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MINISTRY OF INFRASTRUCTURE (MININFRA)



RWANDA ENERGY GROUP (REG)

ENERGY DEVELOPMENT CORPORATION LIMITED (EDCL)

**Rwanda Transmission System Reinforcement and Last Miles Connectivity project
(RTSRLMCP)**



Final Report

**ABBREVIATED RESETTLEMENT ACTION PLAN (ARAP)
FOR RUHANGO AND NYANZA EPC**

Kigali, July 2024

Declaration

We, the undersigned, hereby declare that this Abbreviated Resettlement Action Plan (ARAP) for Rwanda Transmission System Reinforcement and Last Miles Connectivity project (RTSRLMCP), represents the facts pertaining to the Proposed “Design, Supply, Installation of Medium and Low Voltage and Services connections in Nyanza and Ruhango Districts in form of Engineering Procurement and Construction (EPC)”.

On behalf of the Rwanda Energy Group, a subsidiary of Energy Development Corporation Limited (EDCL)

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Abbreviated Resettlement Action Plan summary Sheet

No	Variables	Data
A. General		
1.	Provinces	Southern of the Republic of Rwanda
2.	Districts	RUHANGO and NYANZA
3.	Sectors	Kabagali, Kinihira, Mwendo, Kinazi, Ntongwe, Bweramana, Mbuye, Ruhango & Byimana and Busasamana, Kigoma, Rwabicuma, Mukingo, Muyira, Ntyazo, Kibilizi, Busoro, Nyagisozi and Cyabakamyi.
4.	Activity(ies) that trigger abbreviated resettlement	Construction of MV Lines
5.	Project overall cost	1,166,992,708Rwf = US\$ 9,455,972.88
6.	ARAP Total Estimated budget (Rwf)	732,548,882
7.	Applied cut-off date (s)	02/05/2023
8.	Dates of consultation with the people affected by the project (PAP) and other stakeholders	02/05/ - 25/07/2023
9.	Dates of the negotiations of the compensation rates / prices	01/-30/12/2023 03-30/01/2024
B. Specific information		
10.	Number of affected households	3,279
11.	Number of females headed affected	73
12.	Number of vulnerable affected	62
13.	Number of elderly	531
14.	Number of youths heading households	17
15.	Number of PWD	5
16.	Area affected (SQM)	1,412,400

No	Variables	Data
A. General		
17.	Number of households losing their crops	3356
18.	Number of tree (Ha) lost	8.5928
19.	Number of tree (Piece) lost	53,183
20.	Number of crops (Ha) lost	136 Ha
21.	Number of crops (Piece) lost	157

Glossary of Key Terms

Compensation	Payment in cash or in kind to replace losses of land, housing income, and other assets caused by the project
Census	Household survey that covers all Project Affected Persons irrespective of entitlement or ownership. It provides a complete inventory of all projects affected persons and their assets. It can be used to minimize fraudulent claims made by people who move into the area affected by the project in the hope of being compensated and/or resettled.
Cut-off Date	The date of the census prior to which, the occupation or use of the project area, qualifies residents or users of the project area as affected persons, when persons are not eligible for compensation or resettlement assistance. Date of completion of the census and assets inventory of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance.
Grievance Redress Mechanism	Dispute resolving mechanism that is available at the project level for persons affected under the project to submit project related grievances and to seek redress for these.
Involuntary resettlement:	The involuntary taking of land resulting in direct or indirect economic and social impacts caused by: <ul style="list-style-type: none"> - Loss of benefits from use of such land. - Relocation or loss of shelter.

	<ul style="list-style-type: none"> - Loss of assets or access to assets; or - Loss of income sources or means of livelihood, whether or not the PAP has moved to another location. - Resettlement is involuntary when the project implementing agency has the right to expropriate land under national law.
Involuntary Land Acquisition:	This is the taking of land by Government or other Government agencies for compensation, for the purposes of a public project against the will of the landowner. The landowner may be left with the right to negotiate the amount of compensation proposed. This includes land or assets for which the owner enjoys uncontested customary rights.
Monitoring	The process of repeated observations and measurements of environmental and social quality parameters to assess and enable changes over a period of time.
Project Affected Person (PAPs) and Displaced persons	<p>Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.</p> <p>That Refers to all the people who, on account of the activities listed above, would have their (1) standard of living adversely affected; or (2) right, title, interest in any house, land; (3) access to productive assets adversely affected, temporarily or permanently; or (4) business, occupation, work or place of residence or habitat adversely affected; and “displaced person” means any of the displaced persons.</p> <p>Includes any people, households, firms or private institutions who, on account of changes that result from the project will have their</p> <ul style="list-style-type: none"> (i) Standard of living adversely affected, (ii) Right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently ore temporarily; and/or (iii) Business, occupation, place of work or residence, or habitat adversely affected, with or without displacement.

Project-affected Household	All members of a household, whether related or not, operating, as a single economic unit, who are affected by a project.
Resettlement Action Plan (RAP)	A time-bound action plan with a budget, setting out resettlement strategy, objectives, options, entitlements, actions, approvals, responsibilities, monitoring, and evaluation. a document in which the project sponsor or other responsible entity specifies procedures that it will follow and the actions that it will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by an investment project
Right of Way	Relevant laws and guidelines require maintaining a suitable Right of Way (RoW) distance in order to maintain the safety of the general public and minimize exposure to Electromagnetic Fields (EMFs). Thus, the EMFs would effectively attenuate at the edge of this RoW. According to GUIDELINES N°01/GL/EL-EWS/RURA/2015 the RoW is strip of land set aside for a safety corridor distance between the power line and nearby structures and vegetation and which is used by the Licensee to construct, maintain, or repair a power line.
Social Impact	An effect (both positive and negative) on a social issue resulting from infrastructure development projects.
Stakeholders	Those who have an interest in project development and who will be involved in the consultative process, and includes any individual or group affected by, or that believes it is affected by the project; and any individual or group that can play a significant role in shaping or affecting the project, either positively or negatively, including the host community/population.
Vulnerable Groups	Distinct groups of people who might suffer excessively from resettlement effects, such as, the old, the young, the persons with disabilities, the poor, isolated groups, and single parents.
Female-headed Household	A household headed by a female due to circumstances such as loss of husband, separation, divorce, or migration

Acronyms and Abbreviations

AfDB	African Development Bank
ARAP	Abbreviated Resettlement Action Plan
CSOs	Civil Society Organizations
DLB	District Land Bureau
EDCL	Energy Development Corporation Limited
ESIA	Environmental and Social Impact Assessment
GRM	Grievance Redress Mechanism
HHs	Households
IRPV	Institute of Real Property Valuers in Rwanda
ISS	Integrated Safeguards System
LCRC	Local Community Resettlement Committee
MINALOC	Ministry of Local Government
MININFRA	Ministry of Infrastructures
MV	Medium Voltage
NGOs	Non-Government Organizations
NISR	National Institute of Statistics of Rwanda
NST1	National Strategy for Transformation one
OS	Operational Standards
PAP/Hs	Project Affected Persons/Households
PIU	Project Implementation Unit
PSF	Private Sector Federation
PWD	People with Disability
REMA	Rwanda Environment Management Authority
RoW	Right of Way
RTSRLMC	Rwanda Transmission System Reinforcement and Last Mile Connectivity
RUEAP	Rwanda Universal Energy Access Program
RURA	Rwanda Utilities Regulatory Agency
Rwf	Rwandan Franc
VUP	Vision 2020 Umurenge Program

Executive summary

The Government of Rwanda (GoR) through Rwanda Energy Group, subsidiary of the Energy Development Corporation Limited (EDCL) under the funding from the African Development Bank (AfDB), has secured a budget for construction of a Medium Voltage and Low Voltage lines in Ruhango and Nyanza District to supply power in 9 sectors of Ruhango District (Kabagali, Kinyihira, Mwendu, Kinazi, Ntongwe, Bweramana, Mbuye, Ruhango & Byimana Sectors) and 10 Sectors in Nyanza District (Busasamana, Kigoma, Rwabicuma, Mukingo, Muyira, Ntyazo, Kibilizi, Busoro, Nyagisozi and Cyabakamyi Sectors).

The project will be co-financed by the African Development Bank (AfDB). Although coordination will be ensured among co-financiers, African Development Bank (AfDB) will retain the responsibility to monitor the environmental and social impacts of their respective investments under the project. This Abbreviated Resettlement Action Plan (ARAP) covers only components in EPC Ruhango-Nyanza under AfDB financing.

The project consists of the upgrading of upgradable and the construction/strengthening of nonupgradeable, of MV networks, related distribution transformers and services connections distributed in two (2) districts of the Southern Province: (Nyanza and Ruhango). The project scope includes essentially:

- 121 km of medium voltage (MV) Lines
- 422 km of Low Voltage (LV) Lines
- 147 Distribution transformers
- Expected Number of HHs to be connected is 3,279.

Even though environmental and social impacts to be triggered by the implementation of construction activities are minimum, the Design, supply, installation of Medium and Low Voltage and Services connections in Nyanza and Ruhango Districts will not require land acquisition or physical displacement of PAPs, only some crops and trees will be affected within the electrical lines right of way and all of them shall be compensated in compliance with the national expropriation law in public interest and AfDB ISS requirements. Under this specific project, the activities of construction of Medium Voltage induces resettlement, this consists only of damage of the crops and trees within the right of way (RoW). Therefore, there is no planned relocation of the Project Affected Persons (PAPs).

Avoidance Mechanism

It is the responsibility of EDCL-REG to avoid and minimize the impacts on the PAPs. The following are the main procedures adopted by all EDCL projects:

- EDCL-REG has planned to implement its projects using only the corridor (RoW).
- Engage with affected communities, landowners, and other stakeholders early in the planning process to understand their concerns and preferences. Incorporate their input into the project design to minimize negative impacts on their properties and livelihoods.
- Ensure that the expropriation process complies with relevant laws, regulations, and procedures, including requirements for public consultation, environmental assessment, and compensation. Adhering to legal standards can help build trust and legitimacy in the expropriation process.

ARAP Purpose and Objectives

The objectives of this ARAP correspond to those of the AfDB Policies on involuntary Resettlement, namely Operational Safeguard 2 – Involuntary resettlement: land acquisition, population displacement, and compensation for AfDB. More specifically, this ARAP is prepared (1) to mitigate the negative social impact of project-induced asset loss and through (a) the provision of appropriate compensation and/or livelihood opportunities (regardless of the legality of existing land tenure arrangements), and (b) ensuring that asset valuation methodology is implemented with meaningful consultation and the informed participation of the affected people.

Legal and Institutional Framework for Resettlement

The ARAP was prepared in compliance with:

- Different legislative and policies especially Law N° 32/2015 of 11/06/2015 Relating to Expropriation in the Public Interest.
- AfDB's Integrated Safeguards System (ISS) Especially Operational Safeguard (OS) 2 – Involuntary resettlement: land acquisition, population displacement and compensation.

Census and applied cut-off date

The effective date for the start of the Design, Supply, and Installation of Low Voltage And Medium Voltage Lines and Service Connections with the total length of 121 km for medium voltage line and 422 km for Low voltage line was March 2023.

The cut-off date is 02/05/2023 and Construction of Medium Voltage (MV) activities will start after the compensation activities. The same date has been considered as commencement of the assets inventory and census of the project affected persons with both NYANZA and Ruhango Districts.

Socio-economic of the affected persons

The project affected persons were identified and their socio-economic of these community has been surveyed where it has been found that both districts (NYANZA and RUHANGO) have 3,279 PAHs, with 48.2% male and 51.8% female. It has been showed that 14.8% in the southern province live in urban areas, while in the other districts the proportion is as follows 9.2% in Nyanza district, 10.9% Ruhango district. 35% of households in Nyanza and Ruhango Districts use electricity from the national grid (energy supplied by REG) as the main source of energy for lighting, other sources of energy are 0.2% from privates 19.9% using solar power, 1.8% using generator/batteries, 1.3% kerosene/paraffin/lantern lamp, 2.0% candles, 4.7% firewood, and 34.6% flashlight/ phone flash lighting, the other socio-economic details are highlighted in chapter of baseline socio-economic. Approach and methodology used for the preparation of this ARAP has been developed to collect and consult with different stakeholders.

Eligibility Criteria of the Project Affected Persons

There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to AfDB Safeguards standards. The following are the identified category of project-affected persons (PAPs) for this project who are entitled to mitigation/compensation:

- Individuals who have formal legal ownership rights to land
- Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights.
- Individuals who do not have any recognizable legal right, but who have a legal claim to the land: provide compensation for (complete or partial) loss of standing crops, trees, or plants.

Although Rwandan legislation has no reference to entitlement to compensation for those who do not have legal rights, EDCL-REG pays the compensation for all investments made on the land to the PAPs regardless of their ownership status.

Institutional Arrangements

The overall coordination of the implementation of the ARAP is provided by EDCL which oversees all resettlement planning and coordinates all issues relating to the compensation. EDCL will do this in close collaboration with local authorities falling within the project area under the oversight of the Ruhango and Nyanza districts. The EDCL shall collaborate with different institutions during the implementation of the project activities such as MININFRA, the Ministry of Environment, among others. Institutional Roles and responsibilities of authorities (Line Ministry and affiliated agencies, Central and Local levels) and structures involved in the implementation of the RAP.

The overall coordination of the implementation of the ARAP is provided by EDCL which oversees all resettlement planning and coordinates all issues relating to the compensation. EDCL will do this in close collaboration with local authorities and other stakeholders falling within the project area.

Fund Flow and compensation Plan

The EDCL goes through the following process before processing payments.

- The project manager and Safeguards team prepare an estimated budget for the whole project activities, including compensations, this budget is passed on to the Financial Department at RUEAP/EDCL-REG in order to make the payment. (After the finalization of bidding procedures)
- The PIU of the EDCL-REG approves the budget prior to the construction activities (at least five months)
- The Financial department requests a certain amount of money based on preliminary estimates provided by project engineers. (at least four months before the civil works)
- The compensation value will be transferred to the EDCL financial department (at least three months before the construction)
- The certified independent valuer begins the census survey and calculates the needed compensations accordingly. They send the survey lists, supported by the ID copy, land title, and account number copy of the owner to the district which is responsible for approving the inventory.

- Thereafter they request the Financial Department to prepare the payment and send it to MINECOFIN for payment. (at least one month before the construction)
- The entire amount of compensation should be paid to the owners prior to the construction.

Stakeholder's engagements

Consultation activities have been carried out as a continuum process that started before the start of preparation of the ARAP and the ESIA and have continued during preparation of the ARAP study. REG-EDCL has applied multi-levels of consultations with the stakeholder and the PAPs during the preparation of the ARAP. The consultation process is expected to be continued by REG-EDCL and contractor during various stages of the project. 7 stakeholders' engagement have been conducted from 25/05/ - 25/07/2023 where all PAPs have been consulted and the consultation is still undertaking, the other potential Stakeholders consulted are 137 and table number 17 shows the segregation by gender.

The consultation activities (census survey, scoping, interviews, and focus group discussions) with various stakeholders and community people in the host communities including the affected persons were held for the proposed project area in compliance with relevant African Development Bank (AfDB) and Rwandan legislations. These activities were conducted in relation to the land acquisition and the mitigation of resettlement impacts, in addition to outlining the key aspects that were addressed when holding the consultation activities.

The consultation process has included women and ensure that their participation is actively sought in identifying impact, developing appropriate mitigation measures, and during implementation and monitoring. As Social and cultural factors, may exclude women from participating actively in planning, implementing, and executing resettlement activities; Special efforts will be made to ensure their inclusion.

ARAP Impacts and losses

Under this specific project, there are some impacts that are identified and mitigated during the construction of the MV lines, such impacts are in 3 categories such as temporary Impacts, restrictions on land use, Permanent Impacts like acquisition of the right of way where for example the forests can be presently removed and those can affect Vulnerable Groups but their opinion have been considered during all process of the preparation of this resettlement plan, different

mitigations have been planned such as minimizing Resettlement Impacts by cutting the trees and damage crops which can affect and cause the incident or accidents to the local people.

Grievance Redress Mechanism (GRM)

The grievance Redress Mechanism represents one of the important processes that should be tackled carefully during the project implementation. A grievance system is also important for REG-EDCL to ensure that complaints are properly handled without delay that may negatively affect the project. Moreover, to ensure that information is shared transparently and that they are accountable to the hosting communities. The GRM under this project will be centered around grievance committees that will be established at the cell level. Training on the GRC functionality will be provided to the members prior before any activities are implemented on the ground.

ARAP implementation arrangements

The EDCL/RUEAP shall set up necessary systems (i.e. resources, staff, and procedures) to ensure the implementation of an ARAP on a regular basis and take corrective action as necessary. Affected persons will be consulted as part of the monitoring activities. The implementation and effectiveness of the resettlement action plan shall be subject to monitoring and review by qualified resettlement specialists and/or other independent third parties where deemed necessary as appropriate and commensurate to the scale and risks involved in the resettlement.

Implementation of an ARAP will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan and requirements outlined in this ARAP.

ARAP implementation schedule

This ARAP is expected to be implemented within the project timeframe, either 18 months with difference sequences of the planned activities up to ARAP implementation Completion Report or reconstruction audits of the resettlement. The table 13 details the tentative implementation schedule.

Monitoring and Evaluation Arrangements

This part describes arrangements for monitoring implementation.

Monitoring aims at tracking project implementation procedures. It will address the following aspects:

- Follow up on the activities assigned under the ARAP (valuation, awareness raising events, disclosure, dissemination activities)
- Follow-up on the status of the PAPs
- Follow up on the process of grievances to identify the efficiency of livelihood restoration: agriculture, business.
- Provision of all data needed to apply the mid-term evaluation and final assessment.

The evaluation should ensure that policies have been complied with in addition to providing the needed feedback for adjusting strategic directions during and after the projects activities implementation.

Total Cost of implementing the ARAP

The compensations are calculated according to the updated IRPV price for Compensation for land and EDCL-REG will compensate PAPs for the entire area affected by the project activities, especially properties located in the RoW. And all expropriation processes shall be done in compliance with the African Development Bank (AfDB) policies and national expropriation law in public interest number 32/2015 of 11/06/2015.

Compensation for properties is calculated according to the corridor of the RoW and the market price of different crops & trees which shall be affected. The sub-project will affect a total number of 3,279 PAPs including 1,120 PAPs in Ruhango District and 2,159 PAPs in Nyanza District with compensation amount corresponding to **682,498,882.00Rwf** including the 5% disturbance allowances and 10% of the contingent. In addition to this amount, there is also **50,050,000Rwf** for RAP Implementation and follow up as detailed in table 21 of this ARAP. The total estimated budget is **732,548,882.00Rwf** either **557,495.34USD** and shall be paid by the Government of Rwanda.

Conclusion and commitments

Overall, this ARAP has been developed for RUHANGO and NYANZA Districts in compliance with AfDB ISS mainly Operational Safeguards two (OS2) and National resettlement requirements especially for the projects that cannot involve relocation of the communities, this means that the project affected persons (PAPs) properties within the Right of Way (RoW) shall be affected by the

construction of the Medium Voltage lines. The Right of Way acquisition shall be done and restrictions on land use were deeply explained to the landowners through the consultation of the affected person. Under this specific project there is no livelihood resulting from the project implementation activities due to the nature of the project impact on the community, as commitment for the project implementation activities, the compensation shall be paid by the government of Rwanda through the MINECOFIN.

Chap I. Introduction

1.1. Project background

The National Transformation Strategy (NST1) target is to increase electricity production and improve quality electricity generation, affordability, and reliability. A pro-active strategy will be developed to attract industries for economic growth and to ensure that they are supplied with available, reliable, and affordable electricity. Key sectors of focus to increase demand include mining, manufacturing, Information Communication and Technology and commercial premises. Quality of electricity will be improved by continuing investments in network upgrading and strengthening as well as investing in loss reduction projects. Priority will be given to productive use connections such as industrial zones, market centers and other socio-economic facilities such as schools and health facilities.

