed prior to all meetings (see Technical Appendix 7.2).

Secondly, at the beginning of each consultation meeting there was a presentation of the Proposed Project followed by a session providing an opportunity for attendees to ask clarification questions. This provided a valuable opportunity for those who had not been able to read the Leaflet to gain an understanding of the Proposed Project before contributing to the consultation meeting.

#### 7.6.4.3 *Analysis of Affected Community Participants*

Table 7-4 presents an analysis of participants in all Affected Community meetings. Key points are as follows:

- Two of the Affected Communities (5%) invited to clustered meetings were not represented at the meetings;
- Four Affected Communities were not represented by a village leader;
- In total 295 Affected Community residents attended all meetings with the average attendance being 25 (provisional average attendances by gender are 16 for men and 8 for women) with the smallest meeting attendance being 11 and the highest being 38; and
- Approximately 34% of the participants were women (exceeding the minimal 'requirements' indicated in the selection guidance given to village leaders). Women were represented at all meetings.

Approximately:

- 13% of the participants were classed as "youth/young person";
- 0% of the participants were classed as "unemployed";
- 11% of the participants were classed as "in business";
- 14% of the participants were classed as "farmer";
- 24% of the participants were classed as "in public sector (health / education)"; and
- 34 (12%) of the participants were described as disabled/ sick<sup>3</sup>.

Although two Affected Communities were not represented at the meetings and the numbers attending each meeting varied, as did the identity/characteristics of the participants, it is not believed that this affects adversely the 'representativeness' of the consultation meetings. The non-attendance of certain Affected Communities and variation in attendance between individual Affected Community (in terms of Affected Community 'representatives') is unlikely to have been sufficient to reduce significantly the likelihood that the overall consultation meeting results are robust in terms of presenting a credible account of the main impact issues/concerns for all Affected Community residents.

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<sup>3</sup> The percentages (%) do not add up to 100% as not all participants can be allocated to these categories.

**Table 7-4: Analysis of the Attendees at the Affected Community Consultation Meetings**

<b>Affected community Meetings (Affected Communities =42)</b>	<b>Total Number of Attendees</b>	<b>Total Number of Village Leaders</b>	<b>Male</b>	<b>Female</b>	<b>Affected Communities Not Represented</b>
Murinja Cell (Nyabigugu, Mugendo, Kwisanga)	19	2	16	3	Kwisanga
Rurenge Cell (Rurenge, Gatoki, Kaziramire)	25	3	11	14	
Bitaba Cell (Gatwe)	11	1	10	1	
Kabukuba Cell (Gikurazo, Rushubi, Kabukuba)	25	2	21	4	
Rwinume Cell (Kabeza, Katara, Rwimpyisi, Umwimpunga)	32	4	22	10	
Kimaranzara Cell (Kimaranzara, Gasabo, Byimana, Amizero, Kivumu)	38	4	21	16	
Kanzenze Cell (Karumuna, Kurugenge, Kabeza)	16	1	9	7	
Kibirizi Cell (Rwakibirizi, Gacyamo, Karambo, Gahinga)	30	4	18	12	
Murama Cell (Bishweshwe, Mwesa, Rucucu, Gataraga, Kivugiza)	34	5	26	8	
Nyabagendwa Cell (Nyabagendwa, Murambi, Kamabuye, Karama)	26	4	17	9	
Kabeza Cell (Kabeza, Karambi, Karirisi, Biraro)	21	4	13	7	
Ntarama Cell (Gaseke, Gasave, Nyamure)	18	2	10	8	Gasave
<b>Totals</b>	<b>295</b>	<b>36</b>	<b>194</b>	<b>99</b>	
Average number (people/men/women) present	25	3	16	8	Kwisanga and Gasave
Lowest number of attendees at any one meeting	11	1	9	1	Kwisanga and Gasave

**Table 7-4: Analysis of the Attendees at the Affected Community Consultation Meetings**

<b>Affected community Meetings (Affected Communities =42)</b>	<b>Total Number of Attendees</b>	<b>Total Number of Village Leaders</b>	<b>Male</b>	<b>Female</b>	<b>Affected Communities Not Represented</b>
Highest number of attendees at any one meeting	38	4	26	16	Kwisanga and Gasave

#### 7.6.5 National/International and Local NGOs

Two separate workshops were organised. One was held in Kigali city (20 September 2017/Hill View) for national/international NGOs and one in Nyamata for local-level NGOs (19 September 2017/Palast Rock Hotel). The workshops had a similar agenda to all other meetings. Two representatives of two national/international NGOs attended the Kigali city workshop and five representatives of three local NGOs attended the Nyamata workshop. A summary of the key points, related to Proposed Project impacts and the ESIA scope, was prepared.

