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NEW BUGESERA INTERNATIONAL AIRPORT: ESIA PHASE STAKEHOLDER ENGAGEMENT PLAN

NEW BUGESERA INTERNATIONAL AIRPORT: ESIA PHASE STAKEHOLDER ENGAGEMENT PLAN

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ACRONYMS AND ABBREVIATIONS

| | |
|-----------------|---|
| AoI | Area of Influence |
| BAC | Bugesera Airport Company Limited |
| CBO | Community-Based Organisation (residents-led organisation focusing on local issues/community interests in one or more communities and based in one of the communities) |
| CLO | Community Liaison Officer |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMP | Environmental Management Plan |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| GRC | Grievance Review Committee |
| ICP | Informed Consultation and Participation |
| IFC | International Finance Corporation |
| IFC PSs | International Finance Corporation's Performance Standards (1-8) |
| KGL | Kigali International Airport |
| Km | Kilometres |
| M | Metres |
| m ³ | Cubic metres |
| MININFRA | Ministry of Infrastructure |
| MINIRENA | Ministry of Natural Resources |
| Mota-Engil | Mota-Engil Engenharia e Construção |
| NEWPLAN | NEWPLAN Consulting Engineers & Planners |
| NGO | Non-Governmental Organisation |
| NTS | Non-Technical Summary |
| PAP | Project-Affected Person |
| PPT | PowerPoint |
| PS | Performance Standard |
| Ramboll Environ | Ramboll Environ UK Limited |
| RAP | Resettlement Action Plan |
| RBA | Rwanda Broadcasting Agency |
| RCAA | Rwanda Civil Aviation Authority |
| REMA | Rwanda Environment Management Authority |
| RLMUA | Rwanda Land Management and Use Authority |
| RTDA | Rwanda Transport Development Agency |
| SEP | Stakeholder Engagement Plan |
| SPIU | Single Project Implementation Unit (Ministry of Infrastructure) |
| ToR | Terms of Reference |
| WBG | World Bank Group |

1. INTRODUCTION

The Bugesera Airport Company Limited (BAC or “the Company”) intends to develop a new international airport within the Bugesera District in the Eastern Province of Rwanda. The development of the proposed New Bugesera International Airport (“Proposed Project”) was influenced by the decision that the existing Kigali International Airport is unable to support the air travel needs of Rwanda soon due to the rapid economic development within the country.

BAC is a joint venture between Mota-Engil Engenharia e Construção (Mota-Engil) and the Government of Rwanda. The Proposed Project will be financed by BAC as well as International Lenders.

In May 2017, Ramboll Environ UK Limited (Ramboll Environ) was commissioned by BAC to undertake a gap analysis of the available environmental and social documentation¹, compiled for a previously proposed project in 2010 by TPS and GIBB Africa, against Rwandan regulatory requirements regarding certain international standards and guidelines. In terms of environmental and social issues, the key requirements applied to the previously proposed project and the Draft Environmental and Social Impact Assessment (ESIA) Report (2010) were those enshrined in the Organic Law determining the modalities of protection, conservation and promotion of environment in Rwanda (N° 04/2005 of 08/04/2005), in particular the implementing Environmental Impact Assessment (EIA) procedure, 2008 (Ministerial Order N° 003/2008 Of 15/08/2008 ‘Relating to the Requirements and Procedure for Environmental Impact Assessment’; and the EIA Guidelines, 2006 (General Guidelines and Procedure for Environmental Impact Assessment).

The Draft ESIA Report (2010) states that it was also guided by the World Bank’s requirements for infrastructure projects and the World Bank Group’s (WBG) General Environmental, Health and Safety (EHS) Guidelines which focus on cross-cutting environmental, health, and safety issues applicable to all industry sectors. It appears, also, that the Draft ESIA Report (2010) took cognisance of the World Bank’s Safeguard Policies, such as those relating to natural habitats and involuntary resettlement².

Ramboll Environ was commissioned, also, to undertake selected updated baseline surveys and produce a new ESIA report, based on the Draft ESIA Report (2010) to comply with national laws and international requirements. For the Proposed Project these are:

- The International Finance Corporation (IFC) Performance Standards (PSs) on Environmental and Social Sustainability (2012);
- WBG General EHS Guidelines (2007);
- WBG EHS Guideline for Airports (2007);
- The World Bank Safeguarding Policies (on environmental and social issues);
- The Equator Principles III; and
- The African Development Bank Group Integrated Safeguards System (2013).

This Stakeholder Engagement Plan (SEP) describes BAC’s approach to interacting with stakeholders (including information disclosure and consultations) as part of the ESIA process for the Proposed Project. Engagement with stakeholders is an ongoing process, which applies to the entire life-cycle of a project. This SEP is a working document which will be revised, as necessary, during the ESIA process and then amended for the construction and operation phases of the Proposed Project.

¹ Draft Environmental and Social Impact Assessment, 2010 and the Draft Resettlement Action Plan (Volumes 1 and 2), 2010

² These safeguarding policies are mentioned in section 2.4.3 of the ESIA Report (2010), but it is not clear from the accompanying text whether the ESIA Report is aligned with these policies.

The SEP includes commitments for providing timely, understandable (in language and format) and appropriate information to stakeholders to ensure that these stakeholders can express their views and make comments on both the Proposed Project and the new ESIA Report, and that these comments are taken into account in the project design and the new ESIA Report preparation. It also ensures that a culturally appropriate means of providing information and undertaking consultations is in place with due emphasis on vulnerable people.

This SEP has been prepared in accordance with the indicative structure/contents for a SEP provided in Annex B of Guidance Note 1, which supports the application of IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts (see section 3.2 below).

2. PROJECT DESCRIPTION AND AREA OF INFLUENCE

2.1 Background

The Proposed Project is to be situated within the Bugesera District in the Eastern Province of Rwanda. The purpose of the Proposed Project is to replace the existing Kigali International Airport for civilian passenger traffic. This airport will remain operational for military purposes. The Proposed Project will be constructed in five phases, the first of which is due to be finalised by 2019/2020. The final phase is due to be completed in 2045.

2.2 Project Description

The Proposed Project is separated into various components and areas, as defined below: designated airport area with a range of facilities and infrastructure, expressway to improve access between the airport and Kigali, upgraded quarry access road, and water abstraction facility on a shore of Lake Kidogo with water supply pipeline to a water treatment plant in the designated airport site. Refer to Figure 2-1 for an illustration of the location of the Proposed Project components.

2.2.1 Designated Airport Area

The designated airport area is approximately 25 km². The design of the airport has been amended since the compilation of the Draft ESIA (2010) Report. In summary, the current Proposed Project will include the following key elements when operational:

- A runway (3,750 m in length by 45 m in width) and one parallel taxiway to improve runway capacity and airside operations;
- Passenger terminal (29,900 m²) designed to International Air Transport Association requirements which includes check-in counters, security check-points, gates, boarding bridges as well as immigration and emigration counters;
- Approximately 4,700 m² of the terminal will be reserved for commercial activities (retail, lounges, offices, etc.); and
- Additional facilities, including:
 - Presidential terminal;
 - Cargo area;
 - Ground service equipment maintenance building;
 - Catering area;
 - Administrative area;
 - Access security;
 - Power distribution;
 - Waste management yard;
 - Fuel farm;
 - Aircraft rescue and firefighting building;
 - Air traffic control tower; and
 - Car parking.