Transmission System Reinforcement and Last Mile Connectivity (TSRLMC) development objective is to improve access to energy and efficiency of energy service delivery to households, businesses, and public institutions in Rwanda. Against this need, Rwanda Energy Group through EDCL is undertaking activities related to the project: Design, Supply, and Installation of low voltage and medium voltage lines and service connections in Nyanza and Ruhango districts in the Southern province.

1.2. Project Components

Table 1: Components of the project

Cat.	Component Name	Cost in UA	Component Description
A	Last Mile Grid Access	41,019,296	This will involve the construction of a total of 595 km of MV and 1,620 km LV connections. resulting into connection of 77,470 households. This will be in Gisagara, Huye, Nyamagabe, Nyaza, Nyaruguru and Ruhango.
B	Distribution Network	76, 370, 699	This includes. (i) Upgrade of LV single and three phase lines

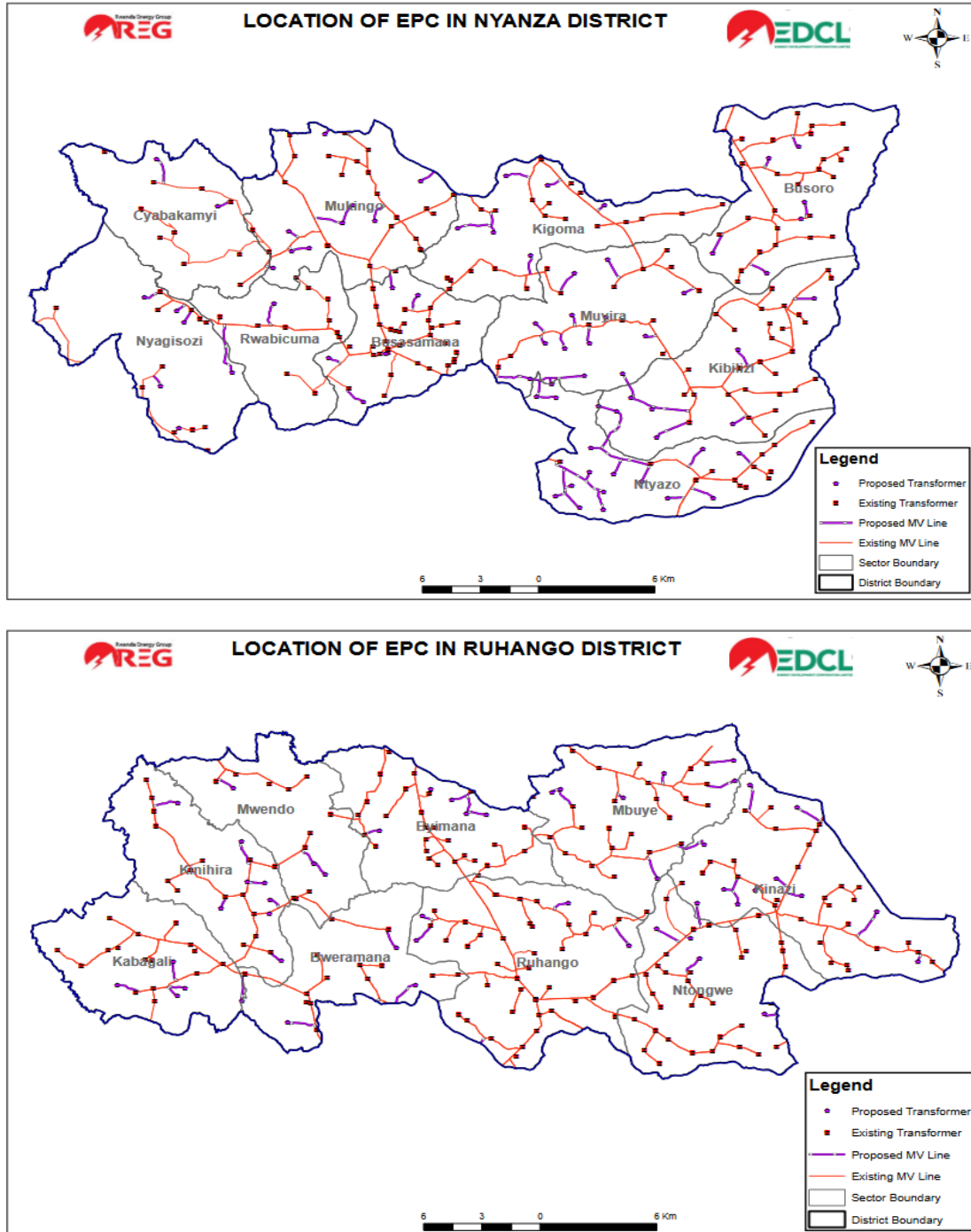
Cat.	Component Name	Cost in UA	Component Description
	Reinforcement		<p>countrywide.</p> <p>(ii) Upgrade and extension of different MV lines for improved supply and Upgrade of Karisimbi 6.6 kV line to 30 kV;</p> <p>(iii) Engineering design and installation of Low voltage underground cables & renovation of MV/LV cabins in Nyarugenge; and Upgrade of Nyamata 30/30 kV switching substation and rehabilitation of distribution substations in Rubavu, Muhanga and secondary cities.</p>
C	Transmission Lines and Associated Substations	70,172,199	<p>This includes.</p> <p>(i) 110 kV Rwinkwavu-Kirehe (37.2 km), Gabiro-Nyagatare-Rulindo (46.1 km) and Gicumbi (1.5 km),</p> <p>(ii) (110 kV Rukarara-Huye-Gisagara (45.8 km), and</p> <p>(iii) Bugesera Industrial Park to New Airport (18.5 km).</p> <p>The following associated substation will be constructed:</p> <p>(i) Kihere new substation (110/30 kV) and extension of Rwikwavu;</p> <p>(ii) (ii) Huye SS and extension of Rukarara and upgrade of Kibogora substation.</p> <p>(iii) (iii) Nyagatare SS and extension of Gabiro and Gicumbi substations.</p> <p>(iv) Bugesera Industrial Park substation (220 /110 kV & 110 /30 kV) and Bugesera International</p>

Cat.	Component Name	Cost in UA	Component Description
			Airport substations (2 transformers)
D	Engineering and Supervision Consultancy, Feasibility Study and Project Audit (Procurement Financial and Environmental)	5,610,949	<p>i. This will be for undertaking detailed component design, project supervision and management works covering the three main areas of project activities.</p> <p>ii. In line with the investment into network reinforcement, the Bank will finance a feasibility study for a REG Control and Communication Center Building to support network operations and dispatching.</p> <p>iii. A consultant will be hired to undertake environmental audit of the project</p>
E	Project Implementation	3,757,704	Project operations will mainly cover cost for the operation of the PIU, for project implementation.
F	ESMF and RAP Implementation	2,023,584	Will include implementation of construction environmental and social management plans (ESMF), and Compensation for resettlement along the Transmission Lines routes

Under this ARAP preparation, only NYANZA and RUHANGO EPCs were considered for the Design, Supply, and Installation of Low Voltage And Medium Voltage Lines and Service Connections with the total length of 121 km for medium voltage line and 422 km for Low voltage line which will be operating in Kabagali, Kinihira, Mwendo, Kinazi, Ntongwe, Bweramana, Mbuye, Ruhango & Byimana Sectors of Ruhango District and Busasamana, Kigoma, Rwabicuma, Mukingo, Muyira, Ntyazo, Kibilizi, Busoro, Nyagisozi and Cyabakamyi Sectors of Nyanza District.

1.3. Location of the project activities

The following are the maps indicating the project location within two administrative Districts of Southern Province.



Source: EDCL, 2024

Figure 1: Project location map for Ruhango and Nyanza Districts EPC's

As the project is in two administrative Districts, below are the statistical data of the intervening districts.

Table 2: Districts data of the project location

Province	Districts	Surface area covered (km ²)	Number of sectors	Number of cells	Number of villages	Population
Southern Province	NYANZA	672	10	51	420	323,719
	RUHANGO	626.8	9	59	533	359,121
Total		1,253.8 km²	19	110	953	682,840

Source: NISR, 2022

1.4. Abbreviated Resettlement Action Plan (ARAP)

1.4.1 ARAP Justification

Preliminary analysis and evidence from the ARAP reconnaissance visit indicated that the project implementation is likely to translate into environmental and social impacts, including damaging properties located in the corridor of the Right of Way (RoW) seasonal, perennial crops and trees are mostly affected, no land acquisition or involuntary resettlement planned for this project. Therefore, as part of the funding requirements for AfDB funded projects, the Government of Rwanda through EDCL/RUEAP is obligated to prepare a detailed Abbreviated Resettlement Action Plan (ARAP) in conformity with the National regulations and AfDB Integrated Safeguards System (ISS).

1.4.2 Guiding Principles for the ARAP

In developing the ARAP, the following relevant principles which are based on the AfDB's Operational Social Safeguards were applied:

- AfDB policy objectives urge that involuntary resettlement be avoided whenever possible.
- If resettlement is unavoidable, the displaced persons need to share in project benefits.
- PAPs need to participate in planning and implementation of resettlement programs; and
- PAPs need to be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to level prevailing prior to the beginning project implementation, whichever is higher.

- Transparency, to ensure that project affected persons are consulted effectively.

The AfDB policy covers direct economic and social impacts that both result from AfDB assisted investment projects. The above principles are applicable to the TSRLMCP component 1 because even though no physical relocations will occur, the AfDB policy does not only cover losses due to physical relocations, but also not covers taking of land which may result in relocation or loss of shelter, assets, access to assets or loss of income resources or means of livelihood whether or not the affected persons must move to other locations.

1.5. ARAP Scope

The detailed scope for this ARAP is as follows:

- Description of the range of potential risks and impacts to which PAPs may be subjected because of the implementation of the project.
- Review the legal and other institutional framework relevant to the project.
- Results of the baseline socio-economic survey for the project area
- Description of the consultation activities with PAP
- Description of compensation options to be provided.
- Detailed description of the likely grievances that may arise and the Grievance Redress Mechanism (GRM) to be put in place.
- Institutional responsibilities for the implementation of the ARAP as well as monitoring.
- Prepare detailed entitlement matrix and an implementation plan.
- Put in place a Monitoring and Evaluation tool with a reporting system for the ARAP.
- Assess existing capacities within the institutions that are identified as responsible for implementing certain activities.
- Where necessary, make recommendations for institutional strengthening.
- Prepare budget estimates for the implementation of the ARAP.

CHAPTER II: ARAP PURPOSE AND OBJECTIVES

It is a widely accepted fact, if the impacts of the project left unmitigated, involuntary resettlement under development projects may give rise to economic, social, and environmental risks¹. The purpose of the Abbreviated Resettlement Action Plan (ARAP) is to address any cases of involuntary resettlement that may arise, as well as to clarify the organizational arrangements that may be needed during different phases of the project preparation and implementation phases.

This includes compensating all Project Affected Persons (PAPs) for the loss of lands, properties, and livelihoods resulting from resettlement. The ARAP may be triggered whenever any of the project's activities entail the acquisition of land and / or the displacement of people, causing the loss of land, property, access (to land property), income, or sources of livelihood².

The RAP covers all the project's activities and shall apply to all Project Affected Persons regardless of the total number affected, the severity of impact, and whether or not the Project Affected Persons have ownership rights. Since resettlement often affects the most vulnerable and marginalized groups (economically, politically, and socially), the action plan shall be particularly sensitive to the affects which resettlement may have on these groups.

2.1. General Objective of the ARAP

The general objectives of this ARAP correspond to those of the African Development Bank (AfDB) Guidelines and African Development Bank's Policy on involuntary Resettlement related to avoid or minimize (as much as possible) involuntary resettlement and land acquisition through an effort to limit negatives impacts on the socio-economic status/livelihoods of affected people and communities. This general objective is pursued by borrowers through the following actions:

- Mitigate the negative impacts of displacement and identify potential development benefits.
- Establish the entitlements of all categories of affected people, including the host communities.
- Document all compensation measures and relocation activities.
- Establish procedures to guarantee fair process to the affected people, and.
- Establish procedures to monitor and evaluate the implementation of resettlement plans and take corrective action as necessary.

¹ ESIA- REG-EDCL, 2022

² RPF- REG-EDCL, 2020

2.2. Specific objectives of the Abbreviated Resettlement Action Plan (ARAP)

The main goal of an ARAP is (1) to mitigate the negative social impact of project-induced asset loss and/or restrictions of land use through (a) the provision of appropriate compensation and/or livelihood opportunities (regardless of the legality of existing land tenure arrangements), and (b) ensuring that resettlement measures are implemented with meaningful consultation and the informed participation of the affected people; as well as (2) to outline measures to effectively assist displaced persons in improving their living standards and to improve, or at least restore, their former livelihood. To achieve this goal, the following objectives have been developed:

1. To identify and assess the potential social impacts of the project and recommend mitigation measures. With regards to the PAPs, who would require some form of assistance (if needed), the goal is to identify and quantify the different categories within which to place them and to prepare the socioeconomic/inventory/census survey accordingly.
2. To describe the existing Rwandan legal and policy framework for land acquisition, and to review the laws and regulations that apply to reclaiming informally settled public and private land, involuntary eviction, and resettlement. Additionally, the aim is to review the Guidance Note on Involuntary Resettlement as well as the African Development Bank (AfDB-ISS) ISS-OS2 on Involuntary resettlement: land acquisition, population displacement and compensation. This review will seek to identify the gaps between Rwandan legislation AfDB Operational Safeguard.
3. Ensure that the ARAP is developed in full compliance with the above-mentioned AfDB Operational safeguards and policies.
4. To prepare standards for compensation or restoration of land affected by the project, to set the standards for replacing different types of losses, as appropriate, and to provide resettlement assistance standards that will furnish effective assistance for displaced persons to improve their living standards and improve, or at least restore, their former livelihood.
5. To develop a clear executive time plan for the ARAP's implementation, linking the steps of project implementation to the various project components. Furthermore, it will include the institutional responsibilities and monitoring parameters.
6. To develop communication and consultation plan for EDCL-REG to be implemented throughout the various stages of the project cycle, particularly, during the implementation of the ARAP.
7. To identify the institutional responsibility of the implementation and procedures for the grievance redress.

8. To consult the agencies responsible for compensation and land acquisition, such as National Land Authority, and to determine their roles and responsibilities.
9. To highlight the monitoring, time planning, and implementation procedures. Additionally, to establish a budget for the implementation of the ARAP.

2.3. Abbreviated Resettlement Action Plan Methodology

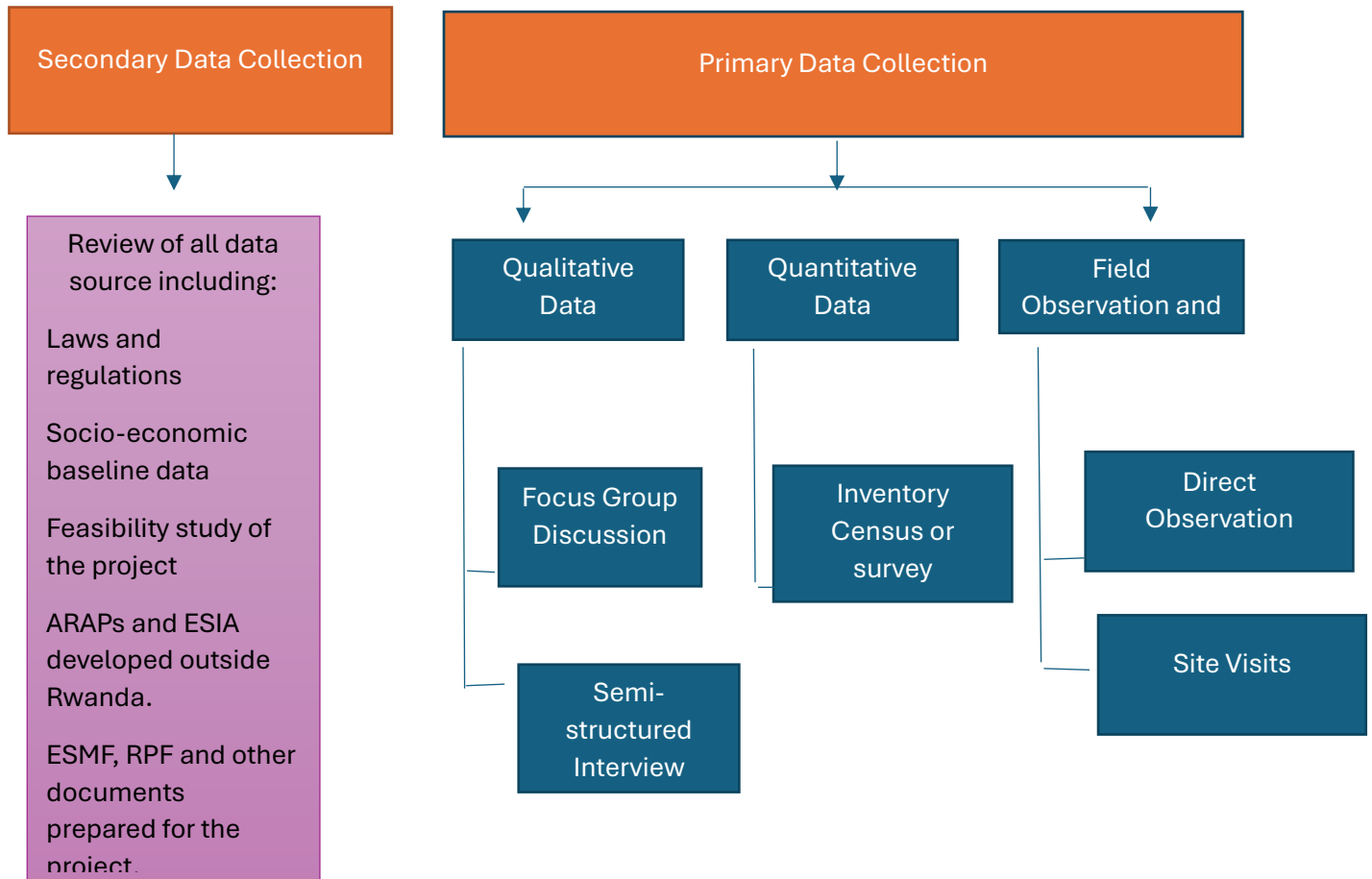
The ARAP has been prepared by conducting several consultation activities with concerned Institutions, PAPs in the villages located in the project area which includes the Stakeholders, and REG-EDCL, the preparation of the ARAP is also based on the experience of REG-EDCL in other similar projects. The discussion with the concerned bodies included information about the Rwandan Laws, views on the application methods and timing of execution.

2.4. Secondary Data Collection Method

2.4.1. Literature Review

Including laws, legislations (both national and international guidelines and safeguard policies), socio-economic baseline data in the project location, the disclosed RPF and ESIA for the project, and the feasibility study of the project as well as previously prepared ARAPs for similar projects in and outside of Rwanda. Moreover, all basic information related to the PAPs as presented by REG-EDCL was reviewed.

Figure 2: Data Collection Scheme of the Abbreviated Resettlement Action Plan (ARAP)



2.4.2. Primary Data Collection Methods

2.4.2.1. A. Quantitative data: Census/Inventory/Socio Economic Survey

The Study team designed and tested the survey Census/inventory/socio-economic Survey questionnaires for the PAPs. The applied survey covered the 3,279 PAPs population regardless of the legal status of the PAPs and the affected asset. The quantitative data collected covered various segments of landowners, as well as the nature of and the use of their land (the types of crops and trees planted in their lands, the number of structures on plot, if any). The results of survey conducted with the PAPs will be presented in Chapter 4.