### 7.7 Consultation Results

#### Introduction

The results (concerns/impact issues) of all consultations are summarised and presented in a series of tables below. Also, responses are provided, when applicable, to the concerns/impact issues raised. These are responses provided directly to stakeholders, during specific consultation meetings, or by the ESIA team at the end of the ESIA preparation process when it was clear where a concern/impact issue was addressed in the ESIA Report. Thus, these tables provide feedback, indirectly, to the consulted stakeholders. Technical Appendix 7.3 provides two example copies of meeting minutes from these consultations (one for a local government consultation and one for a cell/Affected Community consultation).

#### 7.7.1 National, Regional and Local Government Authorities

Concerns/impact issues raised by national government stakeholders during REMA's review of the Scoping Report were consolidated in REMA's/RDB's Terms of Reference.

The local government shared general concerns with the Affected Communities: these are summarised together with community concerns in Table 7-6. A summary of other concerns/impact issues raised by local governments is presented in Table 7-5.

**Table 7-5: Concerns/Impact Issues Raised by Local Government Stakeholders**

<b>Stake-holders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
Bugesera District	Concerns raised over inability to provide solution concerning previous grievance issues following shift of employees.	BAC has implemented a Grievance Mechanism (see Stakeholder Engagement Plan - Appendix 7.1 to this chapter) and is committed to resolving grievances to the satisfaction of both parties (complainant and BAC).

<b>Table 7-5: Concerns/Impact Issues Raised by Local Government Stakeholders</b>		
<b>Stakeholders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
Kicukiro District	<p>Concerns raised regarding the level of livelihood of population affected by the airport.</p> <p>Questions asked regarding this consultation for ESIA being held seven years after it being drafted in 2010 and monitoring procedures for the assessment.</p>	<p>Potential impacts on livelihood status are assessed in Chapter 18: Socio-Economics).</p> <p>The Draft ESIA (2010) was prepared for the previously proposed airport project. This consultation was undertaken in preparation of this ESIA Report for the Proposed Project.</p>
Gahanga Sector	<p>Sought information on how the population of Gahanga will benefit from the airport.</p> <p>Suggestions made for project to contribute towards paying health insurance to vulnerable people.</p> <p>Questions asked regarding this consultation for ESIA being held seven years after it being drafted in 2010.</p>	<p>Socio-economic benefits to the area surrounding the Proposed Project in general are presented in Chapter 18: Socio-Economics.</p> <p>Noted.</p> <p>See response above.</p>
Juru Sector	<p>Issues raised regarding children and mothers being unattended. Sought solution to avoid sexual abuse scourge, suggested distribution of condoms to population and workers.</p> <p>Concerns raised over road condition behind quarry.</p> <p>Sought information on health services for workers.</p> <p>Issues raised over workers selling fuel illegally.</p>	<p>Community health and safety issues including the threats posed by sexually transmitted diseases are assessed in the section on 'Community Health, Safety and Security' in Chapter 18: Socio-Economics.</p> <p>This section of road is not part of the Proposed Project. Road from Airport Area to quarry will be upgraded.</p> <p>BAC is required, under Rwandan law and Lender standards, to provide a safe and healthy work environment. Further details are provided in the section 'Labour and Working Conditions' in Chapter 18: Socio-Economics.</p> <p>Not addressed in the ESIA Report as this is an illegal act.</p>



<b>Table 7-5: Concerns/Impact Issues Raised by Local Government Stakeholders</b>		
<b>Stakeholders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
Mayange Sector	<p>Sought information on plans to promote tourism in regions around the airport.</p> <p>Issues raised regarding wind caused by cutting bushes and change of landscape from earth working for the airport.</p> <p>Concerns raised regarding migration of people having negative impacts on local community cultures.</p>	<p>Future projects to promote tourism around the airport may be developed by GOR and/or Bugesera District, but these are not part of the Proposed Project.</p> <p>Potential impacts on landscape are assessed in Chapter 15: Landscape and Visual.</p> <p>Potential impacts on Air Quality are assessed in Chapter 10: Air Quality.</p> <p>Potential impacts associated with influx (unplanned in-migration) of people into local communities is assessed in Chapter 18: Socio-Economics.</p>
Mwogo Sector	<p>Concerns raised regarding drop-rate of children schooling due to the airport construction.</p> <p>Concerns raised regarding negative impact on ecosystem.</p>	<p>Rwandan labour laws and Lender standards will be applied. BAC will not hire children aged below 18 years.</p> <p>Potential impacts on ecosystems are assessed in Chapter 11: Biodiversity.</p>
Ntarama Sector	<p>Issues raised regarding children skipping school, child labour and prostitution. Suggestions made for Local Administration to organise awareness-raising campaign.</p> <p>Suggested further road connection development to surrounding region for tourism and to boost and promote the benefits of local population.</p>	<p>See response above. Also, there will be no construction workforce camp and all local workers will live in their current place of residence. Opportunities for an increase in sex working will be limited. Addressed in section on 'Community Health, Safety and Security' in Chapter 18: Socio-Economics</p> <p>Future projects around the airport may be developed by GOR and/or Bugesera District, but these are not part of the Proposed Project.</p>
Nyamata Sector	Sought information on plans to promote tourism in regions around the airport.	See response above.