Construction Phase

This phase will require the construction of a temporary construction camp³, storage/laydown areas, a temporary water supply and a water treatment plant. The camp and water treatment plant will be located within the designated airport area. An asphalt plant will be required, which

³ Accommodation will not be provided in this construction camp.

will be constructed in the north-western section of the designated airport area. There is no requirement for worker accommodation on site. A small number of foreign nationals will be housed temporarily off-site in a lodge resort complex.

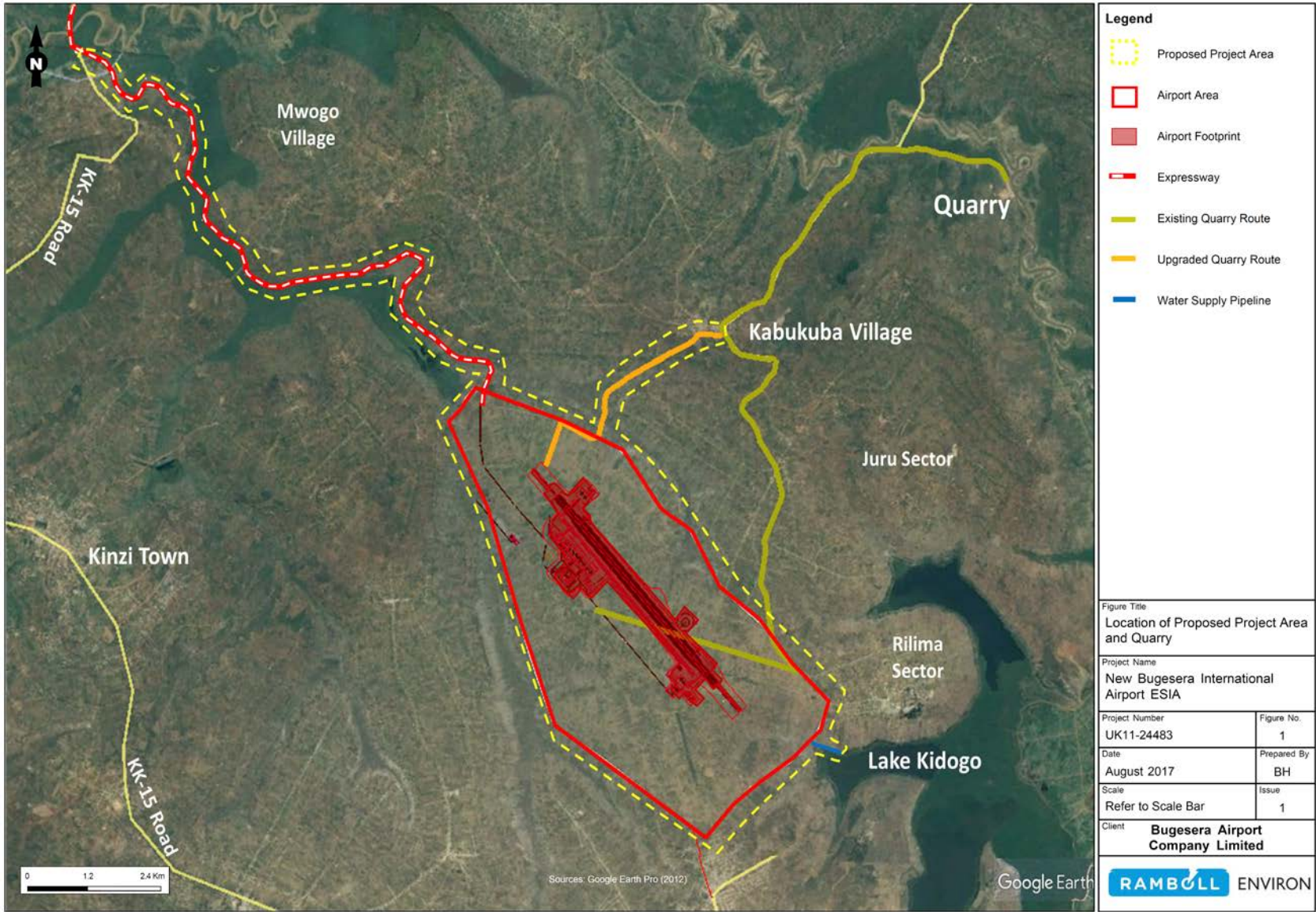


Figure 2-1: Location of the Proposed Project Area and Quarry

2.2.2 Expressway

BAC proposes to construct a new access road (the Expressway) of approximately 16 km. The Expressway will connect the airport to the national KK-15 Road joining at the Nyabarongo Bridge, which crosses the Akagera River. The Expressway will initially comprise two bitumen-surfaced lanes (one in each direction) and later will be extended to four lanes (two in each direction), with a final width of approximately 60 m. The Expressway will be constructed in an area that is currently sparsely populated. The main land use of the proposed route is agriculture with some nearby inhabited areas. Wetlands are also present along the Expressway corridor, which largely follows the floodplain boundary.

2.2.3 Upgraded Quarry Access Road

A quarry is located near the village of Nyamigende, in Juru Cell, to the northeast of the designated airport area and an unsurfaced road of approximately 18 km in length leads to the construction site within the designated airport area. This road passes through Kabukuba village. An alternative route has been identified which has been upgraded (widened and graded) and includes a by-pass for the centre of Kabukuba. Also, this upgraded quarry access road reduces travel times from the quarry, to the airport construction site, as its length has reduced to 10 km (refer to Figure 2-1). The entire route will remain unsurfaced and BAC will be responsible for maintenance.

2.2.4 Water supply

Water for the construction phase will be abstracted from the nearest part of Lake Kidogo and transported to the water treatment plant by a 5 km above-ground pipeline. It is anticipated that approximately 600 m³ of water per day will be required during the construction phase.

2.2.5 Associated Facilities⁴

Quarry

The quarry, near Nyamigende village, is operated by Mota-Engil, which is in receipt of a 'Certificate of Approval of Environmental Impact Assessment' and a 'Quarry Licence' (both issued in the autumn of 2015). The quarry is permitted to be mined at a rate of 30,000 tons of aggregate per month.

The quarry is not considered to be a component the Proposed Project as it has been operating for almost two years and aggregate has been/is being extracted for other projects, not just the airport. Also, it will continue to operate after construction has been completed. In addition, as an Environmental Impact Assessment Report has been prepared, the quarry's impacts have been evaluated and impact management requirements have been imposed. The combined impacts of the Proposed Project and the quarry will be considered, together, in the section on cumulative impacts in the new ESIA Report.

Permanent Electricity and Water Supply

BAC has indicated that separate power and water supplies will be required during the operation phase of the Proposed Project. It is understood that the Government of Rwanda is responsible for this aspect of the Proposed Project and any associated environmental and other approvals. At present, no additional information is available.

2.3 Area of Influence

IFC PS 1: *Assessment and Management of Environmental and Social Risks and Impacts* (2012) requires that a Project's Area of Influence (AoI) is determined based on the following guidance:

⁴ As per the IFC PS1, associated Facilities are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.

“Where the project involves specifically identified physical elements, aspects, and facilities that are likely to generate impacts, environmental and social risks and impacts will be identified in the context of the project’s area of influence. This area of influence encompasses, as appropriate:

- The area likely to be affected by: (i) the project and the client’s activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project; (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities’ livelihoods are dependent.*
- Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.*
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.”*

Based on a review of the Draft ESIA Report (2010), an examination of the current Proposed Project plans and the results of a site visit and consultations with BAC and selected stakeholders (primarily government entities), an initial description of the Proposed Project’s AoI has been prepared. This section will be updated in subsequent versions of the SEP as and when necessary.