Table 3: Summary of Estimated PAPs per Sector – at Nyanza and Ruhango EPC

S/N	District	Concerned Sectors	No of PAPs Per Sector
1	Nyanza	Busasamana	122
2		Busoro	87
3		Cyabakamyi	81
4		Kigoma	252
5		Kibilizi	298
6		Mukingo	177
7		Muyira	301
8		Nyagisozi	207
9		Ntyazo	574
10		Rwabicuma	60
11	Ruhango	Kabagali	243
12		Kinazi	165
13		Mbuye	38
14		Mwendo	134
15		Kinihira	120
16		Ntongwe	54
17		Bweramana	123
18		Byimana	69
19		Ruhango	174
TOTAL			3,279

2.4.2.2. B. Qualitative Data

In addition to the conventional method of preparing the ARAP, namely the inventory survey, the study team utilized additional qualitative research methods, which aimed at assisting the study team in gaining an in-depth understanding of the current socioeconomic and legal conditions of the PAPs, their livelihood dynamics, as well as their compensation preferences.

Qualitative methods could also be employed to investigate the persons that are indirectly affected by the project. Qualitative methods are generally more interactive and provide participatory techniques that can pave the way for the introduction of the structured inventory surveys to the local community and identify PAPs attitudes towards resettlement activities³.

The study team was to approach as many diverse stakeholders as much as possible through the qualitative methods; priority was given to vulnerable groups of PAPs. Another important task for the team was to employ the qualitative tools as part of the community consultation activities. The suggested qualitative methods that were used included:

- In-depth Interviews that were applied with:
 - Compensation committee in Cell to collect the needed data about the procedures applied for compensation, as well as getting the needed information about the potential PAPs.
 - Representatives of the governorates to identify their operational role in the compensation process.
 - NGOs, and community leaders were interviewed in order to identify their role and their perception towards the proposed mitigation measures.
- Focus Group Discussions (FGDs) with all PAPs.

A Focus Group Discussion (FGD) is a qualitative research method and data collection technique in which a selected group of people discusses a given topic or issue in-depth, facilitated by a professional, external moderator. This method serves to solicit participants' attitudes and perceptions, knowledge and experiences, and practices, shared during interaction with different people, under this ARAP, the FGD was done by interacting with the affected community whereby each Intervening District, we have organized two focus group per each District. The summary of the FGD outcomes have been incorporated in the public consultation as of table 17 of this ARAP.

The main indicators covered through the FGDs were:

- Characteristics of the elderly, poor people, and sick people
- Their perception towards the project
- Their awareness about the project impacts and the mitigation measures, with emphasis on their own livelihood status
- Their perception towards mitigation measures (after being influenced by the dynamic of the FGDs)

³ Resettlement Policy Framework (RPF), AfDB 2020

Outcome of Focus Group Discussion: The introductory meetings were useful for creating awareness among key stakeholder groups at community level, particularly the Village level committees that will be engaged in the implementation of the ARAP and associated Grievance Redress Mechanism (GRM). These meetings were also useful in that the PAPs were already aware of the project by the time they were consulted individually during the Baseline Socio-economic Survey as well as during the PAP census and taking of inventory of affected assets, the detailed outcome of FGD was included in consultation outcome in table 17.

The social survey was conducted by the safeguards in collaboration with the local government officials and concerned PAPs with their respective families in January 2023.

3.5. Survey Preparations

Prior to the implementation of the sub-project activities the following steps have been taken in order to prepare the ARAP including Survey:

- The RoW of 6m on one side and 6m for other side was identified according to the GUIDELINES N°01/GL/EL-EWS/RURA/2015 of 2015
- The design of the LV and MV line routes for the RoW were finalized.
- Preparatory meeting was done with both districts officials to inform them about the project activities that will be implemented.
- Different meetings were conducted with the Compensation Committee and the Social Safeguards Specialists in EDCL/RUEAP to address the potential project impacts. Later, preliminary site visits were done.
- The project affected persons census was conducted in cooperation with both districts and EDCL team.
- Based on the Rwandan regulations for expropriation and compensation, the Independent Certified land Valuer from IRPV at the affected areas was contacted and interviewed.
- The affected areas were screened during the inventory. The PAPs were addressed according to their type of loss.

3.6. Findings of the Census Survey

The following ratios will be calculated according to the total number of the land or property's owners, which is 3,279 PAHs. The socioeconomic status of each and every one PAP has been assessed to guide effective compensation. Special attention has been paid to the needs of vulnerable people

among the PAPs especially households with incomes below the national poverty line, including the landless, elderly, disabled, women, children, and other vulnerable groups as summarized in the table below:

Table 4: Summary of the vulnerable groups per category

District	All						
	Number of Household	Female Headed Households	Number of Vulnerable groups	Number of elderly People	Number of youths headed household	Number of Household headed by PWD	Total of Vulnerable People
Both	3,279						688
Nyanza	2,159	43	40	327	11	3	424
Ruhango	1120	30	22	204	6	2	264

Source: Field survey, 2024

CHAPTER III: RESETTLEMENT IMPACTS ON THE COMMUNITY

3.1 Introduction

This section will provide detailed information on the categories and amounts of significant adverse impacts on the affected crops and trees, in addition the project affected households.

The civil works including the construction and operation phases will lead to some adverse impacts which are:

- Temporal and permanent restrictions on land use
- Loss of on land developed properties (crops & trees)
- Impacts on PAPs and vulnerable groups.

3.2. Description of the resettlement Impact

Under this sub-section, we will discuss the different impacts of the resettlement on the affected community, the impacts of the resettlement for the affected community in Nyanza and Ruhango EPC's are temporary and permanent, therefore the impacts are related to the land whereby some restrictions have been identified for RoW acquisition as per Rwanda Utilities Regulatory Agency requirements for electrical Lines, the impact on stand crops, trees and on the affected communities. The construction of MV lines within two districts shall have the right of way of 12 meters for minimum safety corridor around power lines with consideration to safety clearances and electromagnetic field exposure limits, which would enable the power utility to build, maintain, replace or protect its facilities. The guidelines also provide procedures for obtaining right-of-way and responsibilities of different parties involved in right-of-way for power lines. Below are the general requirements for RoW acquisition and it is forbidden for any person to do or assist in any of the following acts:

- To construct any building or structure or carry out cultivation, farming or any other activity within the right-of-way prior to the consent of the Licensee;
- To drill, mine or excavate or carry on any similar operation within the right-of-way;
- To place any combustible material inside the right-of-way;
- To cause any fire to burn within Sixty (60) meters of the transmission line right-of-way;
- To climb on to, attach to or hang any object on or from any tower/pole or transmission/distribution line;
- To cause anything to come into contact with the power line;

- To place, drive, tow, pull or carry any crane, jig, or any object, under, over or near the transmission line except with the prior consent of the Licensee obtained in writing and subject to any condition that the Utility may impose in relation to such consent.
- To carry out any form of blasting within hundred (100) meters of any power line; and
- Permanent buildings, including foundations and overhangs, pools, septic tanks, dumps, junkyards, wells, fueling or fuel storage facilities, garbage, recycling receptacles and other non-compatible uses shall not be permitted on the right-of-way.

Therefore, any activity that can cause the incident or accident on the electrical power line is prohibited to be implemented under the electrical line, that why the impacts are highlighted and communicated to all project stakeholders and agreed on prior to start the project activities. For the temporary impacts, the project implementation phase can have to need the use of the land in given period for instance during deposit of the materials, access to site during excavation, poles transportation, erection and stringing, the land owners have been sensitized on these impact and are aware on such temporary impact while it shall be permanent for only right of way restriction as described in previous section as regulatory body stipulated.

3.2.1. Temporary Impacts permanent restrictions on land use

Temporary impact on land will be necessary for the following activities:

- Excavation work and the construction of MV and LV and Poles.
- Wiring process for both LV and MV lines
- Transformers installation and earthing system installation process

Regarding the storage area, the implementing company does not need separate lands to store the equipment the material transportation at the workplace will be done using trucks, handling, loading and unloading are done manually and mechanically using self-loader, crane or forklift. Under this project there is no land acquisition and hence only some restrictions on land use are planned as per RURA Guidelines.

3.2.2. Permanent Impacts

Permanent impact will be necessary for the following activities:

- Right of Way for the corridor but shall be restriction on land use.

- The permanent impact is limited to the restrictions to plant tall trees that above 3 meters tall, but for the short trees, there will be no restrictions to plant them.
- The excavation work and the construction of MV lines will result in damaging trees in the areas. Concerning the Right of Way, it will result in the clearing of tall trees permanently.

3.2.3. Impact on PAPs and Vulnerable Groups

The PAPs and Vulnerable Groups will lose their crops and trees as well as some restrictions which shall be imposed on their land and vulnerable groups has been identified and summarized in the table 4 of the previous chapter.

Considering that the project will work within the vicinity where there are different categories of vulnerable groups, the following are the proposed assistance that will be adopted during public consultation by the REG-EDCL:

- Considering of the opinions of the elderly and women headed HHs during consultation process.
- Sufficient and clear information to be provided to them.
- Right to the household's connection since the vulnerable PAPs is within the project scope.
- Minimizing Resettlement Impacts by cutting the trees and damage crops which can affect and cause the incident or accidents to the local people.

In addition to the above-mentioned procedures, it is crucial to pay attention to provide enough information to the illiterate PAPs. Thus, information will be attained by the provision of clear and satisfactory information to the illiterate people within the households.

CHAPTER IV: BASELINE SOCIO-ECONOMIC SURVEY

This section will present a summary of the results and findings of the census survey. The census survey covered the project affected people PAPs whom properties are likely to be affected by project sub-activities including the construction of MV lines. The Design, Supply, and Installation of Low Voltage And Medium Voltage Lines and Service Connections with the total length of 121 km for medium voltage line and 422 km for Low voltage line in Ruhango and Nyanza Districts will affect 3,279 PAHs. The magnitude of impact can be measured by considering the impact on the livelihood of the whole family.

4.2.1 Project Affected Households Heads per Districts

According to the household's survey, both districts have 3,279 PAHs, with 48.2% being male and 51.8% female. The table below provides the PAHs heads of the Ruhango and Nyanza Districts.

Table 5: Households of the project per rural and urban area

District	Total			Urban			Rural		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Nyanza	2,159	1,367	792	549	369	180	1,610	1,092	518
Ruhango	1,120	786	334	253	136	117	867	671	196

Source: Primary data, 2024

4.2.2 Area of Residency of the affected persons

The survey showed that 14.8% in the southern province live in urban areas, while in the other districts the proportion is as follows 9.2% in Nyanza district, 10.9% Ruhango district.

4.2.3 Source of Energy

35% of households in Nyanza and Rugango Districts use electricity from the national grid (energy supplied by REG) as the main source of energy for lighting. The above percentage is the same as all southern province's districts for electricity supply to the households.

Other sources of energy are 0.2% from privates 19.9% using solar power, 1.8% using generator/batteries, 1.3% kerosene/paraffin/lantern lamp, 2.0% candles, 4.7% firewood, and 34.6%

flashlight/ phone flash lighting. The table below provides the distribution of sources of energy in the southern province.

Table 6: Distribution of the main source of energy for lighting

Districts	Electricity from REG	Private Hydro Mini grid	Solar power	Generator/ Batteries	Kerosene/ Paraffin/ Biogas	Candles	Firewood	Flashlight/ phone	Other	Total	Count	
Nyanza	35.2%	0.1%	16.3%	2.2%	1.3%	0.0%	1.1%	2.5%	40.6%	0.7%	100%	2,159
Ruhango	42.2%	0.2%	16.2%	1.8%	1.4%	0.0%	1.3%	2.4%	34.0%	0.5%	100%	1,120

Source: Primary Data, 2024

The next table shows the proportion of energy for cooking in the project areas, the firewoods is frequently responded by the household surveyed on the 92.2% and 91.6% for Nyanza and Ruhango District Respectively, the charcoal has also resulted in use by the households in the same districts from 5.3% and 5.7% respectively to Nyanza and Ruhango, this reflects the 5th PHC results whereby the same survey has showed the same percentage for the source of the energy in intervening districts. Below table shows the situation in two districts.

Table 7: Proportion of the main source of energy for cooking

Districts	Firewood	Charcoal	Gas	Other	Do not cook	Not Stated	Total	Count
Nyanza	92.2%	5.3%	0.9%	0.3%	1.2%	0.0%	100%	2,159
Ruhango	91.6%	5.7%	0.6%	1.0%	1.2%	0.0%	100%	1,120

Source: Primary Data, 2024

4.2.4 Crops grown in the project area.

Project implementation will affect some of the crops in the project area, the dominant crops in two districts beans where Nyanza has shown that they grow it at the percentage of 87.6 while Ruhango

has 82.9% on the same crops and this was followed by the cassava planting with different percentage, but Ruhango District is the main area of cassava cultivation as indicated by the survey. The table below provides the most frequent crops in the project area.

Table 8: Crop types of the project area

District	Maize	Rice	Sorghum	Wheat	Bean	Soybean	Cassava	Sweet	Irish potato	Yams /Taro	Banana	Vegetables	Fruits	Count
Nyanza	47	5.4	22.9	-	87.6	16.5	75.7	40.4	4.6	16.2	26.9	10.5	56.2	2,159
Ruhango	25.9	3.5	11.5	-	82.9	27.5	80.8	52.9	3.2	17.6	23.1	14	52.3	1,120

Source: Primary Data, 2024

4.2.5. Infrastructures

The infrastructures of the project’s areas are relatively established normally in urban areas of Nyanza and Ruhango Districts. Physically, there is a network of access roads that are linked with selected sectors but sometimes in bad conditions, bridge to reach the cells and other isolated area especially during rainfall period. Most of the roads are compacted by laterites and some of them are damaged by erosion. There is also electricity provided by REG generally in suburban Districts. Telephones are also available from telephone companies’ towers.

Figure 3: Typical roads of the project areas.



CHAPTER V: LEGISLATIVE AND REGULATORY FRAMEWORK

This chapter describes National Administrative entities from central to local government, the relevant policies, legal instruments and institutional arrangements applicable to the construction and rehabilitation of electrical lines in different administrative districts of Rwanda in reference to the international framework. The present ARAP has been prepared to comply with the requirements of the relevant national legislation as well as African Development Bank safeguards requirements. The emphasis also was on the AfDB Operational Safeguard, Involuntary Resettlement in order to better articulate the Banks safeguard standards while improving their clarity, coherence and consistency.

The legal framework analyses the approach to Land Access and Management, Establishing rates of compensation, determining eligibility for compensation and resettlement assistance, including livelihood initiatives, establishing mechanisms to resolve grievances among affected persons related to compensation and eligibility and the legislative framework of social protection.

The principles for Compensation and Resettlement state that compensation and resettlement of project affected people will be carried out in compliance with Rwandan legislation, AfDB Safeguards Policies. Where Rwandan legislation is less favorable to PAPs than AfDB safeguards requirements or does not apply at all, these latter shall apply. Thus, the ARAP provides an analysis of gaps between national legislations and the requirements of AfDB as well as other measures to be taken to bridge the assessed gaps.

5.1. National Administrative entities

The current revised Constitution of Republic of Rwanda divides Rwanda into Provinces (*Intara*), Districts (*Uturere*), City Of Kigali (CoK), sectors (*Imirenge*), cells (*Utugari*), and villages (*Imidugudu*); the larger divisions, and their borders, are established by Parliament. From the Administrative District to Village is considered as Local Government.

The four Provinces and City of Kigali act as intermediaries between the national government and their constituent districts to ensure that national policies are implemented at the district level. Each province is headed by a governor, appointed by the President and approved by the Senate.

The districts are responsible for coordinating public service delivery and economic development. They are divided into sectors, which are responsible for the delivery of public services as mandated by the administrative districts. Districts and sectors have directly elected councils, and are run by an executive committee selected by that council.

The cells and villages are the smallest political and decentralized units, providing a link between the people and the sectors. All adult resident citizens are members of their local cell council, from which an executive committee is elected. Main national Institutions involved are:

The Ministry of Environment (MoE). The Ministry of Environment (MoE) was established to ensure the conservation, protection and development of the environment. MoE counts 4 Technical Units, each headed by the Director General that divide responsibilities to implement the MoE's programs:

- Environment and Climate Change Unit;
- Land, Water and Forest Unit;
- Mining Unit; and
- Finance & Administration Unit

MoE has specific Authorities with specific mandates to implement particular programs related to Environment and Natural Resources management, namely:

- Rwanda Environmental Management Authority (REMA);
- National Land Authority (NLA);
- Rwanda Water *Resources* Board (RWB);
- Rwanda Green Fund (FONERWA);
- Rwanda Meteorological Agency (Meteo-Rwanda).

Ministry of Infrastructure (MININFRA). The Ministry of Infrastructure is the parent ministry of the Rwanda Energy Group Ltd (REG). It covers the following sectors: transport; energy; housing and human settlement; water and sanitation.

- Rwanda Energy Group Ltd (REG). REG aims to transform the industry, its dynamic and performance, and to reinforce its customer centered operations in order “to provide sufficient and quality electricity to our customers at affordable and sustainable rates that support the socio-economic development of the country.” REG is composed of two subsidiaries, namely Energy Utility Corporation Limited (EUCL) and Energy Development Corporation Limited (EDCL).
- The Rwanda Universal Energy Access Program (RUEAP), Government of Rwanda in partnership with development partners including African Development Bank (AfDB),

launched the Universal Energy Access Programme in 2020 as its flagship programme to realize the primary electricity access targets of the NST1.

○ ***District Administration Level Implementation or Local Government***

- **District Administration Authorities or Local Government Officials:** the District authorities in the Project Area are the coordinating bodies for resettlement activities at the district level. The District-level departments provide a review and monitoring role, and provide political and administrative support in the implementation of the ARAP.
- **District Land Bureaus:** the District Land Bureaus (DLBs) which is in District One Stop Center (DOSC) are the executive bodies responsible for ensuring activities undertaken comply with National and District level Land Use Master Plans.
- **District Land Commission:** this is a consultative/ advisory institution which has the mandate to monitor and evaluate work done by the District Land Bureaus. As an advisory body the District Land Commission is in charge of establishing Sector/Cell Land Committees.
- **District Task Forces:** to specifically coordinate project-related activities, district task forces will be set up. This will include representatives of the various district departments such as land valuation, infrastructure, social affairs and environment. They will act as the key implementing bodies for ARAP related activities at district level, coordinating with EDCL's Project Implementation Unit.
- **Land Adjudication Committees:** land Adjudication Committees (LACs) are a traditional legal institution implemented only when there is conflict over land ownership.
- **Sector / Cell Land Committees:** Sector and Cell level Land Committees liaise with the District Land Bureaus and play a role in public awareness rising, including facilitating extensive consultation with the affected people.
- **Local Resettlement Committees:** a number of Local Resettlement Committees (LRCs) will be also set-up by the District Land Bureaus at the sector, cell and village levels as appropriate. The LRCs will participate in the compensation, valuation and sign-off process, and play a role in reviewing grievances at the village level. They will be involved in participatory monitoring of the Project. They also play a key role in identifying potentially vulnerable households.
- **Cell Mediation Committees (*Abunzi*):** at the village (*Imidugudu*) level, there are village-level mediation committees (*abunzi*) whose work is to hear local disputes, including land disputes.

The *abunzi* have mandatory jurisdiction over land disputes involving amounts less than three million Rwf (3,000,000Rwf), which covers most disputes.

5.2. National Legislations

5.2.1. Rwandan Constitution 2003 as Revised in December 2015 and amended in 2023.

The Constitution of Rwanda, Article 16 stipulates that all Rwandans are born and remain equal in rights and freedoms. Any form of or propaganda for discrimination, including on the basis of ethnicity, family or descent, clan, skin color, sex, region, social status, religion or belief, opinion, wealth, cultural differences, language, economic status, physical or mental disability or any other form of discrimination are prohibited and punishable by law.

Rwandan Constitution recognizes that every person has a right to private property. Everyone has the right to private property, whether individually or collectively owned. Private property, whether owned individually or collectively, is inviolable and the right to property shall not be encroached upon except in public interest and in accordance with the provisions of the law, (Article 34).