<b>Table 7-5: Concerns/Impact Issues Raised by Local Government Stakeholders</b>		
<b>Stake-holders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
	<p>Sought information on plans to protect community infrastructure like water pipelines and electric power distribution system from being affected by construction activities.</p> <p>Concerns over ecosystem, species endangered and habitat destroyed from the project.</p> <p>Sought information on the management of waste and mitigation to avoid contamination.</p> <p>Suggestions made regarding insurance for workers.</p>	<p>Potential impacts on community infrastructure and utility services are assessed in the section on 'Infrastructure and Utility Services' in Chapter 18: Socio-Economics.</p> <p>Potential impacts on ecosystems, species and habitats are assessed in Chapter 11: Biodiversity.</p> <p>Details on waste management are provided in Chapter 16: Waste Management.</p> <p>Noted.</p>
Rilima Sector	<p>Concerns raised regarding the lack of means of livelihood as land is taken for construction. Suggestions made to using parts of airport site where work has not yet begun for agriculture.</p> <p>Issues raised regarding cattle being confiscated when on construction ground for grazing.</p> <p>Concerns over water contamination of Lake Kidogo.</p>	<p>Potential impacts on land take and livelihoods are addressed in the sections on 'Land Acquisition and Livelihoods' in Chapter 18: Socio-Economics.</p> <p>Agricultural production and livestock is not permitted in the land area leased to BAC for the airport.</p> <p>Noted: confiscation issue</p> <p>Potential impacts on Lake Kidogo, including potential water contamination, are assessed in both Chapter 12: Water Resources and Chapter 18: Socio-Economics.</p>

#### 7.7.2 Cells/Affected Communities

Following review of all meeting minutes, a synthesis of the issues/concerns raised regarding possible impacts (and related matters) was prepared. Many of the same issues/concerns raised at different meetings, are similar in focus, but are expressed in different ways. The synthesis allows all these to be captured without repetition. Care was taken to avoid omission of any impact issues or concerns. Table 7-6 presents the synthesis of Affected Community impact issues/concerns and the number of Affected Communities in which a topic was mentioned.

There are a limited number of key generic concerns and impact issues raised by representatives of a range of Affected Communities (not in order of importance):

- Land acquisition and compensation arrangements:
  - Compensation issues at level of individual landowners/users
  - Compensation issues at Affected Community for communal assets
  - Legacy issues regarding previous compensation and relationship to negotiations on possible future compensation
  - Potential for intra-village social disputes from compensation payments
- Increased environmental and health risks and compensation:
  - Impacts of heavy construction vehicles on and off roads and effects on residents from possible decline in road network conditions and concern over liability for repair
- Desire to see benefits for villages not just compensation for land take or damage including:
  - Social facilities (for example, schools) support/repair
  - Support for vulnerable people
  - Social support to focus on needs of local residents
  - Impacts on/damage to nearby infrastructure (such as water supply networks) and concern over liability for repair
- Environmental impacts including subsequent potential health effects on people and animals) from:
  - Unplanned incidents such as leaks and likely impacts on local people
  - Air quality changes (mainly from particulates) and impacts on public health
  - Impact of vibration on houses
- Effects on job opportunities and accompanying concern that job allocation is equitable and non-discriminatory in terms of gender and age, but to favour local village residents. Interest is 'spreading' the benefits from jobs and that social status is not a barrier to recruitment
- Concern that local people have not receive responses from job application
- Concern that local people obtain sufficient knowledge on the Proposed Project and wider masterplan by the Government of Rwanda
- Negative social impact from a development of such scale

Table 7-6: Summary of Key Issues Raised by Affected Communities			
Main Impact Issues	Comments on Impacts/Concerns	Raised in (Cell)	Response
<b>Livelihoods</b> (see also 'Land Acquisition and Compensation' below):	The development is positive, helpful and will enhance business in the area. The hotel and businesses as a result of this development can improve lives of people around the airport	Rurenge and Kimaranzara	These impacts are presented in a section on 'Economy, Employment and Livelihoods' in Chapter 18: Socio-Economics
	The development is positive, heard that district will become part of Kigali City which is good as conditions will be better and lifestyle will positively change, especially for future generations	Rwinume	These impacts are presented in a section on 'Economy, Employment and Livelihoods' in Chapter 18: Socio-Economics
	Hopes expressed that there will be spaces available for small businesses in the Special Economic Zone	Murinja	GOR is responsible for managing the development of the Special Economic Zone.
<b>Infrastructure</b> <i>Impact on road conditions of construction traffic</i>	Questions asked about alternative plans to replace roads crossing the airport which are not in use now	Bitaba	This issue is addressed in Chapter 10: Traffic and Transport ('severance' issue) and in Chapter 18: Socio-Economics (section on 'Economy, Employment and Livelihoods').
<i>Road network repair</i>	BAC is asked if there are development plans for other infrastructures and or hotel around the airport other than the building and express way	Kabeza and Kanzenze	Future projects around the airport may be developed by GOR, Bugesera District and private-sector companies, but these projects are not part of the Proposed Project.
<i>Damage to utility infrastructure (for example, water supply pipes) from heavy construction traffic</i>	Desire to know the details of the Expressway and whether it will start from the wetland or 50 m from the wetland	Rurenge	Expressway design details are provided in Chapter 6: Proposed Project Description.
	Concerns raised over access to the other side of the airport construction being blocked, affecting citizens travelling over for health services, schools, markets and agriculture	Kibirizi, Murama, Nyabagendwa, Kabeza and Ntarama	This issue is addressed in Chapter 10: Traffic and Transport and in Chapter 18: Socio-Economics (section on 'Economy, Employment and Livelihoods').