The identification of an AoI is based on the locations of the Proposed Project, Associated Facilities and airport-related activities, and the type and location of anticipated impacts. Analysis of these factors indicates that the AoI can be considered as the combination of a series of defined areas (sub-AoIs) nested within a spatial hierarchy (each area being the focus of a specific combination of impact types according to the location and type of project activities), as follows:

- **Rwanda:** is the ‘overall’ AoI as receptors at the national level will be affected by macro-level impacts such as national greenhouse gas emissions and certain social and economic impacts (such as contribution to GDP) of construction and operation of the airport;
- **Certain linear ‘corridors’ within the Eastern, Kigali and Southern Provinces:** These ‘corridors’ constitute a sub-AoI for noise impacts as aircraft taking off and landing will follow designated flight paths and for a limited period they will be flying at relatively low altitudes and thus likely to impact receptors under or near these flight paths. As all flight paths will centre on the airport, which is located in the Eastern Province (but close to the borders with the other two Provinces), and given that the impacts will be most pronounced when/where aircraft are flying at low altitudes, these impacts are expected to be experienced not only, primarily, in the Eastern Province but also in the Kigali and Southern Provinces;
- **Bugesera and Kicukiro Districts:** The Proposed Project is located, almost entirely, in Bugesera District; however a small section of the Expressway (at the northern end) is located in Kicukiro District. Most direct and indirect meso-level impacts will be experienced within Bugesera District as the area of Kicukiro District affected by the Expressway is relatively small; and
- **Rilima, Juru, Mwogo, Ntarama, Nyamata and Mayange Sectors (Bugesera District) and Gahanga Sector (Kicukiro District):** will be a sub-AoI for most of the local-level (or micro-level) construction and operation phase impacts related to the Proposed Project. The designated airport area is located almost entirely in the Rilima Sector and most of the Expressway is in Mwogo Sector. Two other Sectors (Nyamata and Mayange) are located very near the western boundary of the designated airport area (Nyamata, also, is located just to the west of the Expressway)

3. STAKEHOLDER ENGAGEMENT: NATIONAL AND INTERNATIONAL REQUIREMENTS

The stakeholder engagement activities will be conducted in accordance with:

- Rwandan regulatory requirements for preparation of EIA Reports⁵; and
- IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts (and the accompanying Guidance Note 1).

3.1 National Rwandan Requirements

Rwandan practice regarding stakeholder engagement in a development context is exemplified by the provisions of the Rwanda National Human Settlement Policy, 2009. Its requirements on stakeholder engagement are geared to ensuring that affected persons participate during consideration and development of a project and their views are understood before the implementation of a project. These requirements include:

- Development planning shall be integrated, participatory, evidence-based, and focused on addressing the priority needs of citizens, taking into consideration, the overall national development vision;
- Community participation is essential for the improvement of human settlements, meeting needs and priorities, ensuring that beneficiaries agree with the development objectives and cooperate in their implementation, establishing procedures corresponding to resources, capacities and priorities and creating the feeling of accountability among the people; and
- All the economic players (public sector, private sector, Non-Government Organisations (NGOs) and households) are required to take an active part in the planning and establishment of sustainable human settlement.

Rwandan EIA legislation and implementing guidelines⁶ 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 scoping and preparation of the Terms of Reference (ToR) (also referred to as the Scoping Report) by the developer for submission to REMA for review and approval. Stakeholders can also be consulted at other times during the EIA process and, particularly, play a role, in advising, *".... project developers and REMA [Rwanda Environment Management Authority] on approaches to avoid, minimise or compensate for adverse environmental impacts."*

EIA Reports and accompanying Environmental Management Plans (EMP) are submitted to REMA, which is mandated to consult with other government entities (by providing them with copies of the EIA Report and EMP for review and comment). REMA is also responsible 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 ESIA 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. 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.

⁵ 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.

⁶ Rwanda Environment Management Authority (2006) *General Guidelines and Procedure for Environmental Impact Assessment*.

3.2 International Finance Corporation (IFC) Requirements

IFC Performance Standard 1 (PS 1) 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 this 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, always, in a comprehensive, independent and transparent manner.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Stakeholder Identification

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 Project Area that are directly influenced (actually or potentially, positively or adversely) by the Project and/or have been identified as most susceptible to change associated with the 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 Project, or have an interest in the project”.*

To develop an effective SEP, 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 is then 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.

Identifying stakeholders is a continual process. It should be noted that this document focuses on stakeholders who do not have formal relationships with BAC and the Proposed Project and who, thus, may wish to use this document for information and guidance. Mechanisms for engagement with customers, contractors, shareholders and lenders, with which BAC has regular contact during its business, are not addressed in this document.

Stakeholders identified to date, based on previous stakeholder engagement, primarily for the Draft ESIA Report (2010) and the results of a site visit undertaken the week of 15 May 2017 by members of the ESIA team, are categorised and listed below.

4.2 Affected Communities

Affected communities are those communities located within the vicinity of:

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

To assist with the initial identification of these communities, a set of ‘distance’ criteria will be applied to determine the number of Affected Communities. 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 bounded by a:

- 2 km boundary around the boundary of the designated airport area;
- 2 km corridor, based on 1 km either side of the centre-line of the upgraded quarry access 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 supply pipeline right-of-way; and
- 2 km radius based on the water abstraction facility.

Later, distance criteria can be applied to infrastructure (such as overhead transmission lines) and the flight paths when their locations are known.

An indicative list of potentially affected sectors and cells and their associated stakeholder categories is provided in Table 4-1. Specific identifiable settlements/communities will be identified as part of the social baseline work and a schedule for disclosure and consultations will be prepared and then implemented.

| Table 4-1: Indicative List of Affected Sectors and Cells and Stakeholder Categories | |
|---|---|
| Affected Communities | Stakeholder Categories |
| Designated Airport Area: <ul style="list-style-type: none"> • Rilima Sector • Nyabagendwa Cell • Kirimanzara Cell • Karera Cell • Kabeza Cell • Nyamata Sector • Murama Cell • Kayumba Cell • Nyamata Cell • Maranyundo Cell • Kananzi Cell • Mwogo Sector • Rugunga Cell • Kagasa Cell • Rurenge Cell • Bitama Cell • Juru Sector • Kabukuba Cell • Musovu Cell • Rwinume Cell • Juru Cell • Mayange Sector | <ul style="list-style-type: none"> • Settlements/Affected communities' 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 • Youths • Community-Based Organisations • Vulnerable people/households/groups (such as female-headed households; very poor households; disabled/chronically sick people; internally displaced peoples/refugees, and ethnic minorities) • Local service providers (e.g. hotels, restaurants, local shops, transportation providers, etc.) |
| Expressway <ul style="list-style-type: none"> • Mwogo Sector • Nyamata Sector • Gahanga Sector • Ntararama Sector • All affected Cells | |
| Upgraded Quarry Access Road <ul style="list-style-type: none"> • Juru Sector | |
| Construction Phase Water Supply System <ul style="list-style-type: none"> • Rilima Sector | |

4.3 National Government: Regulatory and Executive Institutions

Several stakeholders and government institutions at national level will be consulted by REMA as part of its review of the Scoping Report, submitted by BAC in early August. It is expected that such stakeholders will include, but need not be limited to, the following:

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

Some of these stakeholders were consulted during the site visit undertaken the week of 15 May 2017 by members of the ESIA team (see section 5 below).