Under Article 35, it is stipulated that private ownership of land and other rights related to land are granted by the State. The law specifies the modalities of acquisition, transfer and use of land. Exceptionally, the right to property may be overruled in the case of public interest. In these cases, circumstances and procedures are determined by the law and subject to fair and prior compensation. Laws on property are also found in various legal texts of Rwanda. Eligibility for compensation is also enshrined under the Rwandan constitution and the Expropriation Law in public interest.

Laws on property are also found in various legal texts of Rwanda. Eligibility for compensation is also enshrined under the Rwandan constitution and the Expropriation Law. The property of the State comprises of public and private property of the central Government as well as the public and private property of decentralized local government organs (Article 31). Article 32: Right to collective bargaining, Article 35: Right to private ownership of land, Article 51: Welfare of persons with disabilities and other needy persons whereby (1) The State has the duty to establish special measures facilitating the education of persons with disabilities. (2) The State also has the duty, within its means, to undertake special actions aimed at the welfare of persons with disabilities.

(3) The State has also the duty, within the limits of its means, to undertake special actions aiming at the welfare of the needy, the elderly and other vulnerable groups. From the above national

constitutional provisions, this ARAP is compliant with mainly for the right for private ownership of land, collective bargaining related to the grievance management between the citizens and all of the rights as enshrined in the constitution are considered during the preparation of this ARAP.

5.2.2. Land Tenure Legal Provisions in Rwanda

Although the Organic Land Law provides two types of formal land tenure: full ownership/ freehold and long-term leasehold, all land in Rwanda belongs to public entities: The State, the Cities and the Districts. "Public land" is reserved for public use or for environmental protection. "Private land" can be allocated by its public owners (State, Cities and District) to natural or legal persons. It then becomes "individual land". It is leased through a lease contract and against payment of an annual lease fee. The lessee obtains an ownership certificate (Emphyteutic Lease Contract and Certificate or Full Ownership Title) (Ministry of Environment, 2012).

This ARAP might need compensation for individual and community properties owners in case this specific asset is permanently acquired for the purpose of grid reliability. The Organic Land Law recognizes existing rights, whether written or unwritten, under both civil law and customary practices through new national land tenure arrangements. Efforts have been made to formalize land ownership, especially those acquired through customary means.

5.2.3. National Land Policy, 2004

The Policy is premised in the National Development Strategy of Rwanda. Its main objective is to put in place and operationalize an efficient system of land administration and land management that secures land ownership, promotes investment in land for socio-economic development and poverty reduction. The policy provides for land tenure systems, guiding principles of land management, an effective & efficient land registry, and land transactions. According to the National Land Policy, all Rwandese enjoy the same rights of access to land, implying no discrimination against women. All land should be registered for security.

5.2.4. National Gender Policy, 2010 Revised in 2021.

The National Gender Policy states that the Rwandan society is free from all forms of gender-based discrimination and see both men and women participate fully and enjoy equitably from the development processes. The main mission of this policy is to contribute to the elimination of gender inequalities in all sectors of national life, in order to achieve the nation's goal for sustainable

development. Priority Area 2: Accelerate women's economic empowerment in the objective 8: Guarantee a conducive legal framework that takes into account Rwanda's socio-cultural context especially focusing on property rights for women in informal unions. For the policy action 2.1.3. Design men and boys engage programs focusing on challenging negative masculinities, engaging participation of couples, increasing men's role in positive parenting to ensure gender responsive mindset towards a shared responsibility, use and control of assets and resources from and for investment.

Resettlement activities for this ARAP will involve and affect both men and women in terms of loss of property and both genders are expected to be treated equally in sharing the compensation amount or other accompanying measures relating to the relocation and resettlement following the acquisition of land and properties in the right of way of the electricity extension construction activities. Both men and women will be the signatories of the account where the compensation of entitlement will be deposited.

5.2.5. Law N°43/2013 of 16/06/2013 Governing Land in Rwanda

The Organic Law No. 03/2013/OL of 16/06/2013 repealing the Organic Law No 8/2005 of 14/07/2005, determines the use and management of land in Rwanda. It provides for the land use consolidation in Rwanda. This law governs land in Rwanda. It also institutes the principles that are to be respected on land legal rights accepted on any land in the country as well as all other appendages whether natural or artificial. Organic Land Law categorizes land via two criteria: (1) Land Use and (2) Land Ownership. Land Use (Article 9) is split into two categories: urban lands and rural lands.

Land ownership is divided into the following categories: individual owned lands and State lands (whether urban or rural). Article 10 provides that individual land is comprised of land acquired through custom, written law. That land has been granted definitively by competent authorities or acquired by purchase, donation, inheritance, succession, ascending sharing, and exchange or through sharing.

Article 11 provides that public land consists of land in public and private domain of State, land belonging to public institutions and land that belongs to local authorities whether being in their public domain or in their private domain. It also states that the State may donate to any public institution or local authority its land reserved for public or private domain.

5.2.6. Law N° 32/2015 of 11/06/2015 Relating to Expropriation in the Public Interest

The Law determines the procedures relating to expropriation in the public interest, Article 3 of this law notes that, ‘No person shall hinder the implementation of the program of expropriation in the public interest on pretext of self-centered interests. Article 17 states that after the publication of a decision on expropriation in the public interest, complete with a list of holders of rights registered on land titles and property incorporated on land, landowners shall not develop any long-term activities on the land, otherwise such activities shall not be compensable during expropriation.

In terms of valuation, Article 22 states that land values and prices for property consistent with the prevailing market rates shall be established by the Institute of Real Property Valuers in Rwanda. According to Article 26 land titles must be produced as evidence of ownership, and evidence of marital status as applicable. Any persons dispossessed of land, or unlawfully occupying land, or having developed activities prohibited after the enactment of relevant laws shall receive no compensation.

Article 27 reaffirms that compensation for land must include any improvements on the land and compensation for disruption associated with expropriation. Article 28 notes that the value of land and property should be calculated on the basis of size, nature and location and the prevailing market rates. The compensation for disruption caused by expropriation to be paid to the expropriated person shall be equivalent to five percent (5%) of the total value of his/her property expropriated.

Article 32 refers to sign-off by the owner once he/she is satisfied with the valuation. Article 33 allows for any person not satisfied with the valuation to contest in writing within seven days. Any person contesting the assessed value must engage the services of a valuer or a valuation firm recognized by the Institute of Real Property Valuer in Rwanda, at their own expense, to carry out a counter-assessment of the value. Under Article 34 if unsatisfied the matter may be referred to the courts. However, the compensation will be paid pending the court decision so as not to delay expropriation.

In terms of payment of compensation, Article 35 notes that, ‘fair compensation can be paid in monetary form in the Rwandan currency or in any other form mutually agreed upon by the expropriator and the person to be expropriated’. The fair compensation must be paid to the expropriated person before he/she relocates.

Article 36 notes that compensation must be paid within 120 days of approval by the Ministry, or otherwise becomes null and void, unless mutually agreed otherwise. After payment, the affected person has a further 120 days to relocate. During this period, they should not plant any crops that would take more than 120 days of growth before harvesting. Article 38 stipulates that compensation shall be deposited into a bank account with a recognized locally based bank or financial institution.

Eligibility for compensation is enshrined under the Rwandan constitution (article 29) and the expropriation law. The two laws regulate and give entitlement to those affected, whether or not they have written customary or formal tenure rights. The person to be expropriated is defined under article 2 (7) of the expropriation law to mean any person or legal entity who is to have his or her private property transferred due to public interest, in which case they shall be legally entitled to payment of compensation.

Compensation entitlement: In case an individual suffers any loss, Article 3 of the expropriation law stipulates that he or she should receive just compensation for it, although it is not clear what comprises fair and just compensation, this being left to the judgment of independent valuer. Article 4 of this law also stipulates that any project which results in the need for expropriation for public interest shall provide for all just compensation in its budget. Through mutual arrangement, both parties can determine the mode of payment.

Article 22 (2) of the expropriation law provides that through an agreement between the person to expropriate and the one to be expropriated, just compensation may either be monetary, alternative land or a building equivalent as long as either option equates to fair and just monetary compensation. In case the determination of 'just' compensation exceeds in value the alternative land given to the expropriated person, the difference will be paid to the expropriated person.

Furthermore, the law deals with valuation of land earmarked for expropriation. The law identifies properties to be valued for just compensation to be land and activities that were carried out on the land including different crops, forests, buildings or any other activity aimed at efficient use of land or its productivity. Here the law is silent on access to economic activities on the land. The new law has added 5% of total compensation fees for disturbance allowances.

5.2.7. Law n°17/2010 of 2010 Establishing and Organizing the Real Property Valuation Profession in Rwanda (IRPV)

This law provides for the registration of land in Rwanda and conditions for registration. The law also allows the government to conduct valuation when mandated by their government institutions. Articles 27, 29, 30 and 31 of the law deals with valuation methods. These articles stipulate that price for the real property shall be close or equal to the market value. The valuation could also compare land values country wide. Where sufficient comparable prices are not available to determine the value of improved land, the replacement cost approach shall be used to determine the value of improvements to land by taking real property as a reference. The law also allows the use of international methods not covered in the law after approval from the institute of valuer council. This law shall be applied during the valuation of the properties where the certified independent valuer shall be certified in accordance with this law and shall be provided by the same institute.

5.2.8. Ministerial order N° 001/2006 of 2006 determining the structure of land registers.

The ministerial order determines the structure of lands registers, the responsibilities and functioning of the District Land Bureau (DLB). This ministerial order determines the structure of land registers, the responsibilities, and the functioning of DLB. The responsibilities of the land bureau include among others to implement land registration and manage land and update, safely keep records of land registers, and monitor and approve activities pertaining to valuation of land, other immovable property and demarcate and approve land cadastral. This order does not apply to land specified in articles 12, 14, 15 and 72 of the organic law n° 8/2005 of 14/07/2005 determining the use and management of land in Rwanda.

5.2.9. The legislative framework of social protection in Rwanda

In order to reduce poverty among the population and to achieve Sustainable Development Goals (SDGs), the Government of Rwanda elaborated and is implementing different schemes and interventions in the social protection sector. This sector has developed and evolved a great deal in the last 15 years, with an increasing role to play in poverty reduction. After elaborating a social protection policy in 2020 and National Social Protection Strategy (2011) and having commissioned a Public Expenditure Review (PER) in 2006, the Government identified social protection as one of the priority sectors in the National Strategy for Transformation (2017-2024).

Various programmes have been set up by different institutions to contribute to poverty reduction and the improvement of Rwandans' living conditions. In the health sector, different schemes co-exist and complement one another. For the formal sector, the Rwanda Health Insurance Scheme (RSSB), Military Medical Insurance (MMI) and private insurance companies cover, respectively, the civil servants, members of the Rwanda Defense Force and their immediate families, and employees of private companies. All formal-sector workers are also part of the Rwanda Social Security Board (RSSB) for occupational hazards. The informal sector and rural populations are members of other schemes, called community-based health insurance schemes (CBHI) (*mutuelles de santé*). In the education sector, all Rwandans can benefit from free basic education (Twelve years).

In addition to these schemes, there are some other social transfers. Among them, formal sector employees contribute for their pension. A flagship programme was also developed as part of the Rwanda Economic Development and Poverty Reduction Strategy: the Vision 2020 *Umurenge* Programme (VUP). It has three components: public works, direct support and financial services. This Programme has shown results in reducing poverty among beneficiaries. Another Rwandan initiative is the *Ubudehe* programme and approach (community targeting/classification through social mapping). To support the genocide survivors, the Fund for the Support and Assistance to the Survivors of the Genocide against the Tutsis and Other Crimes against Humanity was established and supported them in different areas (housing, education, health, social assistance, income-generating activities). To contribute to the reintegration of demobilized soldiers, the Rwanda Demobilization and Reintegration Commission has developed programmes to support this specific group. A project also contributed to the improvement of livelihoods, soil fertility and nutrition status through providing a dairy cow to poor families.

Other vulnerable groups such as the disabled and orphans and vulnerable children are also targeted by some of these interventions and benefit from other interventions. There are different coordination mechanisms at different levels in Rwanda to improve the efficiency and impact of interventions in the social protection sector.

5.2.10. Rwanda Energy Policy, 2015

The following principles summarize Government's guiding approach to energy development. They reflect a need to balance and protect the interest of citizens and energy consumers, private investors, and

other stakeholders. They give high-level policy prescriptions on how Rwanda's energy resources should best be exploited, distributed, and utilized. These foundational principles promote an enabling environment for successful achievement of commitments reflected in the ESSP and future sub-sector action plans in the development of specific policy directives and guidelines.

The principles are: Building decentralized energy policy implementation capacity, Promote value-for-money and increased market competition in energy development, "Smart" subsidies aligned to social protection principles, Private operation of government owned power plants, Promoting private sector participation.

5.3. Other Relevance Orders

5.3.1. Ministerial Order No. 001/2006 Determining the Structure of Lands (2006)

This ministerial order determines the structure of Land Registers, and the responsibilities and functions of the District Land Bureau. The responsibilities of the land bureau include among others to implement land registration, keep land registers, monitor and approve activities pertaining to valuation of land and property, and demarcate and approve land cadastral maps. Rural populations with customary land rights are being encouraged to register their land through these institutions.

5.3.2. Presidential Order No. 54/01 (2006)

This presidential order determines the structure, the responsibilities, the functioning and the composition of Land Committees. Article 9 of the order gives the office of the land committee independence in the discharge of its daily technical duties. Therefore, it receives no instructions from any other organ.

5.3.3. Ministerial Order No. 002/2008 Determining Modalities of Land Registration (2008)

The Ministerial Order includes dispute resolution procedures in relation to land registration, including the use of a Cell Land Adjudication Committee (LAC). The LACs are comprised of five members, supplemented by five members of the village (imidugudu) where demarcation and adjudication is taking place. The cell executive secretary acts as the LAC secretary, although he or she has no voting rights.

Article 17 grants parties to a dispute the right to take that dispute to the LAC. Where disputes are resolved with the assistance of the LAC, the parties are bound by that agreement, and may not later raise the issue. Article 20 provides procedures for the LAC when hearing disputes, including that the hearing is open to the public and announced eight days in advance.

5.3.4. Law No 52/2018 of 13/08/2018 governing electricity in Rwanda

This Law governs activities of electric power production, transmission, distribution, and trading within or outside the national territory of the Republic of Rwanda. Under this law, there is an establishment of a Universal Access Fund whose main purpose is to optimize access to electricity in all areas of the country through cost-effective means and minimized support. A Presidential Order determines the functioning of the Universal Access Fund.

With regards to the Right of Way, Art 47 provides for authorization to operate in a public or a private domain to be granted for electricity transmission or distribution license holder. However, Art 48 provides for an Expropriation of the right of way for the public interest. The right of way is necessary for the operators in the production, transmission, distribution, and supply of electricity. It shall be exercised by the standards set by the regulatory agency. Expropriation shall be conducted by the Law governing expropriation for public interest.

5.4. AfDB Integrated Safeguards System Handbook (2013)

The AfDB has developed an Integrated Safeguard System (ISS) in order to better articulate its safeguard policies while improving their clarity, coherence and consistency.

Operational Safeguards (OS) 1 requires the preparation of an Environment and Social Management Framework (ESMF) or Environmental and Social Impact Assessment (ESIA), which establishes a mechanism to determine and assess potential environmental and social impacts of any Project. OS

from 2 to 5 support the implementation of OS 1 and set out specific requirements relating to different environmental and social issues, including gender and vulnerability issues that are triggered if the assessment process reveals that the program may present certain risks.

Social risks and impacts, including: (i) impacts on peoples way of life, their culture and communities (including from a legacy perspective); (ii) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (iii) risks that project impacts fall disproportionately on individuals or groups who, because of their particular circumstances, may be vulnerable;¹⁸ (iv) any prejudice or discrimination toward individuals or groups in providing access to development resources and (project) benefits, particularly in the case of those who may be vulnerable; (v) negative economic and social impacts relating to the involuntary land acquisition or restrictions on land access and use; (vi) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vii) impacts on the health, safety and well-being of workers and project-affected communities; and (viii) risks to cultural heritage.

The E&S operational safeguards highlighted in the AfDB's ISS were considered in this electricity project, taking into account its potential to trigger some of these safeguards.

Operational safeguards (OS1) will be triggered because the electricity project will have different environmental and social impacts on the environment and the human community. Activities of Medium Voltage construction may pose minor environmental and social risks. The project risks will be managed throughout the implementation of mitigation measures prescribed in submitted Resettlement Policy Framework developed for the project prior to appraisal.

5.4.1. African Development Bank Involuntary Resettlement Policy, 2003

5.4.1.1. Policy Goal, Objectives, and Guiding Principles

The primary goal of the involuntary resettlement policy is to ensure that when people must be displaced, they are treated equitably, and that they share in the benefits of the project that involves their resettlement. The objectives of the policy are to ensure that the disruption of the livelihood of people in the project's area is minimized, ensure that the displaced persons receive resettlement

assistance so as to improve their living standards, provide explicit guidance to Bank staff and to borrowers, and set up a mechanism for monitoring the performance of the resettlement programs. Most importantly, the abbreviated resettlement plan should be prepared and based on a development approach that addresses issues of the livelihood and living standards of the displaced person as well as compensation for loss of assets, using a participatory approach at all stages of project design and implementation.

Compensation at the full replacement cost for loss of lands and other assets should be paid prior to projects implementation with the view to improve the former living standards, income earning capacity and production levels of the affected population. The improvement of these living standards should also apply to host communities. In addition, the needs of disadvantaged groups (landless, female headed households, children, elderly, minority ethnic, religious and linguistic groups, etc.) must be at the center of the development approach.

Economic benefits and costs should be applied to determine project feasibility with regard to resettlement. The full costs of resettlement activities necessary to achieve the objectives of the project should be included in the total costs of the project. The costs of resettlement like the costs of other project activities are treated as a charge against the economic benefits; and any net benefits to resettlers (as compared to the “without-project” circumstances) should be added to the benefits stream of the project.

Economic and social considerations should be taken into account in determining the requirements for compensation. Under the present policy, only displaced population having formal legal rights to land or assets and those who can prove entitlement under the country’s customary laws are considered and will be fully compensated for loss of land or other assets. However, a third category of displaced persons who have no recognizable legal right or claim to the land they are occupying in the project area will be entitled to resettlement assistance in lieu of compensation for land. Nevertheless, at the minimum, under the Bank’s policy (with no contradiction to the borrower’s legislation), land, housing, and infrastructure will be provided to the adversely affected population, including indigenous groups, ethnic, religious and linguistic minorities, and pastoralists who may have usufruct rights to the land or other resources taken for the project.

The borrower (Government of Rwanda) will be required to prepare a full resettlement plan (FRP) for any project that involve a significant number of people (200 or more persons) who would need to be

displaced with a loss of assets, or access to assets or reduction in their livelihood. The full replacement plan will be released as a supplement document to the Environmental and Social Impact Assessment (ESIA) summary for Bank's financed projects involving involuntary resettlement issues. For any project involving the resettlement of less than 200 persons, an abbreviated resettlement plan will be released together with the environmental annex of the Bank's Appraisal Report. The full resettlement plan and the abbreviated resettlement plan (refer to as resettlement plan) should be posted in the Bank's Public Information Center (PIC) and the Bank's web site for public review and comments in accordance to the Bank's disclosure policy and the Bank's Environmental and Social Assessment Procedures (ESAP 2001). For this specific sub-project of construction of MV and LV electrical lines and households connections as it will not imply land acquisition and relocation of the PAPs, the abbreviated resettlement action plan (ARAP) is being developed to include guiding principles for the expropriation and compensation process.

5.4.2. Environmental and Social Operational Safeguard (2018)

5.4.2.1. OS2: Involuntary resettlement: land acquisition, population displacement and compensation

Projects often necessitate land acquisition, expropriation and/or restrictions on land use, resulting in the temporary or permanent resettlement of people from their original places of residence or their economic activities or subsistence practices. When affected persons and communities do not have the choice to refuse such displacement, this process is known as involuntary resettlement.