<i>Utility improvement (for example, mains (piped) gas supply) and/or provision</i>	Suggestions made for roads to be constructed and extended to reach areas that are not covered	Nyabagendwa	The Expressway is the only road being proposed as part of the Proposed Project.
	Concerns raised over the management of old infrastructures on the construction site including pipelines and electric line	Kanzenze	There is no old infrastructure on the construction site.
<b>Labour and Working Conditions</b> <i>Selection of workers and allocation of priorities for recruitment (for example, locals, poor people, women)</i>  <i>Potential for job sharing to spread benefits from employment</i>  <i>Type and duration of employment opportunities</i>  <i>Timing and local availability of information on</i>	Interest expressed in advertisement plan for job openings, suggested to be posted on Cell Administrative office	Bitaba and Rurenge	Noted.
	Frustration expressed as jobs are not as available as expected. Question asked if there is any structure for vulnerable or people with disabilities to find jobs (e.g. Vision Umurenge Program)	Bitaba, Kibirizi and Kabeza	It is understood, by BAC, that the number of jobs available to village residents is limited in terms of the numbers that wish to obtain employment. BAC has a target of 80% of jobs for local people, includes 40% for Kigali.  BAC does not allow discrimination on grounds of disability, assuming that a vulnerable/disabled applicant is capable of doing the required work.
	Desire to know the job application process and number of employees planning to be recruited	Kimaranzara, Kanzenze, Nyabagendwa and Kabeza	BAC will disseminate information on the recruitment process locally.
	Question asked if the different categories of poverty will be considered in recruiting (e.g. Ubudehe program)	Rurenge	There is no BAC affirmative action policy regarding people who fall under the official poverty line.
	Concerns raised over child labour	Kanzenze	Rwandan labour laws will be applied. BAC will not hire children aged below 18 years.
	Concerns raised over corruption, having to pay to get a job	Kibirizi and Nyabagendwa	Not addressed in the ESIA Report as this is an illegal act.

<i>application process and job availability</i>	Concerns raised over gender inequality. Women have been refused to be considered for jobs operating machines; employees at airport construction site said they never hire women	Murama and Ntarama	BAC does not discriminate on the grounds of the sex of an applicant during labour recruitment. Contractors and sub-contractors, also, are bound by this requirement (see section on 'Labour and Working Conditions' in Chapter 18: Socio-Economics).
	Desire to know if resettled people and locals have privileges during hiring	Kanzenze, Kibirizi and Murama	BAC applies a target of 80% for hiring local workers (40% for Kigali); but does not have an affirmative action preference for resettled people.
	Frustration expressed as citizens wanting to apply for jobs at the office are told by security guards they do not have access to the construction site camp	Nyabagendwa	Noted. BAC will disseminate information on the recruitment process locally with the aim of recruitment occurring through designated locations and not at the construction site.
<b>Social Assistance</b> <i>Social facilities (for example, schools) support/repair</i>	Suggestions made that vulnerable groups like genocide orphans should not receive cash compensation, worrying they will misuse money for expropriation and be left with no place to live	Kanzenze	Resettlement planning for expropriation of land and other assets in relation to the Expressway will take into account the advantages/disadvantages of paying cash compensation to different types of affected people. The RTDA will lead on this process.
<i>Support for vulnerable people</i>  <i>Social support should focus on needs of local residents</i>	Suggestions made to increase support to population living around the airport as they may be overwhelmed by development activities and may be backed up or restrained by rapid development in the area	Kabeza	Provision of such support is a GOR/Bugesera District responsibility as future development around the airport cannot be controlled by BAC only by GOR/Bugesera District (BAC can recommend, only, that permission to build a structure is not granted, by GOR/Bugesera District, if it poses a safety threat to flights arriving/leaving the airport).
	Suggestions made for plans to be established for vulnerable people who can't easily reach the local administration to get support	Kibirizi	Noted.
<b>Land Acquisition and Compensation</b> <i>Compensation issues at level of</i>	Desire to know the details of compensation procedure and programmed expropriation	Kanzenze and Murama	Details of the compensation procedure for the Expressway will be disclosed to affected people/communities as part of the work to prepare the expropriation planning documents.