4.4 Local Government

Officials from Bugesera District will be consulted, including officials from potentially affected sectors such as Juru, Rilima and Nyamata Sectors. These may include, but not be limited to, all or some of the following:

- Bugesera and other Districts;
 - Mayors;
 - Vice Mayors for Social Affairs;
 - Vice Mayors for Economic Development; and
 - District Environmental Officers;
- Sector Executives (Rilima, Juru, Nyamata, Gashora, Mwogo and Mayange);
 - Managers for Land Management, Infrastructure and Community Settlement; and
 - Managers for Social Affairs;
- Cells (Kimiranzara, Karera and Ntarama plus others as appropriate);
 - Village Chairpersons; and
 - Opinion leaders/Elders.

4.5 Non-Governmental Organisations (NGOs)/Community-Based Organisations (CBOs)

National-level NGOs to be consulted are:

- World Vision;
- ACCORD;
- Aegis Trust;
- Association pour la Conservation de la Nature au Rwanda;

- World Relief;
- Food for the Hungry;
- Education Development Center Inc. (EDC);
- CECI; and
- Plan International Rwanda.

Local-level NGOs/CBOs have been identified and further work will be undertaken to determine local NGOs/CBOs to be consulted. Based on current knowledge NGOs/CBOs to be consulted may include, but need not be limited to, the following:

- Itorero Imanzi;
- Rwanda Girls Initiative;
- Millennium Promise;
- Send A Cow;
- Right to Play;
- Miracle Corners;
- Rafiki Foundation;
- Nibakure Children's Village; and
- Human in Love Rwanda Branch.

4.6 Company/Engineering, Procurement and Construction (EPC) Contractor and Sub-Contractor Workforces

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

4.7 Media

- Rwanda Broadcasting Agency (RBA);
- 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.

Also, both electronic and print media outlets, as well as BAC's and the Engineering, Procurement and Construction (EPC) Contractor's outlet, will be engaged, as appropriate. All the media houses can be used to transmit information but the preferred media outlet will be the RBA. RBA has eight radio stations and a television network that gives it a national coverage including five regional radio stations in different Provinces, which are an effective platform for providing information to the public. Igihe.com Newspapers in Kinyarwanda and the New Times Newspaper in English are important print media outlets.

The above indicative stakeholder list will be reviewed periodically and updated as necessary during the ESIA process to reflect new information and the evolving status of both the new ESIA work and the Proposed Project.

5. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During the preparation of the Draft ESIA Report (2010), stakeholder engagement was undertaken with a range of Affected Communities and other stakeholders, and these engagement actions and the results are presented in the Draft ESIA Report (2010) and are not repeated in this SEP.

During early fact-finding activities as part of this current ESIA work, members of the ESIA team attended several meetings with national and local governmental stakeholders in the week beginning 15 May 2017. The list of meetings is provided in Table 5-1. 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.

Table 5-1: Stakeholder Meetings, May 2017

| Date | Stakeholder | Location | Reason |
|-------------|--|--|--|
| 16 May 2017 | Ministry of Infrastructure | Ministry of Infrastructure offices, Kigali | Meeting to discuss the 2010draft ESIA Report, resettlement activities and the current Proposed Project MasterPlan |
| 17 May 2017 | Rwandan Civil Aviation Authority | Mota-Engil offices in Kigali | Meeting to discuss the 2010 ESIA Report and the current Proposed Project Masterplan and RCAA requirements |
| 17 May 2017 | Bugesera District Deputy Mayor and Sector Leaders from Rilima and Juru | Proposed Project site, Bugesera | Meeting to discuss the Proposed Project Masterplan and stakeholder engagement |
| 18 May 2017 | Rwanda Land Use and Management 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 the new ESIA work |
| 19 May 2017 | Rwanda Development Board/Rwanda Environmental Management Authority | Rwanda Development Board offices, Kigali | Meeting to discuss the 2010 ESIA Report, the current Proposed Project Masterplan and the proposed new ESIA approach, and REMA'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 which will be used in preparation of both the Scoping Report (Terms of Reference) and the new ESIA Report.

6. FUTURE STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 Introduction

Engagement activities during the ESIA update work will occur at two distinct stages:

- Following submission of the Terms of Reference (ToR) to REMA (equivalent to a Scoping Report); and
- New ESIA Report disclosure (following submission of the new ESIA Report and Environmental and Social Management Plan (ESMP) to REMA).

During the first ToR or Scoping stage, engagement will take the form of consultation meetings, with all stakeholder categories focusing on issues/concerns views regarding the likely impacts of the project; particularly with respect to the interests of the stakeholders. To the extent that it is feasible, stakeholders will be encouraged to consider measures that should be taken to avoid or reduce the severity of expected adverse impacts and to enhance positive impacts. The consultation results will be incorporated into the work programme leading to preparation of the new ESIA Report.

The second stage of engagement (new ESIA Report Disclosure) 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 and specific livelihood groups, such as farmers along the Expressway route. 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 Company 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
- 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.

6.2 Information Disclosure

Stakeholder consultation disclosure materials will be prepared in English. The ESIA Report Non-Technical Summary (NTS) will be translated into Kinyarwanda prior to disclosure. Leaflets for consultation events will be prepared in English and translated into Kinyarwanda.

The main mechanisms for information disclosure are presented below by type of stakeholder engagement event:

Meetings with officials: Intended new ESIA work programme and/or PowerPoint (PPT) slide presentation will be made available. These will be used, as appropriate, depending on the stakeholders and the timing of the meetings. Materials will be available in English versions;

Focus group and other types of non-public meetings: Leaflet and PowerPoint slide presentation. Leaflets will be available in Kinyarwanda and English versions and the appropriate versions will be distributed according to stakeholder type and needs. Leaflets will be distributed at least 5 working days prior to meetings. PowerPoint presentations will be made at the beginning of meetings. Each meeting agenda will have time allocated to clarifications and questions focused on the Project and the ESIA process; and

Public meetings: The new ESIA Report (including the ESMP), the new ESIA Report Non-Technical Summary (NTS), PPT presentations, and leaflets will be made available. The ESIA Report NTS and leaflets will be available in English and Kinyarwanda. The new ESIA Report will be available in English only. Information will be displayed at different public buildings in the locality of a public hearing and at least five working days in advance 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) at least five working days in advance of a public hearing.

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

6.3 Information Communication

Communications alerting stakeholders to future stakeholder events/meetings and, also, concerning organisations/logistical aspects of stakeholder events/meetings will be provided by a range of means, but primarily by:

- **Public announcements.** The Company will place announcements in key public locations, such as bulletin boards at local government offices and other public sector buildings;
- **Emails.** The Company will inform stakeholders of project milestones and other current project/ESIA news (it is recognised that stakeholder access to emails will be variable);
- **Media (primarily radio and newspapers) announcements/notices:** These will mostly concern provision of key information about project milestones and certain engagement events/meetings, especially public hearings; and
- **Oral communications:** Community leaders will be requested to inform other community members about stakeholder events/meetings to be organised in their community/locality.

An overview of the planned stakeholder engagement activities with breakdown by stakeholder group is given in Table 6-1 below. This table will be updated during the ESIA process, as necessary.