The complexity of displacement must be duly appreciated, and its impact and remedy carefully analyzed, planned and delivered as it may negatively affect the economic and social well-being of PAPs and provoke severe economic and social problems in the origin and host communities. Income sources can be irreparably lost, people can be relocated to environments where their skills may be less applicable and monetary compensation may not be sufficient to prevent long-term hardship or disadvantage.

Project-induced involuntary resettlement should be avoided by analyzing alternative project designs and locations. If it is unavoidable, the promoter, with full involvement in the decision-making process of all stakeholders, and particularly the affected people, should adopt adequate steps to minimize and mitigate its adverse impacts from an early stage. Resettlement is a process to assist those displaced

to replace their housing, assets, livelihoods, land, access to resources and services and to improve or at least restore their socioeconomic and cultural conditions to those levels existing prior to the project.

5.4.2.2. AfDB Gender policy

The policy requires that gender analysis be an integral part of all Bank's intervention in order to ensure that such interventions respond to the needs and priorities of both men and women. This requirement is based on the premise that the absence of specific attention to differences between women and men has been shown to result in the exclusion of women or men as participant or beneficiaries of planned change.

This policy promotes a shift away from the tendency of focusing on women empowerment without taking into account their relations with men, since this often undermines the very objective of reducing disparities.

5.4.2.3 The African Development Bank Group Gender Strategy 2021 – 2025 Investing in Africa's women to accelerate inclusive growth.

The Bank like other international development institutions recognizes that gender equality and women and girls' empowerment is not only a critical human rights issue for women and girls, but also a prerequisite for the achievement of broader development goals, effective humanitarian response and sustainable peace and security. Therefore, due to the persistent challenges that hinder women's economic empowerment in Africa, the Bank has increasingly focused on mainstreaming gender in its operations to ensure gender equality and women and girl's empowerment at regional and national levels.

The investing in women's economic empowerment sets a direct path towards gender equality, poverty eradication and inclusive economic growth. Women make enormous contributions to economies, whether in businesses, on farms, as entrepreneurs, employees and as leaders. Women entrepreneurs represent close to 30% percent of formally registered SMEs in Africa and with the right access and skills have the capabilities of creating jobs for women as well as men. However, they lack access to adequate financing, skills and the value chains, which hampers their ability to fully participate in the development and growth of our economies. This specific sub-project in RUHANGO and NYANZA Districts will help to diversify the creation of the job for both men and women for better future of the beneficiaries in different commercial center and other business development.

5.5. The World Bank (WB) ESF-ESS 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.

5.5.1. Key ESS5 requirements

The Standard requires that resettlement plans are implemented before any project-related impacts on project affected people. Therefore, the land acquisition, displacement or any restriction of access should not occur before necessary measures for resettlement and compensation are in place. For NYANZA and RUHANGO sites involving land acquisition temporarily or expropriation of the affected assets, it is further required that these measures include provision of compensation and/or other assistance to the PAPs, prior to remove their assets where required. In particular, the taking of land and related assets may take place only after compensation has been paid where applicable. All project activities requiring relocation, loss of shelter or other impacts, the policy requires that measures to assist affected persons are implemented in accordance with the project resettlement action plans, the policy aims to have a fair and transparent process. Where there is a conflict between the Laws of Rwanda and the WB ESS5, the latter will take precedence because the Bank is to fund the project activity. The same approach shall be applied for this specific project because the construction of MV Lines and their accessories requires the taking of land temporarily and damage some properties or assets as assessed, this has been identified during the consultation meeting with NYANZA and RUHANGO Districts and local community, given that the project will temporarily use the land belong to the people.

5.6. International Finance Corporation Performance Standards

5.6.1. Key requirements

Performance Standard 5 on Land Acquisition and Involuntary Resettlement recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restrictions on land use.

Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement. This occurs in cases of (i) lawful expropriation or temporary or permanent restrictions on land use

and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail. Under this specific project, EDCL has negotiated with the property owners on the price of the crops and trees as per law stipulations.

5.7. Abbreviated Resettlement Action Plan

Displaying due regard for the equal protection of women and vulnerable groups or minority rights, the ARAP delineates measures to:

- Mitigate the negative impacts of resettlement and identify potential development benefits.
- Assure that the rights and interests of PAPs are respected and protected, in particular those deemed vulnerable.
- Establish the entitlements of all categories of affected people, including the host communities.
- Introduce any additional accompanying measures for vulnerable affected persons, if relevant.
- Document all compensation measures and relocation activities.
- Establish procedures to document all compensation measures and relocation activities and guarantee due process to the affected people, such as meaningful consultation, adequate information to the PAPs and sufficient notice before eviction, together with a free and independent grievance mechanism; and
- Establish organizational arrangements and procedures to monitor the implementation of resettlement plans and take corrective actions as necessary.

According to AfDB, at a minimum, the ARAP should:

- State the resettlement guiding principles and objectives.
- Describe the nature and magnitude of project impacts and identify all people to be displaced, paying special attention to vulnerable groups;
- Carry out a census to establish the number of people to be displaced, livelihoods affected, property to be compensated and the cut-off date for eligibility claims.
- Describe the legal framework expected to guide this Plan's land acquisition (when applicable), compensation, resolution of conflicts and appeals procedures.
- Include an analysis of applicable national legislation, highlighting gaps with AfDB requirements and required bridging measures.
- Propose how to fill the gaps between national law and AfDB requirements should such gaps be identified.

- Describe institutional set-up and responsibilities.
- Establish the eligibility criteria and describe the entitlements for all categories of displaced people and types of impacts suffered.
- Describe how affected populations, including women, minorities, and other vulnerable groups, have been effectively consulted and how their views were taken into account.
- Include valuation of and compensation for lost assets and loss of income and demonstrate that these rates are adequate, i.e. at least equal to the replacement cost of lost assets/income or meeting minimum average wage thresholds.
- Provide details of sustainable arrangements for improving living of displaced persons.
- Provide details of sustainable arrangement for improving or, at minimum, restoring livelihoods.
- Prepare a grievance mechanism for the settlement of disputes arising from resettlement related issues ensuring access to grievance and recourse for all affected persons; and,
- Include implementation schedule, budgets, and arrangements for monitoring and evaluation.

It should be noted that an RPF was indeed done, and that this ARAP follows the steps indicated in the developed and disclosed RPF, and that it is available on AfDB's website (<https://www.afdb.org/en/documents/rwanda-rwanda-transmission-system-reinforcement-and-last-mile-connectivity-p-rw-fa0-009-rpf-final-report>).

5.7.1. Implementation and Monitoring

The promoter shall set up necessary systems (i.e. resources, staff, and procedures) to monitor the implementation of an ARAP on a regular basis and take corrective action as necessary. Affected persons will be consulted as part of the monitoring activities. The implementation and effectiveness of the resettlement action plan shall be subject to monitoring and review by qualified resettlement specialists and/or other independent third parties where deemed necessary as appropriate and commensurate to the scale and risks involved in the resettlement.

Implementation of an ARAP will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan and requirements outlined in this ARAP.

CHAPTER VI: GAPS BETWEEN RWANDAN LEGISLATIONS AND THE AfDB ISS

The analysis of the legislations showed that the project will face minor discrepancy between different legislations. Therefore, it was relatively crucial to present the gaps between various legislations and the mechanism that will be adopted by REG-EDCL in order to bridge those gaps.

6.1 Identified gap between AfDB and National Legislation

The below table demonstrates the gap identified between national legislation and AfDB policies as below shown, the column ‘Status’ identifies whether the topic is relevant, i.e. present, or non-present to the components of the project.

Table 9: Comparison of Rwandan regulations with the AfDB ISS requirements and measures for bridging the gaps.

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
Objective of involuntary resettlement	Expropriation law in public interest of 2015 determines procedures relating to expropriation in the public interest. Article 3: on powers to order expropriation in the public interest par. 3 states that no person shall hinder the implementation of the program of expropriation in the public interest on pretext of self-centered interests.	Avoid involuntary resettlement where feasible, or minimize resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored;	The AfDB Safeguards explicitly requires that involuntary resettlement should be avoided or at least minimized by considering alternative project design.	AfDB ISS
Consultation and Information Disclosure	Article 24 of expropriation law stipulates that communication to the persons to be expropriated of the start date of valuation of land and property incorporated thereon.	Resettlement activities must be planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected including host	The affected community was informed on the project's activities and their right during the project implementation process where they can voice their concerns for any	Rwanda expropriation law and AfDB ISS

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
	<p>Such a communication shall be made through an announcement posted on the office of the Cell of the place designated for the implementation of the project. The communication shall also be made through at least one radio station with a wide audience in Rwanda and at least one of Rwanda-based newspapers with a wide readership for the relevant parties to be informed thereof. If necessary, use shall be made of any other means of communication.</p>	<p>communities in decision-making.</p> <p>The perspectives of women, minority groups and other categories with special requirements must be obtained and their interests factored into resettlement planning and implementation.</p> <p>AfDB encourages consultation, Participation and Broad community support as seen in AfDB Operational safeguard-2</p>	<p>administrative entity such that they participate in the project planning up to completion stage for sustainability.</p>	
Property Valuation	<p>Valuation is covered by the Expropriation Law in public interest and the Land Valuation</p>	<p>For the AfDB, those people whose livelihoods are negatively affected by a project</p>	<p>The REG-EDCL is required to calculate the compensation value throughout the life of the</p>	<p>National law and AfDB ISS</p>

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
	<p>Law stipulates that the affected person receive fair and just compensation.</p> <p>However, a ministerial order gives the value of land and crops</p>	<p>should have their livelihoods improved or at minimum restored and/or adequately compensated for any losses incurred. As such, where physical or economic displacement is unavoidable, the AfDB requires the promoter to develop an acceptable Resettlement Action Plan. The plan should incorporate and follow the right to due process, and to meaningful and culturally appropriate consultation and participation, including that of host communities.</p> <p>In cases of loss of land for households with land-based livelihoods, affected people</p>	<p>project (excavation, construction, and operation); with full replacement cost, in accordance to the market value at the time of compensation.</p> <p>In case of providing cash compensation, REG-EDCL has to ensure that the value of the crops and trees is equivalent to the market price. This is in order to be consistent with the “full replacement cost requirement.” Replacement cost" refers to the value determined to be fair compensation for: (i) land, based on its productive potential; (ii) houses and structures, based on the current market price of building</p>	

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
		<p>must first be offered alternative land of better or equal quality. In cases of loss of housing, compensation for houses and other structures should be equivalent to replacement cost plus relocation costs. Depreciation of assets or the value of salvage materials shall not be deducted from the value of replacement cost. Where the option of cash compensation or alternative accommodation is provided, the cost estimates for providing alternative accommodation could be used for calculating cash compensation payable. For movable structures, such as kiosks or stalls, comparable</p>	<p>materials, and labor without depreciation or deductions for salvaged building material, and (iii) residential land, crops, trees, and other commodities, based on their market value. Such cost needs to be further accounted for in case of any removal costs, utility connection costs, taxation costs imposed on new housing/re-established businesses etc. Where markets do not exist, surrogate values must be determined (see AfDB Handbook 2013 standard 6, p. 54).</p>	

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
		<p>replacement sites should be offered. A good practice is to calculate replacement cost for such structures as the cost of alternative sites, the cost of replacing improvements (such as foundations), and relocation expenses or other transaction costs.</p>		
The cut-off date	There is no provision on cut-off date under the Rwandan laws.	<p>It identifies a cut-off date in order to prevent people influx to the project area. This measure is stipulated in order to protect the project owner and to prevent wasting of resources. The Rwandan laws never set a cut-off date. The cut-off date is the day the census starts.</p>	<p>The potential date for the start of the construction and rehabilitation is 16/05/2023 which is considered the cut-off date. Construction and rehabilitation activities will start after completing the compensation activities. It is important to note that the project implementation will start with a cut-off date, after</p>	AfDB ISS

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
			approval from the AfDB. The public disclosure of the project is done through the stakeholder engagement sessions and notify the property owners in project area; given to their ability to communicate directly with landowners.	
Compensation and eligibility	Article 22 of the expropriation Law N° 32/2015 of 11/06/2015 entitles the landholder to compensation for the value of the land and activities on the basis of size, nature and location in reference to the prevailing market value. Article 26 of the expropriation law requires the person who owns land intended for expropriation to provide	Eligibility Criteria for compensation under AfDB (a) those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country); (b) those who do not have formal legal rights to land, at the time the census begins, but have a claim to such land or assets; provided that such	The categories of people who must be compensated under Rwandan legislation are narrower than those defined under AfDB. Under this project all the categories (a,b,c) will be considered for compensation in accordance to AfDB Resettlement assistance should be provided in order to improve the PAPs livelihoods or at least	AfDB ISS

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
	<p>evidence of ownership or rights on that land and presents a certificate to that effect.</p> <p>Expropriation law is silent on provision of alternative land and resettlement of those to the pre-displaced status</p>	<p>claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan.</p> <p>(c) those who have no recognizable legal right or claim to the land they are occupying.</p> <ul style="list-style-type: none"> • To determine eligibility: • Carry out resettlement census. <p>Cut-off date for eligibility is the day when the census begins.</p>	<p>to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p> <p>Accordingly, individuals under category a, and b, should be compensated at full replacement cost and AfDB requires payment prior to acquisition.</p> <p>While those who are using land but have no recognizable legal rights or claim (i.e. individuals under category c) will be compensated for their investments on the land to improve their livelihoods or at least to restore to pre-displacement levels or to levels</p>	

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
			prevailing prior to the beginning of project implementation, whichever is higher.	
Calculation of Compensation	According to prevailing prices in the affected area and assessed by IRPV for that purpose	Full replacement cost	EDCL-REG should build their estimation on full replacement cost to be adopted to the AfDB Operational Safeguard. Third party (IRPV)/objective evaluation is necessary	AfDB ISS
Vulnerable groups among the PAPs	Rwandan regulations have not addressed how vulnerable groups affected by expropriation of property should be treated	The AfDB OS stipulates the importance of paying attention to the minority rights and non-discrimination. Minority protection and participation are inherent in the EU's founding principles and in the principles of subsidiarity. The evolution of human rights protection has strengthened anti-	Poor marginalized people and those with handicaps have to be engaged in the project by inviting them to the stakeholder engagement activities and consultations. REG-EDCL needs to conduct a social survey covering the entire MV line to identify all vulnerable groups. The impacts	AfDB ISS

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
		<p>discrimination legislation particularly with respect to women and to employment. Similar protection remains to be developed for ethno-cultural diversity. Protection of minorities and indigenous peoples is limited to dealings with external partners.</p>	<p>of the project have to be assessed so to inform REG-EDCL of the compensation and assistance that will be provided to vulnerable groups. Such social survey should be developed in this ARAP to identify all vulnerable groups. Specifically, site visits have to be paid to the vulnerable groups in order to inform them about the project and its positive and adverse impacts. Additionally, they are to be informed about the grievance mechanism and given the contacts of the compensation committee in order to get the needed information.</p>	

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
Access to timely and relevant information	Rwandan law stipulates that PAPs be provided with timely and relevant information at each stage of the project	AfDB OS 4 on Stakeholder Engagement P.89 focuses on that “the timely disclosure of relevant project information enables stakeholders to understand the project’s risks, impacts and opportunities. Mindful of this and as foreseen in the Stakeholder Engagement Plan, the promoter will provide identified stakeholders with relevant information in a timely and appropriate manner. The promoter will further disclose and grant access to relevant information to any other interested party as appropriate.	EDCL-REG launched comprehensive Stakeholder engagement activities that will continue along the life of the project. Integration of PAPs will be the key to provide satisfactory level of information.	AfDB ISS
Grievances Redress Mechanisms	The Expropriation Law in public interest of 2015 creates the Resettlement and	The Grievance Mechanism according to AfDB OS 2 on Involuntary Resettlement p. 59	It is essential for the EDCL-REG to establish a GRM that is acceptable and accessible to	AfDB ISS and National legislation

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
	<p>Grievance redress committee and provides complaints procedures for individuals dissatisfied with the proposed project or the value of their compensation and process for expressing dissatisfaction and for seeking redress.</p>	<p>is “The promoter shall set up and maintain a grievance mechanism that is independent. It should enable the promoter to receive and resolve specific grievances related to compensation of affected persons or members of host communities and use the grievance log to monitor cases and improve the resettlement process.</p>	<p>community members. It would serve as the first stop for people who have a grievance and will have several channels for them to complain. They should be informed that they can take the case to the court If need arises, aggrieved people will however remain free to open a Court case without having registered their grievance with the GRM. The grievance mechanism should be set up and maintain in line with the OS 4 of the AfDB.</p>	
Monitoring and Evaluation	<p>The absence of monitoring and evaluation measures in Rwandan laws illustrates differences between the two systems. The lack of legally</p>	<p>According to AfDB OS 4 on Stakeholder Engagement P. 92 the engagement with stakeholders during the life of a project is a dynamic and</p>	<p>REG-EDCL is to develop an M&E and reporting system for the project that is to the satisfaction of the AfDB. This is to ensure that the monitoring</p>	AfDB ISS

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
	<p>authorized resources can constrain accountability and governance mechanisms of AfDB financed projects. The lack of equivalency between the AfDB's and Rwandan policy can negatively impact on the very idea of the consultation, decision making and disclosure principles.</p>	<p>challenging process. Promoters are required to monitor the implementation of the stakeholder engagement plan and the performance of the grievance mechanism and report on both. In accordance with as an integral component of a project's Environmental and Social Management System, monitoring and reporting procedures must be established early in the operation by the promoter.</p> <p>In terms of monitoring, the promoter will arrange for all necessary provisions to assure stakeholder engagement during the monitoring phase. Thereby, the promoter will endeavor to</p>	<p>and reporting that is to take place is done according to AfDB Operational Safeguard.</p>	

Principles	Rwandan legislative requirements	AfDB policy requirement	Measures for bridging the gaps	Action to be adopted
		<p>involve independent third parties (e.g. CSOs, NGOs, and national human rights institutions) or to facilitate community-driven monitoring, where practical and acceptable by the communities concerned.</p> <p>In terms of reporting, the promoter will establish regular communication and reporting channels back to the communities and individuals impacted and concerned, whether through non-technical summaries of progress updates, engagement activities, public meetings, targeted issue-based hearings.</p>		

CHAPTER VII: VALUATION AND COMPENSATION

7.1. Eligibility criteria of the project affected persons

Based on AfDB ISS, the eligibility and entitlements in accordance with the involuntary resettlement policy, three groups of displaced people are entitled to compensation or resettlement assistance for loss of land or other assets taken for project purposes:

- Those who have formal legal rights to land or other assets recognized under the laws of the country concerned. This category generally includes people who are physically residing at the project site and those who will be displaced or may lose access or suffer a loss in their livelihood as a result of project activities.
- Those who may not have formal legal rights to land or other assets at the time of the census/ evaluation but can prove that they have a claim that would be recognized under the customary laws of the country. This category may include people who may not be physically residing at the project site or persons who may not have any assets or direct sources of livelihood derived from the project site, but who have spiritual and/or ancestral ties with the land and are locally recognized by communities as customary inheritors. Depending on the country's customary land use rights, they may also be considered to have a claim if they are sharecroppers, tenant farmers, and seasonal migrants or nomadic families losing user rights.
- Those who have no recognizable legal right or claim to the land they are occupying in the project area of influence and who do not fall into either of the two categories described above, if they themselves or witnesses can demonstrate that they occupied the project area of influence for at least six months prior to a cut-off date established by the borrower or client and acceptable to the Bank. These groups may be entitled to resettlement assistance other than compensation for land to improve their former living standards (compensation for loss of livelihood activities, common property resources, structures and crops, etc.). Note that under this specific project, only crops and trees shall be affected by the project activities. The cut-of Date was communicated to the eligible PAPs and fixed on 02/05/2023, and this has been the date of the commencement of the inventory of the property to be affected by the project activities within the approved RoW.