<p><i>individual landowners/users</i></p> <p><i>Compensation issues at community level for communal assets</i></p> <p><i>Legacy issues regarding previous compensation and relationship to negotiations on possible future compensation</i></p> <p><i>Potential for intra-village social disputes from compensation payments</i></p>	<p>Question asked if there are further compensation for properties destroyed or damaged by testing and construction. Cases of land destroyed by workers testing, where Expressway will pass and houses damaged by engineers from airport</p>	<p>Bitaba and Kabukuba</p>	<p>A community Grievance Mechanism (GM) is in place (see Technical Appendix 7.1: Stakeholder Engagement Plan) and grievances will be submitted to BAC and managed via the GM. If a grievance is accepted as valid then BAC will propose an action, to the complainant, to remedy and/or resolve the grievance.</p>
	<p>Issues of electricity channel, flooding from rain and erosion due to earthwork from airport damaging locals' crops raised. Suggestions made to dig dams around the construction site and ask for further measures</p>	<p>Rwinume, Murama and Murinja</p>	<p>Potential impact upon flood risk to watercourses and downstream receptors is assessed in Chapter 12: Water Resources.</p>
	<p>Question asked if citizens will be further expropriated as construction of houses by local citizens have been suspended or does the master plan for community infrastructure design include individual plots</p>	<p>Kibirizi and Nyabagendwa</p>	<p>Expropriation for the Airport Area has been completed. Expropriation will be required for the Expressway.</p> <p>BAC is not aware of the contents of the 'master plan for community infrastructure'. Concerned people should address their concerns to local government.</p>
	<p>Desire to know who is responsible for any damage that occur during the 25 years the airport is operational under BAC</p>	<p>Murama</p>	<p>The airport will be operated by BAC and it will be responsible for any damages that occur, if the damage is due to BAC operation at the airport.</p>
	<p>Raised concerns over cases of people expropriated, but not compensated for their land and cases where people are expropriated but compensation offered not enough for them to resettle in the same region</p>	<p>Kabeza</p>	<p>This concern is outside the scope the ESIA Report. BAC is considering undertaking related work to determine the results of the expropriation of land and assets for the airport and whether any remedial measures are required.</p>
	<p>Concerns raised over boundary fixed during determination of land for expropriation not being respected</p>	<p>Ntarama</p>	<p>The expropriation process will be in accordance with Rwandan law and Lender standards and the results/outcomes will be monitored and audited in accordance with Lender standards. These controls cannot eliminate all potential problems and mistakes, but should reduce their occurrence to the absolute minimum.</p>

	Suggestions made for citizens to be compensated in a short time in order to be able to resettle nearby in the same area before prices of land goes up	Kanzenze	People affected by expropriation will be consulted during the expropriation planning process. If this concern is raised it will be addressed in the planning process.
<b>Biodiversity Conservation and Sustainable Natural Resource Management</b>	Concerns raised over scarcity of food because hired workers have accommodated in and overcrowded their village	Kimaranzara	Food security is assessed in section on 'Economy, Employment and Livelihoods' in Chapter 18: Socio-Economics.
	Interest expressed in plans to improve conditions of wetlands so community can use it for agriculture	Murama	Noted. The Nyabarongo Wetland Important Bird Area is protected and should not be used for agriculture.
	Interest expressed if local companies specialised in environmental management can have contract with BAC to build green spaces at the airport	Nyabagendwa	Landscaping activities will be undertaken towards the end of the construction period for the first phase of the airport and periodically thereafter. BAC will implement a policy to maximise procurement of goods and services from local companies/businesses (see section on Economy, Employment and Livelihoods; in Chapter 18: Socio-Economics).
	Concerns raised over existing problem of lack of clean water and asked for mitigation plans if water pipelines are blocked due to construction of the airport	Rwinume	Issues/concerns regarding existing lack of clean water should be raised with WASAC.  Potential impacts on infrastructure and utility services are assessed in the section addressing this topic in Chapter 18: Socio-Economics.
<b>Pollution Prevention and Abatement</b> <i>Unplanned incidents such as leaks and</i>	Concerns raised over noise, dust and vibration caused during both construction and operation and their impact on public health. Questions asked about mitigations and relocation plans	Bitaba, Kabukuba, Kibirizi, Nyabagendwa and Murinja	Potential impacts due to noise, dust and vibration are assessed in Chapter 9: Air Quality; Chapter 10: Noise and Vibration and Chapter 18: Socio-Economics. Appropriate mitigation measures are outlined in these chapters.