6.4 ESIA Report Update: Impact Assessment Phase

An overview of the planned stakeholder engagement activities, to occur at an early phase in the work to update the ESIA Report, with a breakdown by stakeholder group is given in Table 6-1. This table will be updated during the ESIA process, as necessary.

| Table 6-1: Impact Assessment Phase: Stakeholder Engagement Methods and Information Disclosure | | | | |
|---|--|--|---|------------------|
| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe [These are indicative times and they may alter] | Disclosure: Material Mechanisms and Timing | Location |
| Local government entities (Districts, Sectors and Cells) | <p>Meetings with officers/elected members of Bugesera and Kicukiro districts will be organised.</p> <p>Also, meetings will be held with the Executive Committees of Rilima, Juru, Mayange, Mwogo, Gashora and other affected sectors. Meetings will also be held at Karera, Ntarama, Kimiranzara, Nyabagendwa, Kabukuba and other project-affected Cells*.</p> <p>*Other sectors and cells will be identified for inclusion in this engagement programme</p> | 4-15 September 2017 | <ul style="list-style-type: none"> PPT presentation (as above), leaflets (including details of the Project, and ESIA update process, and intended stakeholder engagement activities/ Grievance Mechanism). Copies of leaflets (including details of project, ESIA process), in Kinyarwanda (and English if necessary) will be distributed, at least five working days in advance of meetings, to the contact point for all local government entities to be met. PPT presentation by a BAC representative will presented at beginning of meetings with time for clarifications. | To be determined |
| Affected Communities | A range of consultation events will occur as below. The key objective of these events is as indicated for the stakeholders above. | | | |
| | <p>At least four clustered meetings will be held in the following Sectors: Rilima, Juru, Mayange, Mwogo, Gashora</p> <p>Village leaders will be asked to attend and to select a small group of literate village representatives with a maximum number of six representatives: consisting of, to the extent possible, an elder, a medical professional and/or a teacher, a student (age 16 – 18 years), and an entrepreneur/</p> | 4-20 September 2017 | <ul style="list-style-type: none"> Leaflets (including details of project, ESIA update process, intended stakeholder engagement activities/Grievance Mechanism). Leaflets will be provided in Kinyarwanda (and English if necessary) at least five working days before the date of the meetings. A nominated BAC representative will a) liaise with the specific village leaders to ensure selection of | To be determined |

Table 6-1: Impact Assessment Phase: Stakeholder Engagement Methods and Information Disclosure

| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe [These are indicative times and they may alter] | Disclosure: Material Mechanisms and Timing | Location |
|----------------------|--|--|---|------------------|
| | business person. At least two of the group members must be female. | | <p>community representatives and obtain names and b) liaise with the selected representatives to ensure that they have a copy of the leaflet. Also, the representatives will be encouraged to read the leaflet five working days before the meeting of the village 'cluster' which their village will attend.</p> <ul style="list-style-type: none"> The Company representative will leave multiple copies of the leaflet with the village leaders and request that they are made available in public places. Also, the village leader will be asked to request that literate village residents read the leaflet and discuss their issues and concerns with one or more of the selected representatives who will attend the clustered meeting. Each clustered meeting will be attended by a BAC representative who will be available to provide answers to clarification questions. | |
| | To identify vulnerable people/households/ groups (for example, the disabled, chronically sick, female-headed households or households dependent on the elderly, and the very poor – the actual | 4-20 September 2017 | <ul style="list-style-type: none"> Leaflets (including details of project, ESIA update process, intended stakeholder engagement activities/Grievance Mechanism). Leaflets will be provided in | To be determined |

| Table 6-1: Impact Assessment Phase: Stakeholder Engagement Methods and Information Disclosure | | | | |
|--|---|---|---|-----------------|
| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe [These are indicative times and they may alter] | Disclosure: Material Mechanisms and Timing | Location |
| | types of vulnerable people/households will be identified prior to the beginning of stakeholder engagement work), four village leaders (selected randomly from the leaders identified previously) will be asked to identify up to five literate vulnerable people/households per village and then meetings with the vulnerable people/ households will occur in each of the four villages. | | <p>Kinyarwanda (and English if necessary) at least five working days before the date of the meetings.</p> <ul style="list-style-type: none"> The selected individuals will be encouraged to read the leaflet least five working days before the meetings they will attend. Selected members will be requested to discuss the project and its implications, with other vulnerable people/ households before the meetings. Each meeting will be attended by a BAC representative who will be available to provide answers to clarification questions. | |
| International and national NGOs | One workshop for NGOs. The objective of this workshop will be to discuss the intended programme of work and to help identify gaps which may need to be addressed by revision or addition to the investigation programme. | 4-20 September 2017 | <ul style="list-style-type: none"> PPTs, leaflets (including details of project, ESIA process, intended stakeholder engagement activities and the Grievance Mechanism) and summary of investigation programme. PPT presentation (including details of Project, ESIA update work programme, and intended stakeholder engagement activities/Grievance Mechanism). Copies of leaflets (including details of project, ESIA process), in English will be distributed, at least five working | Kigali |

| Table 6-1: Impact Assessment Phase: Stakeholder Engagement Methods and Information Disclosure | | | | |
|--|---|---|--|--------------------------------------|
| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe [These are indicative times and they may alter] | Disclosure: Material Mechanisms and Timing | Location |
| | | | <p>days in advance of the workshop.</p> <ul style="list-style-type: none"> PPT presentation by a BAC representative will occur at beginning of the workshop with time for clarification. | |
| Media | National and local media will be kept informed by press releases and press conferences as to Project/ESIA developments. | Periodic | <ul style="list-style-type: none"> Press releases and press conferences to be issued periodically by BAC. | Kigali |
| Company staff | Staff members will be kept informed regularly and engaged to promote clarity in understanding of the Project and to prevent unrealistic expectations being raised in local communities. Special focus will be given to staff working on the Project and coming into contact with local communities. | Periodic | <ul style="list-style-type: none"> Internal briefing notes and items in BAC Newsletter to be issued by BAC. 'Question/Answer' sheet to be prepared for staff by BAC, coming into contact with local communities, to help ensure that consistent answers are provided to questions raised by local community members. | Kigali, Bugesera and other locations |

6.5 The New ESIA Report and ESMP Disclosure

As it is not known at this stage how many public hearings will occur, nor is the extent of local-level-consultations and how local governments will undertake them known, it is not possible to be prescriptive regarding stakeholder engagement activities. However, good international industry practice regards reliance on public hearings as the main engagement mechanism as being somewhat restrictive and limiting in terms of ensuring an internationally acceptable level of stakeholder input. Therefore, in line with IFC PS 1, an emphasis will be placed on organising meetings with local government entities and Affected Communities.

An indicative schedule for stakeholder engagement actions following disclosure of the new ESIA Report and ESMP is provided in Table 6-2 (focusing on the Affected Community and local government stakeholders consulted earlier).

| Table 6-2: The New ESIA Report and ESMP Disclosure: Stakeholder Engagement Methods and Information Disclosure | | | | |
|---|---|-------------------------------------|--|------------------|
| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe | Disclosure: Material Mechanisms and Timing ⁷ | Location |
| Local government entities (Districts, Sectors and Cells) | <p>Meetings with the Mayor (plus officers/ elected members) of Bugesera and Kicukiro districts will be organised.</p> <p>Meetings will be held with the Executive Committees of Rilima, Juru, Mayange, Mwogo, Gashora and other affected sectors.</p> <p>Meetings will also be held at Karera, Ntarama, Kimiranzara, Nyabagendwa, Kabukuba and other project affected Cells*.</p> <p>* - Other Sectors and Cells may be identified for inclusion in this engagement programme</p> | Dates in September and October 2017 | <ul style="list-style-type: none"> The new ESIA Report and ESMP (District only) – expected to be downloaded and printed locally. They must be available for downloading at least twenty working days before the meeting. NTS of the new ESIA Report (Sectors and Cells only). PPT presentation. Copies of the NTS of the new ESIA Report, in Kinyarwanda (and English if necessary) will be distributed, at least 10 working days in advance of meetings, to the contact point for all local government entities to be met. PPT presentation by a BAC representative will be presented at beginning of meetings with time for clarifications. | To be determined |
| Affected communities | <p>A range of consultation events will occur as follows below.</p> <p>The key objective of these events is as indicated for the stakeholders above.</p> | | | |
| | The villages selected for the first round of engagement will be consulted again. The same groups and the clustered meeting mechanism will be used again. | | <ul style="list-style-type: none"> NTS of the new ESIA Report in Kinyarwanda (and English if necessary) will be distributed, at least 10 working days in advance of meetings, to the contact point for all local government entities to be met. Also, the representatives will be encouraged to read the NTS at least five working days | To be determined |

⁷ The disclosure actions are indicative only. They may change depending on the arrangement to be made by REMA and local government entities after submission of the Updated ESIA Report and ESMP to REMA.