7.2 Entitlements for Compensation

Entitlements for compensation will refer to the affected household as a joint entity rather than to the head of household considered as an individual. In a bi-parental family, both spouses will be considered as entitled to cash compensation and both are intended to be beneficiaries of any livelihood restoration measures based on their capability as assessed during socio-economic baseline survey. Respective procedures, e.g. confirmation of compensation agreements, will be performed in the presence of and with the signatures of both spouses; bank transfers will be made to accounts held by both spouses.

Where the household is headed by a single person, entitlements will be in the name of this individual only. In case the head of household is a child (under 14 years), the head of household would be entitled to a special support program in order to obtain the capacity to manage compensation money. Where possible, an adult relative would be asked to act as trustee. The cash compensation process will be subject to monitoring in order to ensure that the entire affected household benefits from compensation and that compensation money is used in a meaningful manner.

Project Affected Persons will be entitled to compensation and resettlement assistance that will help in the restoration of their livelihoods to at least, pre-project standards. We should note that the above principles will apply to all PAPs (whether owner, tenant, or informal dweller).

There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to the AfDB Operational Safeguard. The following are the identified groups of PAPs for this project who are entitled to mitigation/compensation:

- Temporary (complete or partial) loss of crops and trees in the construction area:
- PAPs who have formal legal ownership rights to land
- PAPs who do not have formal legal ownership rights to land but have temporary or leasing rights.
- PAPs who do not have any recognizable legal right or claim to the land: provide compensation for (complete or partial) loss of standing crops, trees, or plants within the RoW.

7.3. Category of the PAPs and Entitlement Matrix

There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to the AfDB Operational Safeguard. The following are the identified groups of project-affected persons (PAPs) for this project who are entitled to mitigation/compensation:

1. Temporary (complete or partial) loss of land, properties incorporated therein in the construction area:
 - Individuals who have formal legal ownership rights to land
 - Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights.
 - Individuals who do not have any recognizable legal right or claim to the land: provide compensation for (complete or partial) loss of land and properties incorporated therein.

It must be noted that EDCL-REG pays the compensation to the land and crops holder regardless of crops status. Although Rwandan legislation has not mention of entitlement to compensation for those who do not have legal rights, EDCL-REG pays the compensation to the crop holder regardless of their status after demonstrating the right to use the land.

2. Permanent Loss of properties incorporated there in where MV lines will be constructed.
 - The project entitlement matrix was developed based on the AfDB Operational Safeguard and the compensation will be paid according to the AfDB's regulations. It is important to note that the compensation value developed by the IRPV is based on the full market price prevailing in the official gazette.
 - In the following table, the column 'Status' identifies whether the topic is relevant, i.e. present, or non-present to the components of the project.

7.4. Valuation and Compensation

The valuation methodology of the land and crops, trees incorporated therein compensation is imperative for the ARAP study to facilitate the compensation process. Following is a discussion of the valuation process adopted per each type of loss.

The project entitlement matrix was developed based on the AfDB Operational Safeguard. It is important to note that the compensation value developed by the IRPV Certified independent valuer

is based on the full market price prevailing in the institute. After finishing the construction of LV and MV lines will not be possible to plant trees in the RoW.

Table 10: Entitlement Matrix for Affected Persons

Impact	Type of Impact/Basis for Compensation	Eligibility Condition	Entitlements	
			Compensation	Allowances
Impact on Land	Temporary loss of land due to construction of power line	Landowner identified and recorded at the eligibility cut-off date	Only activities developed on land shall be paid and the restriction on land use will be temporary as the land is in agriculture domain, hence no land is expected to be acquired under this distribution line project. Cash compensation of the affected property at current market value	Trees and crops which will be damaged, will be compensated in cash to the owners. Disturbance allowance of 5% will be provided to all PAPs with affected crops and trees. They will also have 120 days for harvesting without deduction from the compensation fees.
Impact on Standing crops	Temporary loss of crops due to construction of power line	Landowner or tenants identified, and recorded at the eligibility cut-off date	Cash compensation of the affected property at current market value	Trees and crops which will be damaged, will be compensated in cash to the owners or tenants. Disturbance allowance of 5% will be provided to all PAPs with affected crops and trees. They will also have 120 days for harvesting

Impact	Type of Impact/Basis for Compensation	Eligibility Condition	Entitlements	
			Compensation	Allowances
				without deduction from the compensation fees.
Impact on Trees	Permanent loss of trees due to construction of power line	Landowner identified and recorded at the eligibility cut-off date	Cash compensation of the affected area at current market value	Trees and crops which will be damaged, will be compensated in cash to the owners. Disturbance allowance of 5% will be provided to all PAPs with affected crops and trees. They will also have 120 days for harvesting without deduction from the compensation fees.
Impact on Community properties	Temporary and permanent due to the affected property	Churches, farmer's organizations, Community organizations and private company	Cash compensation of the affected property at current market value	Trees and crops which will be damaged, will be compensated in cash to the owners. Disturbance allowance of 5% will be provided to all PAPs with affected crops and trees. They will also have 120 days for harvesting

Impact	Type of Impact/Basis for Compensation	Eligibility Condition	Entitlements	
			Compensation	Allowances
				without deduction from the compensation fees.
Impact on vulnerable PAPs	Temporary and permanent due to the affected property	Identified Vulnerable PAPs	Cash compensation of the affected property at current market value	Priority in employment in the project while waiting for employment. In difficult cases, local administration and village leaders shall be used to judge eligibility for inclusion of affected people in other ongoing community development program such as VUP or one cow per poor family depending on magnitude of the business opportunity lost.

Source: field survey, 2024

7.5. Valuation of Assets and Compensation

As per the Valuation Law, all peoples affected by expropriation must receive fair and just compensation. The calculation of fair and just compensation is to be made by independent valuers. Without prejudice to other laws, the value of property incorporated on land to be expropriated in the public interest shall be calculated based on their size, age, nature and the prevailing market rates.

However, considering the available information, it seems that the land values prices for the land and property incorporated on the land are not yet published. In the meantime, there is an arrangement whereby the valuers determine the prices considering the prevailing market rates, approved by the district council in line with the article 9 of the Law N°32/2015 of 11/06/2015. To ensure that AfDB ISS requirements are met for valuation, these valuation methods are to be adopted for all sections of the proposed MV Lines.

7.5.1. Methodology used by the valuer

The certified valuer has used the following steps to reach out the PAPs

- Preliminary assessment and review of preliminary design of the projects.
- Review of baseline information.
- Review of policies and regulations.
- Review of previous conducted meetings and consultations with stakeholders.
- Public consultation with stakeholders especially potential PAPs and LGOs.
- Field surveys at the project sites for data and assets inventory assignment.
- Data gathering in software.
- Data processing and analysis.
- Public disclosure of the entitlements
- PAPs sign off of the files and LGOs.
- Submission of the files to EDCL.
- Delivery of the compensation to the PAPs.

7.5.2. Arrangements for Recalculation of Compensation in case of Prolonged Delay in Delivery of Compensation

In case of any prolonged delay related to the project implementation the following procedures will be applied:

- EDCL will send a letter to the IRPV, in order to get the updated land price lists. This will be during the re-inventory process.
- The Compensation Committee will inform the PAPs about the change of the prices. They should sign a new agreement/file that reflects their approval on the new value of compensation re-calculation.
- The value of compensation of the potential affected land will be defined and forwarded to the financial department in the EDCL.
- The financial department will release the compensation amount from the budget item allocated for compensation and requested early by the project manager.
- The Compensation Committee will disburse the compensation value according to the previous conditions of payment.
- All updated lists, agreement and money disbursement will be documented by EDCL.

7.5.3. Income and Livelihood Rehabilitation Measures

For this project, PAPs are only eligible for compensation for land as identified in chapter 7. The project will not result in the type of livelihoods damage that will require livelihoods rehabilitation measures. No other impacts are anticipated that requires additional assistance or compensation because the national expropriation law in public interest has a provision of addition of 5% as disturbance allowances to the affected people.

7.6. Compensation for Crops and Trees

The PAPs will be encouraged to harvest their produce before electrification project activity. In order to ensure that this is possible, and that appropriate market prices are received for yields, there needs to be sufficient consultation beforehand so that harvesting can be properly planned. If crops, and trees cannot be harvested, compensation for loss of crops and trees including value of fruit trees will be provided as follows:

- Provision of cash compensation for value of crops and trees lost, as per the Rwandan expropriation law in public interest.
- Provision of time for harvesting the mature crops and 5% of disturbance allowance to the affected people.

In addition to compensation for tree and shrub losses, the PAP shall be mobilized to plant the forest in collaboration with their respective administration District given that the area where the project will be implemented is among the districts that have potential forest on their territory.

7.7. Acquisition of the Right of Way (RoW)

The construction of medium voltage lines requires a Right of Way (RoW) for both construction and operational phases. During the construction, the right of way is cleared for visibility and construction activities while during operational Phase the RoW used under restriction conditions. Due to the impacts associated with the acquisition of rights-of-way for projects will follow laid down procedures and be in conformance with both the AfDB ISS OS2 of Land acquisition, restriction on land use and involuntary resettlement principles and the Rwanda Utilities Regulatory Agency (RURA) guidelines N° 01/GL/EL-EWS/RURA/2015 on the right-of way for Power Lines in Rwanda. In accordance with the guidelines N° 01/GL/EL-EWS/RURA/2015 on the right-of way for Power Lines in Rwanda the easement process will follow the following key steps:

- Rwanda Energy Group shall acquire easements by negotiating with landowners on whose land the power line will be placed. As agreed, upon in negotiations, the Licensee may pay a compensation fee to the landowner in one lump sum.
- The easement agreement shall specify rights and restrictions of both the Licensee's and the landowner's use of the land. The Licensee shall be allowed to build and maintain the power line while the landowner shall retain general ownership and control of the land.
- The Local Authorities in charge of land management and the landowner shall ensure that this easement is disclosed for all subsequent transaction including proposals for development and sales/exchange or transfer of ownership of the land.
- If the Licensee removes a power line, it might offer the landowners the opportunity to cancel their easement agreements.
- The Implementing agency shall not use any land beyond the boundaries of the easement for any purpose, without the consent of the landowner.

- The certified valuer has shown the summary of the price reference as per below certificate:

CULTURES /IMYAKA

Minimum rate is for crops comparable to nursery level and maximum rate is for pick production stage. Other factors may be the type of seeds, the nature of soil and normal production from it in the area; guidance by an agronomist may be useful if necessary.

Commonly known as	Unit	Minimum rate (FRW)	Maximum rate (FRW)
Ibishyimbo/beans	sqm	80	150
Amashaza/Petit poids	sqm	80	150
Ubunyobwa/Arachides	sqm	100	220
Ingano/Orge	sqm	60	100
Amasaka/Sorgho	sqm	60	100
Mais/Ibigoli	sqm	80	150
Uburo/Eleusine	sqm	300	500
Ibirayi/Pomme de terre	sqm	250	400
Amateke/Colocases	sqm	150	250
Ibikoro/Ignames	sqm	50	100
Ibijumba/Patates douces	sqm	150	250
Imyumbati/Maniocs	sqm	250	400
Isombe/Maniocs-legumes	sqm	800	1.500
Soya/Soja	sqm	100	250
Amashu/ Choux	sqm	500	900
Ibitunguru/Oignons	sqm	250	400

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CHAPTER VIII: INSTITUTIONAL ARRANGEMENTS

An appropriate institutional framework for all concerned parties including the project developer is important for successful expropriation for this project. It is important to ensure timely establishment and effective functioning of appropriate organizations mandated to plan and implement expropriation and compensation process.

The overall coordination of the implementation of the ARAP is provided by EDCL which oversees all resettlement planning and coordinates all issues relating to the compensation. EDCL will do this in close collaboration with local authorities falling within the project area. The roles and responsibilities of various actors are summarized in table below.

Table 11: ARAP Institutional Arrangements

Stakeholder Group	Sub-sector / Agency	Roles and Responsibilities
Government of Rwanda (GoR)	MININFRA-Project Coordination Unit	<p>To ensure a harmonized way of ISS implementation, there will be an Environmental and Social Management Unit with the following duties:</p> <ul style="list-style-type: none"> - To coordinate ISS implementation across all implementing agencies - To ensure compliance to ISS requirements by all project actors. - To build the capacity of ISS teams at national and District level. - To consolidate ISS implementation reports from all implementing agencies. - Lead negotiation with AfDB
Government of Rwanda (GoR)	MINALOC-Districts	<ul style="list-style-type: none"> - Assist in consultations with PAPs and stakeholders.

Stakeholder Group	Sub-sector / Agency	Roles and Responsibilities
		<ul style="list-style-type: none"> - Review and sign off all documentation (e.g. compensation agreement, compensation report etc.) - Transfer compensation payments to PAPs. - Monitor proper implementation of ARAP
Government of Rwanda (GoR)	MININFRA-REG/EDCL	<ul style="list-style-type: none"> - Oversee implementation of the ARAP - Prepare and update resettlement related documentation to ensure consistency and compliance with ARAP. - Provide all compensation packages as per ARAP. - Provide livelihood and vulnerable assistance measures. - Overall monitoring and evaluation of resettlement implementation (i.e. annual audits and review of sub-project level monitoring by affected districts)
Government of Rwanda (GoR)	Ministry of Environment /NLA	<ul style="list-style-type: none"> - Work closely with REG/EDCL/EUCL to facilitate resettlement process and ensure it meets national legislation regarding land ownership and use. - Oversee resettlement and compensation process for land resources. - Review land title documentation and ensure meets all land legislative requirements
Government of Rwanda (GoR)	Ministry of Finance (MINECOFIN)	MINECOFIN will be responsible for timely disbursing of the compensation funds to the respective commercial banks. In the case that PAPs own commercial bank accounts, the money will be transferred directly to individual bank accounts but if PAPs have accounts with SACCOs then the commercial banks will transfer to the SACCO accounts.

Stakeholder Group	Sub-sector / Agency	Roles and Responsibilities
Civil Society/ NGOs		<p>It will be involved in the implementation process of the Abbreviated Resettlement Action Plan. Activities they can be involved in and may include.</p> <p>Witnessing the ARAP process, overseeing of livelihood restoration programs,</p> <ul style="list-style-type: none"> - Monitoring and evaluation of the ARAP activities among others - Contribute to the implementation of energy projects; participate in the Sector-Wide Approach and in coordination mechanisms at the district and national level
PAPs		<ul style="list-style-type: none"> - The primary role of the PAPs during the process of measuring land and assessing property thereon is to be physically present and ascertain that indeed the measurements are correct to their satisfaction. Upon being adequately satisfied with the measurements, their signatures will be given as proof of approval. - Engage in project consultation forums. - Participation in measurement and sign-off of assets - Participation in monitoring & evaluation
Contractor and consultant team		<ul style="list-style-type: none"> - Equitably distribute jobs to both women and men and prioritize vulnerable households and impacted households. - Disseminate Information about dangers of HIV/AIDS, SEA, Child Exploitation and abuse, violence against women, sexual harassment. - Provide guidance for workers and communities regarding anti-social behavior.

Stakeholder Group	Sub-sector / Agency	Roles and Responsibilities
		<ul style="list-style-type: none"> - Restore all temporary construction works upon completion of project
District resettlement Committees together with District One Stop center		<ul style="list-style-type: none"> - Interface with District Land Bureau as mandated by revised Land Law. - Public Awareness, including extensive consultation with the affected people. - Approving land expropriation. - Provision of information on current land use, land tenure. - Ensuring grievance mechanisms meet legislative requirements;
Local Resettlement Committees (Grievance Redress committees) at cell level		<ul style="list-style-type: none"> - Public Awareness and mobilization meeting in general. - Development and implementation of ARAP, including assistance during resettlement, effective consultation with PAPs. - Facilitate coordination of information collation activities (such as surveys, sign-off) for monitoring purposes, in accordance with procedures put in place by the district authorities. - Elect representative of the Committee - To participate in complains resolution. - Complete the Grievance log.
Project Funding Agency	AfDB	Monitoring and Evaluation including implementation support mission
Resettlement Implementation Team (RIT)	EDCL PIU	<ul style="list-style-type: none"> - Facilitate the valuer to access the PAPs and local government officials.

Stakeholder Group	Sub-sector / Agency	Roles and Responsibilities
		<ul style="list-style-type: none"> - Work closely with the contractor to implement the site-specific instruments. - To work with the PAPs and LGOs in grievance resolution. - To work with the expropriation unit to speed up the PAPs payment. - To work with the Bank to make sure that the PAPs accounts are active.

Table 12: Local Community Resettlement Committee or Grievance Redress Committee

No	Member of	Roles and responsibilities
1	President (PAPs representative)	<ul style="list-style-type: none"> - Chairing meetings. - Give direction on how received grievances will be processed; - Assign organizational responsibility for proposing a response; - Referring cases to next level; - Speaks on behalf of GRC and s/he is the one to report to the cell or the sector administration level;
2	Vice president	<ul style="list-style-type: none"> - Chairing meetings on behalf of president in his/her absence. - Give direction on how received grievances will be processed; - Assign organizational responsibility for proposing a response; - Referring cases to next level; - Speaks on behalf of GRC and s/he is the one to report to the cell or the sector administration level; - Act as secretary of the committee

No	Member of	Roles and responsibilities
3	Village leader	<ul style="list-style-type: none"> - Represents local government at village level; - Resolves and lead community level grievance redress - Sends out notices for meetings; - Records all grievance received and report them to next local level
4	Cell executive secretary	<ul style="list-style-type: none"> - Proposes responses to grievances and lead in resolving community grievance unsolved from village level; - Records and reports all grievances received from village leaders; - Chairs sensitization meeting at the cell level during public consultations meetings. - Assists and guides in identifying vulnerable and disadvantaged groups within the cell.
5	Women and youth representatives	<ul style="list-style-type: none"> - Represent the interests of women and youth; - Advocate for equity and equal opportunities. - Help in prevention of sexual harassment and promote wellbeing of the women and youth. - Take part in resolution of any grievance related to sexual harassment and any gender domestic violence that may arise; - Mobilize women and youth to be active in income generating activities specifically for opportunities in the project's intervention areas.

No	Member of	Roles and responsibilities
6	Contractor representative	<ul style="list-style-type: none"> - Receive and log complaints/grievances, note date and time, - contact details, nature of complaint and inform complainant of when to expect response. - Handle complaints revolved around nuisance resulted from construction and endeavor to handle them satisfactory. - Inform engineer (supervisor) and GRC of received complaints/grievances and outcomes and forward unresolved complaints/grievance to GRC. - Attend community meetings, respond, and react to PAPs complaints raised concerning the contractor.
7	Supervising firm representative	<ul style="list-style-type: none"> - Represent client (EDCL); - Ensure that all grievances raised have been responded to, and that the contractor responds to the complaints raised concerning them, - Attend community meetings and respond to all concerns related to RUEAP from community. - Report on monthly basis the progress of GRM process.

8.1. Indicative schedule

The compensation process is governed by a clear and detailed legal framework that enables compensation committee to perform their work appropriately. In addition, the legal framework follows the AfDB-ISS.

Impact on land and Compensation for on land assets will be completed in coordination with relevant organizations and as per the principles of the developed RPF for this specific project. The specific process is as follows:

- Prior to the ARAP preparation, the project design department in EDCL provided a detailed map online routes scope to identify the expropriation scope and area.
- IRPV provided the prices for the different types of crops and trees.

- Compensation committee initially calculated the needed areas in cooperation with the Ruhango and Nyanza districts,
- Approval from the AfDB of the ARAP
- Prior to the implementation of the ARAP, verifying the situation on the ground and checking if any changes (compared to the census survey baseline) happen, document the change, assess the implication, and inform the AfDB.
- Delivery of compensation amount to the PAPs.
- Complete legal procedures for RoW acquisition and transfer.