<p><i>likely impacts on local people</i></p> <p><i>Air quality changes (mainly from particulates) and impacts on public health</i></p> <p><i>Impact of vibration on houses</i></p> <p><i>Impacts of radiation and public health</i></p>	<p>Concerns raised over houses destroyed by vibration caused by heavy machines work at the airport</p>	<p>Murama</p>	<p>Potential impacts due to vibration are assessed in Chapter 10: Noise and Vibration (where it is concluded that there will be no significant impact on dwellings due to vibration).</p>
<p><b>Community Health, Safety and Security</b></p> <p><i>Unplanned incidents and increased exposure to health and safety risks.</i></p> <p><i>Some villages are more exposed to these risks than others and should be compensated</i></p>	<p>Concerns raised over speed of traffic and cars crossing market place and their implication on accidents</p>	<p>Rwinume and Murama</p>	<p>The risk of increased accidents is assessed in Chapter 8: Traffic and Transport and Chapter 18: Socio-Economics.</p>
	<p>Concerns raised over security as there is a lack of identifications on workers</p>	<p>Bitaba</p>	<p>Workers are required to wear identification.</p>
	<p>Interest expressed in working together to resolve problems occurring at construction site, especially theft which should be resolved with collaboration of local community</p>	<p>Nyabagendwa</p>	<p>Noted. Engagement of local communities will continue during construction and will extend into the first operations phase of the airport and beyond.</p>
	<p>Desire to know plans of warning local people about construction activities for safety issues</p>	<p>Kibirizi</p>	<p>BAC will disseminate information to local communities regarding any proposed activities that pose a threat to community health, safety and security.</p> <p>Security measures will be in place inside the construction site. Only authorised personnel are allowed within the construction site.</p> <p>See section on 'Community, Health, Safety and Security' in Chapter 18: Socio-Economics.</p>

<b>Cultural Heritage</b>	Question asked on procedures following discovery of genocide victims during excavation	Murama	See Chapter 14: Archaeology and Cultural Heritage. In the event that unknown graves or human remains are found within the Proposed Project Area, work will stop and these finds will be reported. Relocation of the graves/human remains will be done in consultation with the Institute of National Museums (INMR) and Affected Community, and all the ritual requirements for the relocation will be followed.
<b>Information Disclosure and Stakeholder Engagement</b>  <i>Need for direct communication link between Affected Communities and BAC</i>  <i>More information on Proposed Project key design characteristic desired (for example, width of Expressway corridor, start dates, duration of works in specific areas etc.)</i>	Desire to know when citizens will be informed about land to be used for road construction	Kanzenze	Local people will be informed of the land plots and other assets to be affected by land acquisition and construction activities-once the design of the Expressway is finalised and work to prepare the plan to manage the expropriation process has begun.
	Questions asked on the communication procedure to get information on complaints and grievance resolution results across to all parties concerned	Kanzenze	The Grievance Mechanism has been disseminated to local communities and is in place (See the Stakeholder Engagement Plan which is Appendix 7.1 to this chapter).  Desire to have a wide disclosure of information on the operation of the Grievance Mechanism is noted.
	Interest expressed over details of airport Master Plan	Kibirizi	Disclosure of the airport Master Plan will be managed by Bugesera District and GOR.
	Suggestions made to have multiple contacts to report a complaint and grievances in case one might not be reachable or open an office that handles complaints	Kabeza	BAC will place 'grievance' boxes in selected publicly accessible locations in local communities. These will supplement the current BAC email/cell 'phone contact channel.
	Interest expressed in the grievance procedure but wonder if it is replacing the existing ones used through existing local channels	Kimaranzara	The Grievance Mechanism has been disseminated to local communities and is in place (See the Stakeholder Engagement Plan which is Appendix 7.1 to this chapter). Grievances related to BAC actions must be submitted to BAC via the appropriate channels.

### 7.7.3 National and International NGOs

A summary of the impact issues/concerns raised National and International workshop is provided in Table 7-7. Only the Association pour la Conservation de la Nature au Rwanda (ACNR) and PPTI attended the workshop.

<b>Table 7-7: Summary of Concerns/Impact Issues Raised by National/International NGOs</b>		
<b>Stakeholders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
Association pour la Conservation de la Nature au Rwanda (ACNR)	Desire to know the connection between Proposed Project and Environmental and Social Impact Assessment.	The requirement for the ESIA Report and its process is detailed in Chapter 3: Impact Assessment Methodology.
PPTI	Questions asked about details of the Expressway.  Interest expressed in building green spaces in the Airport Area.	Design details of the Expressway are provided in Chapter 6: Proposed Project Description. Impacts of the Expressway have been assessed throughout the ESIA Report.  Noted.

### 7.7.4 Local NGOs

A summary of the impact issues/concerns raised at the Local NGO workshop is provided in Table 7-8. Only Right Hand for Children, GWIZINEZA and COFORWA attended the workshop.