Table 6-2: The New ESIA Report and ESMP Disclosure: Stakeholder Engagement Methods and Information Disclosure

| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe | Disclosure: Material Mechanisms and Timing ⁷ | Location |
|----------------------|--|-----------|---|------------------|
| | | | <p>before the meeting of the village 'cluster' which their village will attend.</p> <ul style="list-style-type: none"> Each meeting will be attended by a BAC representative who will be available to provide answers to clarification questions. | |
| | Meetings with the same 'livelihood' focus groups will be organised | | <ul style="list-style-type: none"> NTS of the new ESIA Report in Kinyarwanda (and English if necessary) will be distributed at least 10 working days in advance of meetings. Also, the representatives will be encouraged to read the Non-Technical Summary five working days before the meetings. Each meeting will be attended by a BAC representative who will be available to provide answers to clarification questions. | To be determined |
| | Meetings with the same four 'vulnerable people/households' focus groups will be organised. | | <ul style="list-style-type: none"> NTS of the new ESIA Report in Kinyarwanda (and English if necessary) will be distributed at least 10 working days in advance of meetings. Also, the representatives will be encouraged to read the NTS five working days before the meeting. Each meeting will be attended by a BAC representative who will be available to provide answers to clarification questions. | To be determined |

| Table 6-2: The New ESIA Report and ESMP Disclosure: Stakeholder Engagement Methods and Information Disclosure | | | | |
|--|---|------------------|---|----------------------------|
| Stakeholder Category | Stakeholder Engagement and Methods | Timeframe | Disclosure: Material Mechanisms and Timing⁷ | Location |
| International and national NGOs | One workshop for NGOs. | | <ul style="list-style-type: none"> The new ESIA Report and ESMP (expected to be downloaded and printed locally). They must be available for downloading at least 20 working days before the workshop. NTS of the new ESIA Report (to be provided if requested at least 15 working days before the workshop). PPT presentation. Copies of the NTS of the new ESIA Report), in Kinyarwanda and English will be distributed, at least 10 working days in advance of the workshop. PPT presentation by a BAC representative will occur at beginning of workshop with time for clarification. | Kigali |
| Media | National and local media will be kept informed by press releases and press conferences as to Project/ESIA developments | Periodic | <ul style="list-style-type: none"> Press releases and press conferences. Invitations to attend public hearings. | Kigali |
| BAC staff | Staff members will be kept informed regularly and engaged to promote clarity in understanding of the project and to prevent unrealistic expectations being raised in local communities. Special focus will be given to staff working on the project and coming into contact with local communities. | Periodic | <ul style="list-style-type: none"> Internal briefing notes and items in BAC Newsletter. 'Question/ Answer' sheet prepared for staff, coming into contact with local communities, to help ensure that consistent answers are provided to questions raised by local community members. | Kigali and other locations |

7. COMMENT MANAGEMENT PROCESS AND GRIEVANCE MECHANISM

7.1 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's PS 1 includes a requirement to expand external communication activities to include a specific Grievance Mechanism.

For the purposes of this 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.

7.2 Comment/Concern Management

Comments/concerns will be conveyed to BAC via the same means as grievances (see section 7.3 below). Once received they will enter into BAC's external communication procedures and feedback will be provided according to the requirements of the procedure. Concerns will be identified and every month concerns will be analysed and a report provided to the appropriate senior manager. This will alert managers to concerns, for example on vehicle speeds, that may be increasing in number and 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.

7.3 Grievance Mechanism

This section presents a transparent procedure that BAC will employ to manage grievances received from external stakeholders such as Affected Communities and NGOs. For internal stakeholders (primarily onsite workers), a separate workers' Grievance Mechanism will be established and will be operated by BAC's Human Resources Department. This workers' Grievance Mechanism will apply, also, to 'core business' contractors who will be expected to adopt it or to demonstrate that their existing workers' Grievance Mechanism is substantively similar to that operated by BAC. Contractors will be expected to report regularly to BAC on the operation of their workers' Grievance Mechanisms.

Grievance Mechanisms are increasingly important for projects where on-going risks or adverse impacts are anticipated. They serve to prevent and address individual and community grievances, reduce risk, manage expectations and assist larger processes that create positive social change. Grievances may take the form of specific complaints about impacts, damage or harm considered to have been caused by the Proposed Project, and about access to the Project stakeholder engagement process.

This Grievance Mechanism has been developed with the following aims:

- To build and maintain trust with all stakeholders;
- To prevent adverse consequences of failure to adequately address grievances; and
- To help identify and manage stakeholder concerns and thus support effective risk management.

7.4 Grievance Mechanism Structure and Key Principles

The Grievance Mechanism, developed for the Proposed Project (and to be applicable during the current ESIA process) 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. Each record will contain:
 - The name of the individual or organisation;
 - The date and nature of the grievance;
 - The date set for the resolution of the grievance;
 - A description of subsequent BAC actions taken;
 - How and when this decision was communicated to the complainant;
 - The complainant's response to the action;
 - Date of acceptance by the complainant of the action to resolve the complaint;
 - Date and timeframe for an appeal lodged by a complainant against the BAC action; and
 - Date of acceptance or rejection by the complainant of the appeal decision.

The GRC will be established at Bugesera District Level. Its role will be to act to resolve grievances that have not been closed out by BAC actions. The permanent members of the GRC will include the Mayor or his representative (to be chairperson), an officer responsible for land issues, the Vice Mayor in charge of Social Affairs and a Company representative. Co-opted members will include a village chairperson and one elder (both from the village to which a complainant belongs). The complainant will have the right to bring one other person to support him/her present his/her case to the GRC. Decisions will be reached by consensus. If a consensus cannot be reached a decision will be made by majority voting (excluding the chairperson). In the event of a tie then the chairperson's casting vote is final.

Based on the principles described above, the Grievance Mechanism involves seven stages which are presented and described briefly below and, also, shown in Figure 7-1 (with cross-references to the key steps shown in Figure 7-1).

7.5 Grievance Mechanism Procedure

7.5.1 Introduction

BAC will determine how grievances can be submitted. These are expected to include:

- Locating grievance boxes in well-known and publicly accessible locations. Complainants can submit a written grievance;
- Via designated BAC employees, such as the Community Liaison Officer (CLO), who are regularly in contact with local stakeholders (presented orally or in writing);
- Via email or via a dedicated website page; and
- By telephone/SMS to a dedicated telephone number (cell and landline numbers).