8.2. Applied Cut-off Date

The effective date for the start of the Design, Supply, and Installation of Low Voltage And Medium Voltage Lines and Service Connections with the total length of 121 km for medium voltage line and 422 km for Low voltage line was March 2023.

The cut-off date is 02/05/2023 and Construction and rehabilitation activities will start after the compensation activities.

EDCL is to consider the timing of harvesting for seasonal crops and attempt to initiate construction works after this period as a mitigation measure. The Compensation Committee is to coordinate with:

- Ruhango and Nyanza Districts to provide information to the compensation committee about the compensation duration and process.
- Owners/PAPs and disclose information to them in order to put this measure into effect and ensure community participation.

Table 13: Tentative Implementation Schedule

Activities	2024							2025							
	May	June	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	Jul
During preparation phase															
Safeguards Assessment	X														
Consulting with the Ruhango and Nyanza districts /LG	X	X													
IRPV updated the price lists of crops															
Formation of the GRM Committee	X														
Consultation with the PAPs and other stakeholders	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Preparation of the project shapefile	X														
ARAP Preparation										X					
AfDB approval											X				
During the resettlement implementation															
Consultation with the PAPs	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Disbursing payment to the PAPs			X	X	X	X	X	X							
Documentation of the compensation activities							X	X							
Documentation of the Grievances recipients and responses			X	X	X	X	X	X	X	X	X	X			

Activities	2024							2025							
	May	June	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	Jul
Documentation of operation and efficiency assessment of the ARAP											X	X	X		
During Monitoring and evaluation															
Evaluation activities mid-term														X	
evaluation final impact														X	
Supervision of RAP implementation												X	X	X	X
Resettlement Implementation Completion Report															X

CHAPTER IX: BUDGET AND FUNDING ARRANGEMENTS

This section includes a budget breakdown estimating all compensation-related costs, including an allocation for contingencies. It also establishes financial responsibility for meeting resettlement commitments and describes funding flow arrangements.

The compensations are calculated according to:

9.1. Compensation for damaged properties

The sub-project will affect a total number of 3,279 PAPs including 1,120 PAPs in Ruhango District and 2,159 PAPs in Nyanza District with compensation amount corresponding to **682,498,882.00Rwf** including the 5% disturbance allowances and 10% of the contingent. In addition to this amount, there is also **50,050,000Rwf** for RAP Implementation and follow up as detailed in table 21 of this ARAP.

The total estimated budget is **732,548,882.00Rwf** either **557,495.34USD**. However, this estimated number of PAPs and value of compensation may slightly change due to different circumstances such as deviations, access road, etc.

Table 14: Summary of Estimated Compensation per Sector – to both Nyanza and Ruhango Districts

S/N	Sectors	No of PAPs	Value (Rwf)	5% (Rwf)
NYANZA DISTRICT				
1	Busasamana	122	24,328,973	1,216,449
2	Busoro	87	14,141,747	707,087
3	Cyabakamyi	81	14,628,758	731,438
4	Kigoma	252	46,898,140	2,344,907
5	Kibilizi	298	57,320,907	2,866,045
6	Mukingo	177	33,386,767	1,669,338
7	Muyira	301	57,399,714	2,869,986
8	Nyagisozi	207	54,954,236	2,747,712
9	Ntyazo	574	117,764,136	5,888,207
10	Rwabicuma	60	10,155,810	507,791

RUHANGO DISTRICT				
1	Kabagali	243	33,945,463	1,697,273
2	Kinazi	165	21,679,505	1,083,975
3	Mbuye	38	39,447,107	1,972,355
4	Mwendo	134	4,019,872	200,994
5	Kinihira	120	34,949,923	1,747,496
6	Ntongwe	54	9,394,245	469,712
7	Bweramana	123	17,911,971	895,599
8	Byimana	69	8,471,589	423,579
9	Ruhango	174	19,654,666	982,733
TOTAL		3,279	620,453,529	31,022,676

9.2. Fund Flow and payment procedures.

The EDCL goes through the following process before processing payments.

- The project manager and Safeguards prepare an estimated budget for the whole project activities, including compensations, this budget is passed on to the Financial Department at RUEAP/EDCL-REG to make the payment. (After the finalization of bidding procedures).
- The PIU of the EDCL-REG approves the budget prior to the construction activities (at least five months).
- The Finance department requests a certain amount of money based on preliminary estimates provided by project engineers (at least four months before the civil works).
- The compensation value will be transferred to the EDCL finance department (at least three months before the construction).
- The certified independent valuer begins the census survey and calculate the needed compensations accordingly. They send the survey lists, supported by the ID copy, land title, Account Number copy of the owner to the district which is responsible for approving the inventory.

- Thereafter they request the Finance Department to prepare the payment and send it to MINECOFIN for payment (at least one month before the construction).
- The entire amount of compensation should be paid to the owners prior to the construction.
- To ensure that women and men have equal access to compensation, married couples under community of property matrimonial regime provide a joint account for the disbursement of compensation.

CHAPTER X: CONSULTATION ACTIVITIES AND INFORMATION DISCLOSURE

10. 1. Introduction

This chapter aims to highlight the key consultation and community engagement activities and their outcomes that were conducted in relation to the right of way acquisition and mitigation of resettlement impacts, in addition to outlining the key aspects that were addressed when holding the consultation activities.

Consultation activities (census survey, scoping, interviews, and focus group discussions) with various stakeholders and community in the villages located in the project area including valuer from IRPV. The consultation activities including the affected persons were held for the proposed project area in compliance with relevant AfDB and Rwandan legislations.

10.2. Guiding Principals

Stakeholder consultation is usually informed by a set of principles defining core values supporting interactions with stakeholders. Common principles based on International Best Practice include the following:

- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized.
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner.
- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process.
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust.
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and

10.3. Public Consultation Activities

Consultation has been carried out in the form of a continuous process that started before the start of preparation of ARAP and ESIA and has continued during preparation of the ARAP study. EDCL has applied multi-levels of consultation with the stakeholder and the PAPs during preparation of the ARAP.

The consultation process is expected to be continued by EDCL during various stages.

The various consultation activities took place in the presence of:

- The Project Coordinator Eng. Casmir NYIRINKINDI (RUEAP-EDCL)
- The Senior Environmental and Social Safeguards Specialist: BORAMUNGU Apophia (EDCL-RUEAP) for any matter related to the safeguards.
- The Project Manager Jean Paul MUGABE (RUEAP-EDCL)

Following are the main objectives of the consultation activities held:

- Collecting information related to the socio-economic profile of the PAPs.
- Sharing information about the compensation approach including compensation values and the calculation methods with the PAPs
- Consulting the PAPs about the draft findings of the ESIA and ARAP studies
- Meaningful consultation and disclosure which will be based on the disclosure of information relevant project activities and will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders.
- Grievance mechanism by which the public and other stakeholders can raise concerns, which the Company will handle in a prompt and consistent manner.

10.3.1. Focus group discussions.

The focus group discussions were conducted in collaboration with the stakeholders especially local government officials where different sessions were organized, the aim of this focus group was as follows:

- Present project information to a group of stakeholders
- Allow stakeholders to provide their views on targeted baseline information.

- Allow small groups of people such as women, youth, vulnerable people, disabled people, etc. to provide their views and opinions.
- Build relationship with neighboring communities.
- Build relationships with communities.

10.3.1. Individual consultations

The individual consultation was organized and conducted to different categories of the individual stakeholders or representative such as FBOs, CSOs and others with aimed at:

- Seeking views and opinions from stakeholders
- Enable stakeholder to speak freely about sensitive issues.
- Build personal relationships.
- Record issues and opinions.

The following table shows the detailed consultation activities held during preparation of the ARAP:

Table 15: Summary of the Conducted Public Consultation Activities

Consultation approaches	Data collection tools	Time and location	Number of people consulted (male and female)	Main topics covered
Meeting with the concerned people in the public consultation process	Presentation of the project activities (PP Presentation)	11/09/2023 At Cell Office in Inteko z'Abaturage	M: 29 F: 26 Total: 55	Scope of the project and process of public consultation
Interviews with Stakeholders	Interview sheets. - FGD guideline	14/09/2023 At Ruhango and Nyanza districts offices	M: 31 F: 27 Total: 58	Discussing the roles of stakeholders in the ARAP process

Consultation approaches	Data collection tools	Time and location	Number of people consulted (male and female)	Main topics covered
				- Including interviews with PAH, the IRPV, and compensation committee to discuss the compensation approach and valuation methodology
Census Survey during the ARAP preparation	Census survey sheet	17/09/2023 At Cell level	57 Head of PAHs	Census of the affected persons and the scope of land acquisition conducted by RUEAP-EDCL-REG.
Interviews and consultation with GRC members	- Questionnaire - FGD guideline	18/05/2023 At Busoro Cell	38 GRC members	- Identification of impacts of land acquisition. -Collecting information related to the Socio-economic profile of the affected persons.

Consultation approaches	Data collection tools	Time and location	Number of people consulted (male and female)	Main topics covered
				- Discuss the impacts of land acquisition and compensation methodology.

10.4. Consultation Activities during Site Investigations

Prior to the planning phase, EDCL-REG teams conducted several visits to the project site in order to consult with the local community. The main objective of these visits was to introduce the project to the local governmental entities and meeting the community. During these visits, all the concerns and comments received from the Local Government Officials and the IRPV are considered during the planning of the project. Those visits also helped in determining the route of the lines.

10.5. Consultation Activities during Preparation of the ESIA and ARAP studies

The study team conducted seven (7) public consultations activities during different stages of preparing the studies for the project, the main objective was to give information about the project to the surrounding communities. In addition to, gaining information about their concerns and worries regarding the project during various implementation phases, through the following methods: Focus Group Discussions (FGDs), and interviews with local government and community stakeholders, focusing on PAPs, whose properties located in the construction of MV lines routes. The consultation activities were carried out in two phases, one of which was for the construction of MV lines, and the second phase was carried out during the preparation of the ARAP study. The consultation activities were attended by representatives from Consultant, REG- and the contractor.

Phase I: Consultation activities during Preparation of the ESIA

During the preparation of the ESIA and the ARAP, the study team conducted 7 public consultations activities with Governmental stakeholders in the Ruhango and Nyanza districts officials along the LV and MV line routes, and community people (25/05/ - 25/07/2023). Comments raised by participants were considered. Properties valuation and compensations concerns were raised as an important theme including questions about the compensation value.

Table 16: Summary of Consultation Activities in project area

Stakeholders		NUMBER		
		Male	Female	Total
Governmental Organizations and Authorities	Ruhango and Nyanza districts Officials	9	4	13
The residents in the project area	PAPs	56	37	93
Local Governmental Administration and NGOs	Environmental and Social administrations	4	7	11
	Local NGOs	2	0	2
Regulatory body	REMA	1	0	1
	RDB	1	0	1
Contractor for AfDB	Contractor	3	1	4
Supervising Firm	Consultant	3	1	4
Project owners	EDCL/RUEAP	5	3	8

Source: Safeguards own construct, 2024

The project team ensured to disseminate the following information to the participants during the meetings:

- The project objectives and justification
- Potential impacts
- Compensation strategy and mitigation measures
- Entitlement categories

- Grievances mechanism.

10.6. Comments and Concerns Raised during the ARAP Preparation.

Table 17: Key comments and concerns that raised during the Public Consultation activities.

Topic discussed	Concern/question	Response
The importance of the project	The construction and of MV lines, will be implemented in the Ruhango and Nyanza districts and the citizens shall benefit from the access to energy and reduce the load in the nearby centers and building?	The project will result in several positive impacts such as: Increase industrial development in the Ruhango and Nyanza districts. Provide job opportunities, especially for youth.
Operational Safeguard	The importance of adhering to the operation safeguard of AfDB for construction and operation	Officials from REG-EDCL confirmed that the international standards are applied by the implementing agencies, and the project is implemented with modern technologies to achieve the desired benefits from the project
RoW Acquisition	What is the Right of Way?	According to guidelines n°01/GL/EL-EWS/RURA/2015 Right of Way: strip of land set aside for a safety corridor distance between the power line and nearby structures and vegetation and which is used by the Licensee to construct, maintain or repair a power line. Right of way is the legal right, established by grant from a landowner or long usage (i.e., by prescription), to pass along a specific route through property belonging to another. A similar right of access also exists

Topic discussed	Concern/question	Response
		<p>on land held by a government, lands that are typically called public land, state land, or Crown land. When one person owns a piece of land that is bordered on all sides by lands owned by others, an easement may exist or might be created so as to initiate a right of way through the bordering land.</p>
	<p>Are we allowed to plant any types of trees later in the RoW?</p>	<p>yes, if their height does not exceed 3 m.</p>
<p>Impact of the project on agriculture land</p>	<p>Will there be permanent impacts on land productivity?</p>	<p>No, Ruhango and Nyanza EPCs, the project activities shall be implemented on the agriculture land, but the owner shall continue to use it with some restrictions.</p>
	<p>Who will be responsible for returning the land to its original state where the contractor shall be used as store?</p>	<p>The implemented company or construction contractor is responsible for returning the land to its original condition after the completion of the construction works</p>
	<p>Are the excavation sites of construction of MV lines at an appropriate distance from the other public utilities? What procedures are used to coordinate with all stakeholders to maintain existing facilities in the project area?</p>	<p>REG-EDCL is compliant with all the regulations and instructions it has been provided by official authorities. Therefore, it should be emphasized that the MV lines, are not arbitrarily chosen. Rather, EDCL has previously coordinated with the officials at the Ruhango and Nyanza districts to ensure that the other public utilities are kept safe.</p>
<p>Compensation</p>	<p>Who is responsible for estimating compensatory</p>	<p>Contractor and EDCL -REG will closely work with IRPV and certified independent</p>

Topic discussed	Concern/question	Response
	<p>values? In addition, how this will be done?</p>	<p>valuers from this institute will request the Institute to update a price list. That list is updated annually and is disclosed in official gazette before relying on it to estimate compensation.</p> <p>EDCL-REG will consult with you prior to the implementation of the prices in order to make sure that the prices are fair and based on the real market price.</p>
	<p>Compensation must be made by mutual agreement with the crops and forests owners, not against their will and the latter must be notified before civil works begin to harvest their mature crops and trees</p>	<p>EDCL -REG does not start construction work until compensation is paid, agreed upon with the property owners.</p> <p>Consultation sessions will be held with the property owner in each area, before the start of the construction work sufficient period, and agreements will be concluded with them including compensatory value, as is the case in all REG-EDCL projects. Property owners are notified before construction work began a period sufficient; so that they can harvest the crop, REG-EDCL also pays the value of the crops and trees as a compensatory value.</p>
<p>GRM</p>	<p>What if I observe that the proposed/calculated compensation is unfair?</p>	<p>The compensation will be paid in fair value based on full replacement cost; we don't want to do harm to the community.</p> <p>However, in case you are not satisfied with the estimated compensation, you can file a complaint to the expropriation unit or GRC Members responsible in the RoW.</p>

Topic discussed	Concern/question	Response
		<p>You can also submit a complaint through various channels (by mail, phone, or verbally to the Site Project Manager).</p> <p>The Social safeguards Specialists will be responsible for handling the grievances along with the Site Project Manager or coordinator as well as conducting awareness raising activities among PAPs to inform them about the grievance mechanism.</p>

Source: Safeguards own construct, 2024

10.7. Other Public Consultation Activities

- Prior to construction or rehabilitation, EDCL-REG team has sent letters to Ruhango and Nyanza districts to inform them about the procedures of the compensation and the establishment of the compensation procedure.
- After sending the letters, different meetings were conducted with the Ruhango and Nyanza districts staff.
- Specific and differentiated efforts will be made to reach out to women in particular during the upcoming consultations on the Implementation of the ARAP (which will be documented by the safeguards).
- EDCL’s general practice is usually to conduct several meetings with the PAPs at the project affected areas in order to inform the PAPs of the compensation procedures and other project activities at large and avoid any problems.

10.8. Public Disclosure of the ARAP

10.8.1. Information Disclosure during Preparation Phase

The project, in compliance with the AfDB and Rwandan requirements; paid more attention to the disclosure of all information related to the project activities and potential impacts:

During the ARAP preparation all information related to the project including compensation and resettlement, will be publicly disclosed on the website of the following entities subject to the approval from the AfDB:

- REG website (<http://www.reg.rw>)
- Ruhango and Nyanza districts websites (www.ruhango.gov.rw & www.nyanza.gov.rw)
- The summary and the Final ARAP reports will be uploaded to these websites.
- A copy of the native language (Kinyarwanda) shall be made available to all affected parties throughout local government offices.
- The GoR will authorize the AfDB to publicly disclose this ARAP on their respective website.

During the ARAP data collection process, the Safeguards from REG-EDCL and Ruhango and Nyanza districts Officials as well as the consultant from IRPV disclosed all needed information to the PAPs. Information provided covered the following topics:

- Potential impacts on the properties within the RoW
- The valuation strategies
- Grievance channels
- Timeline for RoW Acquisition
- Tentative Project implementation time schedule

10.6.2. Final ARAP Disclosure

The executive summary should be translated into Kinyarwanda after approval from AfDB, EDCL-REG should disclose the Kinyarwanda and the English ARAP on REG and Ruhango and Nyanza districts websites as well as other locally appropriate locations (e.g.at local NGOs, FBOs, Cell Offices, etc.).

10.6.3. Information Disclosure during Implementation Phase

- Property owners will be informed about the implementation schedule. They will be notified by the IRPV Consultant and EDCL Safeguards Team. The notification memo should be provided to them in a written form (in addition to a verbal form).
- Disclosure of information in the religious places (churches/ mosques) might be useful to the project. Based on different studies implemented in the urban areas, advertising through religious places is one of the most practical strategies to disclose information.
- Disclosure of information in the local governmental offices (the Kinyarwanda summary of the ARAP should be available at those potentially affected).
- In addition to the above-mentioned strategies, all information about the PAPs and how they will be affected is already included during the individual meetings conducted during the census.

CHAPTER XI: GRIEVANCE REDRESS MECHANISM

11.1. Introduction

The Article 33 and 34 of the Expropriation Law No 32/2015 of 11/06/2015 provides complaints procedures for individuals dissatisfied with the value of their compensation. The Article 33 of the expropriation Law stipulates that dissatisfied persons have a period of 10 days from the application for counter valuation by the person to be expropriated. This application should be done within 7 days after the approval of the valuation report by the expropriator.

11.2. Common likely types of grievances and disputes in resettlement process

In practice, grievances and disputes that are most likely during the implementation of a resettlement program are the following:

- Misidentification of assets or mistakes in valuing them
- Disputes over plot limits, either between the affected person and the Project, or between two neighbors.
- Dispute over the ownership of a given asset (two individuals claim to be the owner of this asset); e.g. due to recent change of asset ownership.
- Disagreement over the valuation of asset; and
- Successions, divorces, and other family issues, resulting in disputes between heirs and other family members, over ownership or ownership shares for a given asset.