<b>Table 7-8: Summary of Concerns/Impact Issues Raised by Local NGOs</b>		
<b>Stakeholders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
Right Hand for Children (RHC)	Concerns raised over child labour and corruption.  Desire to know if there is budget for collaboration between BAC and local NGOs and to be linked to donors as both are working for the betterment of the entire population.	Rwandan labour laws and Lender standards will be applied. BAC will not hire children aged below 18 years.  Noted. At present, BAC's budget is for the implementation of the Proposed Project and future investments are being considered.
GWIZINEZA	Suggestions made to have an office where people can direct queries and complaints.  Concerns raised over negative impact of the airport services and that BAC only cares about the construction of the airport	The BAC Grievance Mechanism is in place (See the Stakeholder Engagement Plan which is Appendix 7.1 to this chapter).  Potential impacts associated with influx (unplanned in-

<b>Table 7-8: Summary of Concerns/Impact Issues Raised by Local NGOs</b>		
<b>Stakeholders</b>	<b>Concerns/Impact Issues</b>	<b>Response</b>
	<p>and not lives of the population in general. Questions asked on mechanisms overcoming negative impact from migration of population.</p> <p>Questions asked regarding BAC's plan to empower vulnerable people.</p>	<p>migration) of people into local communities is assessed in Chapter 18: Socio-Economics.</p> <p>Vulnerable people were included in the stakeholder engagement events and they have been considered in the assessment of certain types impacts that will disproportionately affect them.</p>
COFORWA	Suggestions made to have multiple contact and way of communication between the project and population in case one is away or in accessible.	BAC will prepare an updated version of the Stakeholder Engagement Plan focusing on engagement during the construction phase,

During the ESIA process attention was paid to stakeholder concerns as expressed during the series of consultation meetings. Key Proposed Project design and location decisions were made after taking account of such concerns. To the extent practical, and without prejudicing the safe and efficient operation of the Proposed Project, changes were made to avoid, prevent and/or reduce adverse impacts. For example, routing of the Expressway to avoid relocation of people.

In addition, certain impact mitigation commitments were devised, and included in a series of environmental and social management plans, to achieve the same objectives. Examples of mitigation commitments designed to deal, specifically, with stakeholder concerns are as follows:

- Infrastructure damage: there are several commitments relating to avoiding damage and, to repair, should any damage occur;
- Employment opportunities: there is a presumption in favour of employing local people if the required skills are available. Targets for local recruitment will be set and local recruitment will be monitored regularly to ensure that this commitment is met; and
- Pollution: there will be commitments applied to suppressing dust and lowering noise to acceptable levels. Air pollutants will be monitored to ensure that the commitments are being applied and achieving their objectives.

## 7.8 Consultations on the ESIA Report

The ESIA Report disclosure consultations will be implemented in accordance with Rwandan law, as described in Section 7.3.1, and will involve public hearings, in different locations, led by REMA (the number and location of these public hearings is not known at present). BAC will participate in all public hearings. At this stage, local governments also play an important role in organising and communicating public comments, obtained separate from the public hearings, to REMA. In addition, and in accordance with good international industry practice, engagement will also occur with Affected Communities. The consultation results will be an important input into the deliberations of the REMA Technical Committee (this Committee provides a recommendation on a proposed project/ESIA Report to the REMA Executive Committee).

For the engagement process to be effective and meaningful, a range of approaches will be applied, which will be tailored specifically to the identified stakeholders. For Affected Community stakeholders, the format of each engagement activity (whether focus group discussions or public meetings) will meet general requirements on accessibility; that is the engagement events will be held at venues that can be easily accessed by community members, do not incur financial costs, and are culturally appropriate. The overall planning of engagement activities will also be based on the principle of inclusiveness, by ensuring mechanisms for engaging specific social categories (for example, women and men; young people and the elderly/retired) and vulnerable people. If necessary, assistance may be provided to enable vulnerable people to attend meetings.

Engagement will be based on the following key principles of good practice:

- Timeliness to consider key issues and provide input to BAC decisions;
- Dissemination of information in readily understandable formats and using culturally appropriate techniques, in advance of engagement events/meetings, to ensure that stakeholders are informed;
- Gender-inclusivity (for meetings/events, where it is feasible to do so, setting a target of 50% participation by both men and women respectively at each event);
- Free from manipulation and coercion; and
- Use of documentation to keep track of who has been consulted and the key issues raised with feedback to stakeholders at key stages in the ESIA update process.

The ESIA Report (and associated documents) will be issued in English. The Non-Technical Summary (NTS) will be issued in Kinyarwanda and English.

There will be a further disclosure of the ESIA for the 60-day period prior to International Financial Institutions considering investing in the Proposed Project presenting the proposals to their boards.

#### 7.8.1 Information Disclosure

To assist effective disclosure, and subsequent consultations, BAC will ensure that:

- The ESIA Report is comprehensive and provides a fair reflection of the beneficial and adverse impacts of the Proposed Project;
- The ESIA Report, and any associated documents, are provided in English (and the NTS will be issued in Kinyarwanda and English);
- The NTS and a mechanism of providing feedback (to allow comments to be submitted to BAC) will be made freely available in the Affected Communities; and
- The stakeholders will be informed of the publication of the ESIA Report and will be advised about how they can access a copy and obtain copies of the NTS. They will be allowed adequate time, within limits defined by Rwandan law, in which to reflect on the proposals and formulate their response.

Prior to disclosure, information about the ESIA process, the availability of the ESIA Report (and any associated documents) and the consultation process will be publicised through the following media outlets and other mechanisms:

- Radio and local newspapers with a circulation focused on Bugesera District;
- BAC email databases;
- Local Government and Community (Village) noticeboards; and

- Public information displays at selected venues close to the main centres of project activities.