In its disclosure of the Grievance Mechanism, BAC will explain the means to be used to submit a grievance and take immediate action to ensure that these means are in place and working.

7.5.2 Grievance Identification

The CLO is responsible for managing individual grievances. When a grievance is recorded (either verbally or in written form) it is recorded in the Grievance Form (Appendix 1) by the complainant and the CLO. Both parties then 'sign off' the Grievance Form (Step 1).

If a grievance does not relate to the Proposed Project, the CLO will contact the complainant and provide the details of the appropriate person or organisation to address the grievance raised.

7.5.3 Registration and Categorisation

All grievances received verbally or in writing will be recorded by the CLO in the Stakeholder Grievance Procedure Database (Appendix 2) by means of the Grievance Tracking and Close-Out Form (Appendix 3). The CLO will assess the significance of the grievance and allocate it to one of the following categories:

- Critical Priority: potential for significant breach of BAC's policies and/or negative media attention or a local, isolated or 'one-off' grievance that may affect the interests of a community to the extent that livelihoods of a significant number of its inhabitants are jeopardised in the near term;
- Medium Priority: widespread and/or ongoing repeated grievance, for example, noise during construction or a local, isolated or 'one-off' grievance that may affect the interests of an individual, or household to the extent that livelihoods are jeopardised in the near term; and
- Low Priority: a local, isolated or 'one-off' grievance with no significant reputational or livelihood implications.

If unable to deal with a grievance directly, the CLO will assign it to an appropriate Company employee or team for resolution. The CLO remains responsible for tracking the grievance and ensuring that it is addressed.

7.5.4 Acknowledgement

Upon submission of a grievance, regardless of the method used, complainants will be sent a letter of acknowledgement within 48 hours informing them that their grievance has been received and logged. Oral acknowledgement will be provided, where appropriate, and information will be provided on the course of action to be followed, an indicative timeframe for resolution, and contact details of the person within BAC assigned to deal with the grievance (Step 2).

7.5.5 Investigation and Consultation

Following assignment of a grievance to an appropriate Company employee or team, an investigation will be conducted into the grievance, during which field investigation as well as consultation with the complainant and Company representatives may be carried out. The assigned individual or team will work in collaboration with the CLO to identify action(s) to resolve the grievance as appropriate (Step 3).

7.5.6 Communication of Resolution and Request for Feedback

The CLO will communicate the outcome of the investigation to the complainant and request feedback on the proposed action to close out the grievance. All grievances must be responded to within 5 working days of being received, even if the response is just a summary of what is planned and when it is likely to be implemented, or an explanatory note clarifying why action is not required. The response must be in writing, though a verbal response will also be provided where appropriate. If a grievance was submitted anonymously (for example, through a grievance box), the CLO will make public the results of the investigation and the proposed course of action. All actions will be logged in the grievance database.

A proposed action to resolve a grievance must be conveyed to the complainant within 30 calendar days of receipt of the grievance (Step 4). Complainants will be asked to give their response to the proposed action.

7.5.7 Appeal

If a resolution cannot be achieved, the complainant can appeal to the GRC (Step 5).

7.5.8 Grievance Resolution and Close-Out

When specific actions are agreed upon by BAC and the complainant, the CLO will be responsible for ensuring that these corrective actions are implemented and effective at resolving the grievance. If no further action is required, then the CLO and an assigned BAC senior employee and the complainant will close the grievance and record this action in the grievance database. The Company and the complainant will both sign a closure form.

If the complainant rejects a decision of the Grievance Committee, then recourse to judicial or administrative procedures remains open to the complainant (legal or administrative resolution of the grievance).

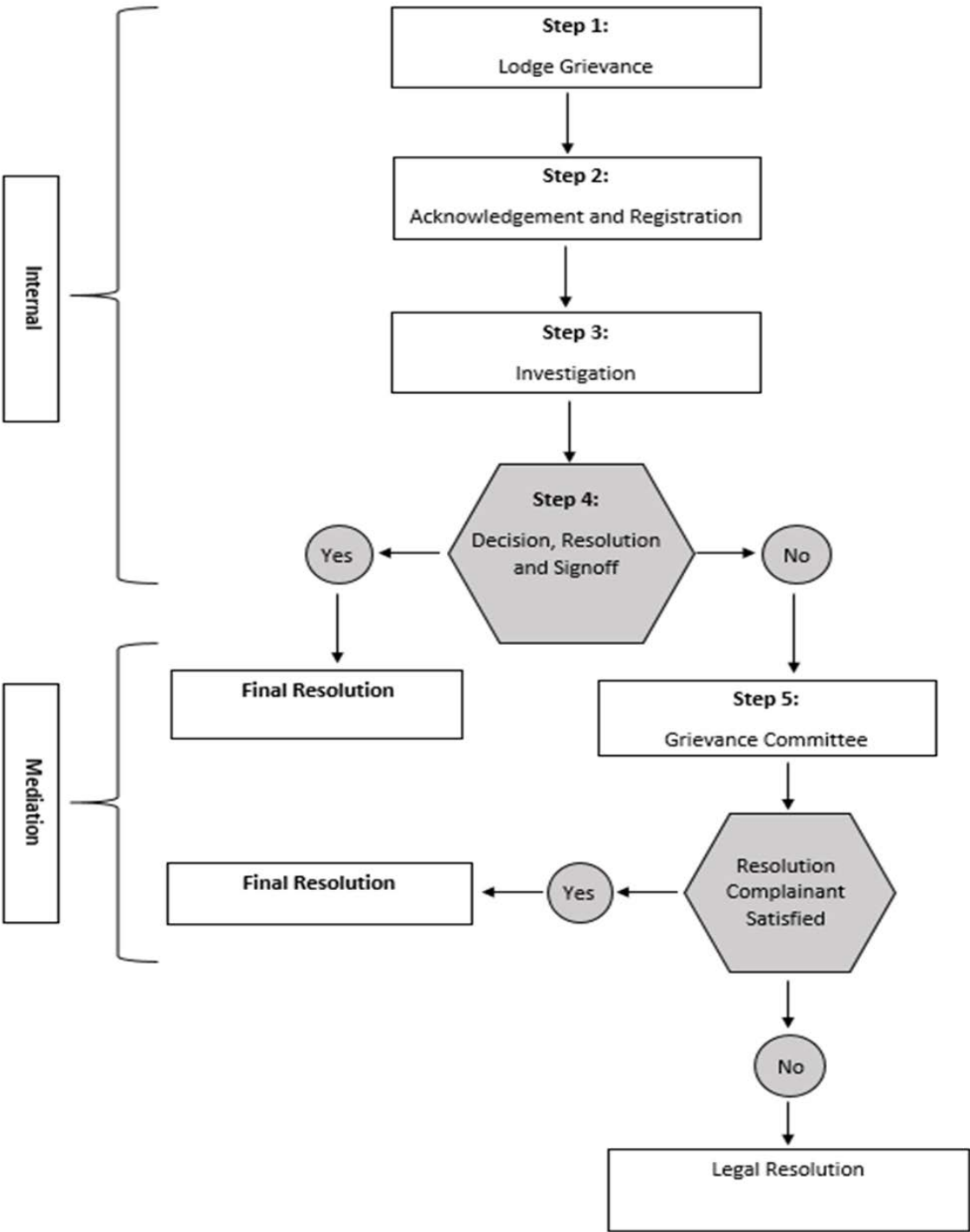


Figure 7-1: Grievance Mechanism Procedure

8. RESOURCES AND RESPONSIBILITIES

The overall oversight responsibility for implementing this SEP lies with BAC. A key task is to ensure adequate recording of stakeholder comments and existence of a clear auditable 'trail' showing the comments, their source and how they were considered in the ESIA updating process, especially in the drafting of the new ESIA Report. BAC will be assisted by Ramboll Environ and its local partner, NEWPLAN Consulting Engineers & Planners (collectively the 'ESIA team'), to implement specific disclosure and consultation activities. BAC will ensure that a senior staff member will attend all consultation events.