The media notifications will include the following information:

- The name, aims and place of the Proposed Project;
- The address, where stakeholders can obtain/read the ESIA Report and related documentation, as well as the name and address to which written comments must be sent
- The deadline for submitting comments; and
- The time and venue of public meetings.

Information disclosure approaches will depend on the expected type of consultation meetings. It is expected that most meetings will be public meetings; however, some focus group meetings may occur. Timing of disclosure depended on the document being disclosed and the type of consultation event; and disclosure actions were implemented in accordance with disclosure periods presented in the SEP. Details of information disclosure from these two types of meetings is presented below:

**Public meetings:** The ESIA Report (including the EMMP), the ESIA Report NTS, PPT presentations, and leaflet will be made available. The ESIA Report NTS and leaflet will be available in English and Kinyarwanda. The ESIA Report will be available in English only. Information will be displayed at different public buildings in the locality of a public hearing. Leaflets will be available in selected public buildings/locations for members of the public to consult/take away (maximum of two leaflets per person to be taken away); and

**Focus group and other types of non-public meetings:** Leaflet and PPT slide presentation. Leaflets will be available in Kinyarwanda and English versions and the appropriate versions will be distributed according to stakeholder type and needs. PPT presentations will be made at the beginning of meetings. Each meeting agenda will have time allocated to clarifications and questions focused on the Proposed Project and the ESIA Report; and

In addition, the BAC website will provide up-to-date Proposed Project information (<http://en.mota-engil.pt/>). It will also be possible for users to provide feedback or ask questions about the Proposed Project and the ESIA Report via email and the website.

The ESIA Report (and accompanying documents) will be made available at certain key public locations to allow stakeholders to review it and provide feedback. Such locations will include national and local government offices, key central and publicly available locations in selected Affected Communities (selected, partly, for ease of access for all such communities) and offices of NGOs that participated in the ESIA consultations. Final locations will be determined prior to the disclosure period.

Finally, the ESIA Report, the NTS and other accompanying documents will be posted on the BAC website.

#### 7.8.2 Disclosure Consultations

These consultations will be based, primarily, on a series of public meetings that REMA plans to organise in Kigali city and at other key locations near the Proposed Project locations. Final locations will be determined prior to the disclosure period.

Timing of public notifications via the media and the announced meetings will comply with Rwandan law/procedures. The times (such as afternoon or evening) of these meetings will be selected to assist attendance by members of the public.

Within 10 working days of the date of each meeting, BAC will prepare a summary of all written or oral comments received at the meeting. BAC will consider these comments, along with

additional comments received via other consultation mechanisms, and assess whether it is necessary to amend the ESIA Report.

## **7.9 Post-ESIA Consultations and Stakeholder Engagement**

During certain consultations, advice and guidance was obtained on the principles that should apply to the design and implementation of consultation procedures for the post-ESIA Report phase, assuming the Proposed Project were to be approved. The suggestions provided by stakeholders will be used as a basis for formulating recommendations for a post-ESIA Report framework for information disclosure and consultations with key stakeholders, especially Affected Communities and local governments.

### **7.10 Evaluation of SEP Implementation**

A series of key performance indicators for engagement activities for each of the two ESIA stages is presented in Table 7-9.

**Table 7-9: Key Performance Indicators**

<b>ESIA stages and activities</b>	<b>Purpose</b>	<b>Key performance indicators</b>	<b>Outcomes</b>
<p>1. Terms of Reference: Defining the ESIA Report 'scope/contents'</p> <p>AND</p> <p>2. The ESIA Report and ESMP disclosure.</p>	<p>Inclusive consultation and active involvement of comprehensive and representative selection stakeholders leading to identification of impact issues and clear guidance on the ESIA Report 'scope/contents'.</p>	<p>Actual against intended number of consultation events/meetings held.</p> <p>Attendance record for BAC representative(s).</p> <p>As appropriate: Key stakeholders, with at least 50% women, have received and understand the information disclosed; Key stakeholders, with at least 50% women, know where meetings are held and can attend the meetings/events; Checked: 1) by a question to all meeting/event participants and 2) by reviewing all meetings/events attendance records; Copies of disclosure materials are made available at specified times and locations and in the intended number and formats; Number and percentage of all meeting/ event records submitted and filed; and Number of concerns/complaints about non-receipt of materials or lack of time for commenting received.</p>	<p>After a revision of the approach to the Affected community/local government consultations, 12 clustered meetings were planned and 12 were held. Two NGO meetings were planned and held. A BAC representative attended each consultation meeting.</p> <p>34% of all consultation meeting participants were women.</p> <p>Most participants knew about the date location of meetings at least 1 to 3 days in advance.</p> <p>Almost all participants had received and read the Leaflet in advance of meetings.</p> <p>Minutes of all Meetings and attendance records for each meeting are on file.</p>