BAC has appointed Mr. Isolino Gomes to have overall responsibility for the operational management of SEP implementation, including the Grievance Mechanism. In particular, Mr Gomes will ensure that the activities outlined in Tables 6-1 and 6-2 above are implemented effectively and on schedule. He will allocate sufficient working days to the task of implementing the SEP and will be able to call upon support staff as necessary.

Mr Edwin Rukyalekere is the appointed CLO and will have day-to-day responsibility for managing the Grievance Mechanism procedure and sufficient time will be made available to enable him to manage the Grievance Mechanism procedure effectively.

Key stakeholder engagement tasks to be undertaken by BAC personnel are (not in order of importance):

- Assisting in reviewing information disclosure materials and timely issuance of approvals for their disclosure;
- Providing timely approvals for allocation of resources for printing and distribution of disclosure materials;
- Sending formal written invitations to workshops and other stakeholder events;
- Identifying and organising meeting/event venues with appropriate technical and welfare facilities and providing refreshments (as considered necessary);
- Arranging and managing transport for selected stakeholders (limited to certain Affected Community stakeholders) so that they can attend meetings/events;
- Provision of responses to comments from members of the public, government authorities, media and NGOs;
- Grievance mechanism administration;
- Managing information for disclosure (with periodic updates) on BAC's website;
- Weekly collation and analysis of all stakeholder comments/concerns received via email or via Company website (as per the comment/concern management procedure outlined above in section 7.2) and reporting to senior management;
- Weekly collation and analysis of grievances received (as per the Grievance Mechanism presented above in section 7.3) and reporting to senior management and the ESIA team; and
- Monthly reporting on SEP implementation progress to senior management.

The ESIA team will play a key role in implementing the SEP commitments. It will liaise closely with BAC regarding day-to-day operational matters. An important function will be to ensure that all stakeholder engagement activities are recorded (specific templates for recording key information on participants and the results of meetings/events will be developed). All comments from consultation events will be recorded in both a consistent and transparent fashion. Meeting/event Minutes will be incorporated into the stakeholder database that will be maintained by BAC.

The Company will establish a stakeholder database that includes details of key stakeholders, their participation in ESIA consultations processes and issues raised. The database will be designed to allow information to be assembled, collated and analysed. The stakeholder database is a dynamic tool that will be revised and updated, as necessary, to enable it to be used in the project construction phase, should the necessary approvals for the Proposed Project be obtained.

Toward the end of ESIA work, an account of the stakeholder engagement process will be prepared. This report will present the disclosure and consultations activities conducted; levels of stakeholder participation, particularly for women and vulnerable groups; the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the new ESIA Report. This account will be inserted as a chapter entitled 'Stakeholder Identification and Engagement' in the new ESIA report.

9. MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder engagement process are important elements to ensure that BAC is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. A series of key performance indicators for each of the two ESIA stages is presented in Table 9-1 and performance against the indicators will show the extent of successful completion of stakeholder engagement commitments.

| Table 9-1: Key Performance Indicators | | |
|---|--|--|
| ESIA stages and activities | Purpose | Key performance indicators |
| <p>1. Terms of Reference: Defining the new ESIA Report 'scope/contents'</p> <p>AND</p> <p>2. The new 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 new 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:</p> <ul style="list-style-type: none"> • 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. • Number of concerns/complaints about non-receipt of materials or lack of time for commenting received. |

APPENDIX 1
GRIEVANCE FORM

| | | | |
|---|---|--|--|
| Concern/Complaint Reference Number | | (for Company use only): _____ | |
| Full Name of individual or organization/community (an individual's name to be inserted if complainant agrees) ⁸ | | _____ _____ _____ | |
| Contact Information: Please indicate by marking the box how you wish to be contacted (in person, by telephone/SMS, by e-mail, by post) and then provide the appropriate contact information | | <input type="checkbox"/> By Post: Please provide full address: _____ _____ _____ <input type="checkbox"/> By Telephone/SMS: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> In person: Please provide name of village _____ | |
| Preferred language for communication | | <input type="checkbox"/> [Kinyarwanda] <input type="checkbox"/> [English] <input type="checkbox"/> [French] | |
| | | | |
| Description of your concern/complaint: | | What happened? Where did it happen? Who did it happen to? What has been the consequence for you? | |
| | | | |
| Frequency of cause/s of your concern/complaint | | | |
| | <input type="checkbox"/> Single incident (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem) | | |
| | | | |
| What would you like to see happen to resolve your concern/complaint? | | | |
| | | | |
| Signature | | Date | |

⁸ A concern or complaint can be submitted anonymously.

APPENDIX 2
EXAMPLE OF KEY DATA TO BE RECORDED IN A GRIEVANCE REGISTER

| Example of Key Data to be Recorded in a Grievance Register | | | | | | | |
|---|---|-------------------------------------|---|-------------------------|--|------------------------------|-------------------------------------|
| Grievance ID | Name/address | Concern or complaint | Response mechanism | Answer | Status | Response accepted (yes/ no?) | Appeal decision accepted (yes/ no?) |
| Format as year.mm.dd and concern/ complaint number (e.g. 17.05.26: #01) | Insert name and address of the person submitting a concern or complaint (if provided) | Summary of the concern or complaint | Personal letter, e-mail, telephone call/ SMS, orally backed up by letter, information board announcement. | Summary of the response | Date of response, identify whether the grievance is addressed and closed | Yes/ No | Yes/ No |

APPENDIX 3
GRIEVANCE TRACKING AND CLOSE-OUT FORM

REGISTRATION DETAILS

COMPLAINT REGISTRATION No. _____
(No. to be taken from complaints log)

DATE RECEIVED _____

LOCATION _____
(Village, Cell, Sector, District)

Complainant (Name) _____

Telephone Number _____

Address (If Applicable) _____

PART 2: GRIEVANCE DESCRIPTION

Category of grievance (please circle the appropriate category)

- Property (built structures) damage
- Land encroachment
- Access restriction
- Damage to land/crops
- Damage to livestock
- Water availability/quantity (e. g. supply disruption)
- Water quality (e.g. pollution)
- Noise/air quality (including dust)
- Resettlement/valuation/compensation
- Traffic/vehicle behaviour (e. g. speeding)
- Other (Specify)

Details of Grievance:

Priority of Grievance (please circle as appropriate)

- Critical
- Medium
- Low

| PART 3: PROPOSED RESPONSE/ CORRECTIVE ACTION | |
|--|--------------------------|
| Immediate Action | ___Date for completion |
| <hr/> | |
| <hr/> | |
| Responsible Person: | |
| Signature | |
| Date: | |
| Long term Action | _____Date for completion |
| <hr/> | |
| <hr/> | |
| Responsible Person: | |
| Signature: | |
| Date: | |
| Other resolution details | |
| PART 4: VERIFICATION OF CORRECTIVE ACTION | |
| Follow up details (If applicable) | |
| <hr/> | |
| Closed out (Yes/No) : _____ | |
| Signatures: | |
| Complainant: _____ | |
| Company: _____ | |
| (Date) | |