The experience has shown that many grievances derive from misunderstandings of the Project Policy, or result from neighbor conflicts, which can usually be solved through adequate mediation using customary rules. Most grievances can be settled with additional explanation efforts and some mediation using customary disputes settlement mechanisms:

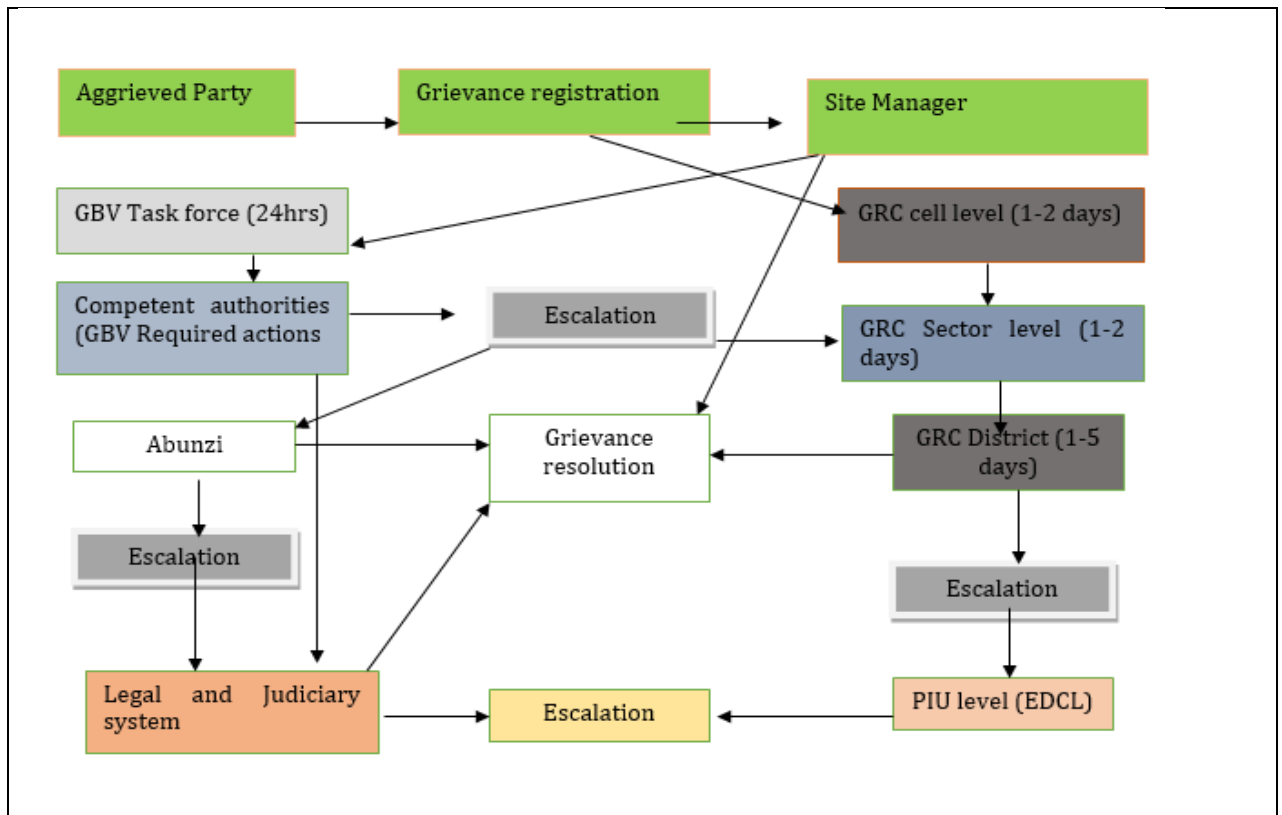
- Through explanations (for instance explain in detail how the Project calculated the complainant's compensation and that the same rules apply to all); or
- Through arbitration, resorting to elders or individuals well regarded by the community and external to it.

In contrast, resorting to the judicial system often results in long delays before a case is processed, may result in significant expenses to the complainant, and requires a complex mechanism,

involving experts and lawyers, which can fall well beyond the complainant's control, and be counterproductive to him/her. Also, courts may declare themselves not competent for matters related to informally owned property. Therefore, the Project will put in place an extra-judicial mechanism for managing grievances and disputes arising from the resettlement process based on explanation and mediation by third parties. Each of the affected persons will be able to trigger this mechanism, while still being able to resort to the judicial system. Procedures relevant to this amicable mechanism are detailed below. It will include three different levels:

- Registration of the complaint, grievance or dispute case by EDCL in collaboration with local authorities;
- Processing of the grievance or dispute until closure is established (within 15 days) based on evidence that acceptable action was taken by EDCL; and
- In the event where the complainant is not satisfied with action taken by EDCL as a result of the complaint, an amicable mediation can be triggered involving a mediation committee independent from the Project.

Figure 4: Grievance Redress Chanel



Source: RUEAP-EDCL, 2024

11.3.1. Amicable Resolution Mechanism

Complaints that cannot be closed to the complainant’s satisfaction will be handed over to a mediation committee that will include the following individuals: One representative of the local administration; One EDCL representative acting as an observer; Three representatives of the affected people, including at least one woman, chosen from the CNF at Cell level and/or amongst community based organizations, elders, customary authorities, One representative of an NGO or of a religious organization present in the project area.

The main function of the committee would be arbitration and negotiation based on transparent and fair hearing of the cases of the parties in dispute between PAPs and the implementing agencies for local government. The committee gives solution to grievances related to compensation amounts, delays in payment of compensation or provision of different type of resettlement assistance.

Process

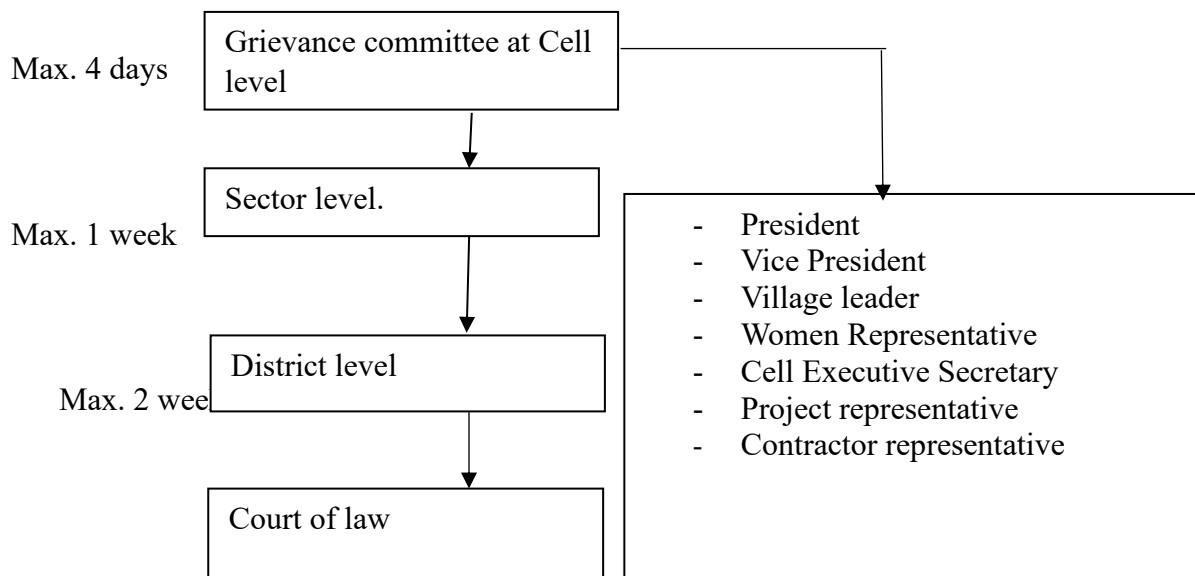
11.3.2. Processing

After a complaint or dispute has been registered, EDCL will prepare the technical background to the complaint (for instance, the proposed compensation amount, the list of meetings and interviews with the complainant, a description of the exact reason of the dispute, etc.) for consideration by the mediation committee. The complainant(s) will be invited before the mediation committee, which will mediate and attempt to propose a solution acceptable to both parties (EDCL and complainant). If need be, other meetings will be held and the committee may resort to one of its members to arbitrate in a less formal framework than meetings, if appropriate.

If reached, the agreement will be sanctioned by a settlement agreement signed by the parties, and the chair of the mediation committee will be responsible for monitoring the implementation of this agreement, which will include all references to the applicable local law provisions.

Grievance resolution is encouraged to be resolved at Cell level, as they are aware of and involved in the whole process. If the grievance is not resolved in this way, local courts (ABUNZI) should be used. If not resolved then the high court or court of appeal of Rwanda remains an avenue for voicing and resolving these complaints.

Figure 5: Grievance redress composition at Cell level and timeline to implement this ARAP.



Source: Safeguards own construct, 2024

11.3.3. Grievance Log

Grievance should be recorded in a log by EDCL Social Safeguards. He will record all information of peoples complained, nature of complaint, how it was resolved and timeframe for close-out. The suggested grievance handling procedure can be summarized as follows:

11.3.3.1. Grievance Redress Committee (GRC)

First, all interested stakeholders have developed a Grievance Redress Mechanism (GRM) for potential use. The aim of the grievance redress mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. This grievance redress mechanism ensures that complaints and grievances are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. As the GRM works within existing legal and cultural frameworks, it will be effectively implemented by a Grievance Redress Committee (GRC), which is organized in such a way that it will comprise of local community representative, PAPs representative, local authority representative at village and cell levels, EDCL/RUEAP and its safeguards.

As mandated by the law on gender equality, women representation will make up at least 30% of the GRC. All PAPs representatives will be directly elected by their peers and the number of members may vary depending on the context and particularities of each sub-project site characteristics.

11.4. Description of tasks and day-to-day responsibilities

- Receive unresolved complaints/grievance from RUEAP-EDCL and shall take over;
- The Grievance Redress Committee will log these in the Complaints Register and inform the Project Implementation Unit.
- The Grievance Redress Committee will keep grievance Logbook and ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The Log will contain record of the person responsible for an individual complaint, and records dates for the following events:

- Date the complaint was reported.
 - Date the Grievance Log was added onto the project database.
 - Date information on proposed corrective action sent to complainant (if appropriate);
 - The date the complaint was closed out; and
 - Date response was sent to complainant.
- On receipt of the complaint, the GRC at cell level will endeavor to resolve it immediately. In case the GRC at cell level fail to solve the complaint, it will be escalated to the GRC at Sector level. If unsuccessful, the GRC or the complainant then notifies District Officials.
 - At each level of the project, GRC will participate to solve complaints within a period of 24-48 hours or otherwise if escalated, it can be handed to the next level.

11.4.1. Response to aggrieved party

Response to grievance will be through the following channels.

- The same channel the complaint was submitted.
- Response to grievances should be handled in timely manner (according to the duration indicated for each tier), thereby conveying a genuine interest in and understanding of the worries put forward by the community.
- EDCL-REG should keep a record of complaints and results.

11.4.2. Monitoring of grievances

All grievance activities should be monitored in order to verify the process. The following indicators should guide the monitoring process:

- Number of received grievances per month (Channel, gender, age, basic economic status of the complainants should be included)
- Type of grievance received (according to the topic of the complaint)
- Number of grievances solved.
- Level of satisfaction with grievance resolutions
- Documentation efficiency
- Dissemination of activities done.
- Efficiency of response to grievance provided (efficiency in time and action taken)

A Grievance Monitoring Report should be developed on a Semi-annually (6 months) basis to keep track of all grievances developed. The report should be developed by the Safeguards from RUEAP-EDCL.

All grievances received shall be documented in a grievance register. The following table represents the main contents of such form:

Box 2: Grievance Form

Serial Number:Date:.....IDN ⁰ :.....Name:.....
Gender of the aggrieved person:
Age of the aggrieved person:
Education of the person reporting a grievance:
Topic of grievance:
Actions to be taken (short term- long term):
The referral of grievance:
Monitoring for grievance:

CHAPTER XII: GENDER MAINSTREAMING IN EXPROPRIATION PROCESS

12.1 Introduction

Gender mainstreaming in the preparation of the ARAP is very important aspect on social inclusion, this was done to comply with the African Development Bank Group Gender Strategy 2021 – 2025 by investing in Africa’s women to accelerate inclusive growth as socially constructed roles and responsibilities assigned to women and men, girls and boys have direct and indirect impacts on how they experience daily life, understanding the different needs of women and men, girls and boys and the different impacts that social, environmental, political, or economic interventions may have on each group is crucial to creating inclusive, safe, and sustainable society as well as empowering women and vulnerable groups⁴. To this end, both men and women have equal opportunity in job accessing and the compensation account is regarded by both men and women.

Gender is an important factor in determining differential impact, the focus of resettlement planning is at the household level; failure to understand intrahousehold dynamics is more likely to adversely affect women than men.

Consider the different needs of women and men and people of different socio-economic conditions and people with disabilities in the project design and systematically integrate gender into all project activities (planning, implementation, monitoring, reporting) to enable beneficiaries to participate and benefit equally. Therefore, men and women have equally participated to all project stage as the project is in implementation stage, both men and women contributed to all stage of the project activities to ensure their integration mainly women and vulnerable groups in the project intervention area.

Gender-informed resettlement is possible and it can minimize the pain as well as help smooth the project resettlement process through managing and implementing the resettlement process to integrate gender dimensions throughout the project cycle by undertaking initial gender impact screening and assessments, the development of corresponding mitigation measures, implementation, monitoring, and evaluation. This resettlement process will be gender sensitive as it leads to equal land rights for both women and men and gender issues will be adequately addressed through rights and equity concerns identification, confrontation, and tackling.

⁴ UN, sustainable development group gender equality and women empowerment, 2024

12.2 Gender in Identifying Target Participants

- Women, vulnerable groups such as persons with disabilities should always be encouraged to participate in resettlement activities.
- Ensure community “gatekeepers” such as community leaders, women’s civil society organizations, or others are first engaged in the process and mobilize their support to participate in the meetings and encourage women full participation.

12.3 Gender in Identifying Appropriate Methods

- Use differentiated facilitation methods like local language to collect the opinions of women and men, be aware of the different dynamics between the men and women in the group.
- During the ARAP preparation, data collection separate meetings or group discussion for women and men was the appropriate method and encourage greater each group to voice up their opinion as in community meeting instead of only men used to speak while women stayed quiet.
- Women opinions were considered during the preparation of the ARAP and equal participation in resettlement process was considered.
- Participation of women in discussions, give more attention to those who lack confidence by asking encouraging questions, remember that women tend to have more time constraints than men due to their household and family responsibilities. They might also be less mobile and flexible to join meetings or trainings. Therefore, plan meetings and training adequately to ensure that women can participate and ensure barriers for women and other socially excluded groups to attending community meetings and participating in decision-making are identified and mitigated (time and day the meeting is held, meeting location, transport required to attend, childcare limitations)

12.4 Gender in Identifying Appropriate Timing

Always consult participants or their representatives before setting dates and times for meetings. Schedule events based on convenient times for beneficiary women. For example: at a time when women do not have household responsibilities (e.g., when children are at school and domestic chores are completed) and consider traditional ceremonies in their communities.

Coordinate or combine with local events organized by local authorities or women's unions to take advantage of all participants being in one place and to reduce the time burden on all participants, especially women.

12.5 Gender in identifying appropriate Venues.

Consider convenience and safety elements of the venue to encourage the participation of women and people with disabilities. For example, select a venue that is central for participants, assess the accessibility for people with disabilities (e.g., are there disability toilets and wheelchair ramps), arrange the meeting room with enough space, light, air, and seats, and provide additional support in cases where events are far from participants homes.

The following are key points to ensure efforts are made to maximize the involvement of women throughout all stages of the resettlement process:

- Actively engaging women in the preparation of an inventory of losses and consultation meetings,
- Capacity-building training for female heads of households,
- Ensuring joint registration of land rights in the names of the husband and wife,
- Ensuring that women have equal access to compensation funds and, during distribution of compensation to men and women, priority payments is given to poor households headed by women,
- Ensuring that the needs and concerns of women are addressed in resettlement process.
- Ensure that the resettlement process go hand in hand with gender issues to help mitigate concerns and empower women.
- Integrate gender into the whole process and stakeholders' consultations. Therefore, regularly consult relevant stakeholders and target groups on their perceptions of gender and social safeguards to identify opportunities to enhance gender and manage negative perceptions.

Women are often more vulnerable to negative impacts of resettlement because they may not be recognized as having different needs, and may not be equally compensated, the project has developed a gender sensitive resettlement action plan to ensure that women beneficiaries will be

compensated appropriately and benefit equally from the process where it should be important to focus on the equal and effective participation and benefits of women and disadvantaged groups in all resettlement activities to better benefit from enhanced awareness, skills, and confidence to participate actively.

Table 18: Proposed Gender-Related Results and Indicators

Outcomes and outputs	Indicators	Sources of information
PUBLIC CONSULTATIONS		
Incorporation of contributions from women during consultations in project design	<ul style="list-style-type: none"> - % of contributions by men and women during consultations included in project design - Level of satisfaction of men and women consulted about the consultation process 	<ul style="list-style-type: none"> - Report of public consultation - Satisfaction comments after consultation
Women participate in consultation processes related to the project	<ul style="list-style-type: none"> - Number of men and women who participate in consultations 	Consultation attendance lists, disaggregated by sex
Consultations designed with a focus on gender equality	<ul style="list-style-type: none"> - Number and % of consultations with a focus on gender equality (appropriate scheduling, gender segregation, provision of childcare, etc.) - Gender equality elements included in the consultations (appropriate scheduling, gender segregation, provision of childcare, etc.) 	Consultation reports
COMPENSATION FOR DAMAGED PROPERTIES		
Women receive financial compensation	<ul style="list-style-type: none"> Number and % of women who receive financial compensation. Number and % of household headed by women receive financial compensation 	Household surveys

<p>Measures implemented to ensure that women receive financial compensation appropriately</p>	<ul style="list-style-type: none"> - Number and % of women and men who attend the signing of contract - Number of men and women who attend information meetings / consultations on financial compensation - Increase in the number and % of women who are aware of their rights to the household's properties 	<ul style="list-style-type: none"> - Project reports - Signed expropriation files - Information meeting/consultation attendance lists
<p>Negotiations concerning the resettlement plan that include women</p>	<ul style="list-style-type: none"> - Number and % of women who participate in negotiations on the resettlement plan among the overall participants 	<p>Negotiations meeting attendance list</p>

CHAPTER XIII: MONITORING, EVALUATION, REPORTING ARRANGEMENTS AND BUDGET

13.1. International Best Practice

Project development partner should monitor and report on the effectiveness of ARAP implementation. The objective should be to provide the EDCL with feedback and to identify problems and successes as early as possible to allow timely adjustment to implementation arrangements. Monitoring and evaluation activities should be integrated into the overall project management process, and the ARAP must provide a coherent monitoring plan that identifies the organizational responsibilities, methodology, and the schedule for monitoring and reporting.

13.2. Project Approach

The Project will conduct monitoring and evaluation to track the Resettlement Action Plan Implementation. The monitoring and evaluation will give particular attention to the project-affected communities, especially vulnerable groups, including female headed households and orphan-headed households. Monitoring and evaluation have the following general objectives:

Monitoring specific situations or difficulties arising from the implementation, and of the compliance of the implementation with objectives and methods set out in the Abbreviated Resettlement Action Plan.

Evaluating emergent, mid-term, and long-term impacts of the project on the welfare of impacted households, communities, and local government is crucial. To ensure that this was effectively done, sufficient involvement of project-affected persons in participatory monitoring and evaluation of short-term, mid-term, and long-term project activities and effects is essential.

Monitoring activities will comprise 2 main components:

- Internal monitoring.
- ARAP Implementation Completion Report.

13.3. ARAP Monitoring & Evaluation

The purpose of monitoring is to provide Project Management, and directly affected persons, households and communities, with timely, concise, indicative information on whether compensation, resettlement and other impact mitigation measures are on track to achieve

sustainable restoration and improvement in the welfare of the affected people, or that adjustments are needed.

Monitoring verifies that:

- Actions and commitments for compensation, resettlement, land access, and development in the ARAP are implemented fully and on time.
- Entitled persons receive their compensation on time Compensation and livelihood investments are achieving sustainable restoration and improvement in the welfare of Project-Affected Persons, households, and communities.
- Complaints and grievances are followed up with appropriate corrective action.
- Vulnerable persons are tracked and assisted as necessary.

In brief, monitoring answers the question: Are Project compensation, resettlement and other impact mitigation measures on time and having the intended effects?

Monitoring will consist of (a) internal monitoring by EDCL as an integral part of management, working with the impacted communities; and (b) external monitoring by EDCL appointed safeguards and the impacted communities.

Monitoring will be done by:

- Audit
- Conventional sample surveys
- Community participation.

13.4. Internal Monitoring

It is proposed that internal monitoring of ARAP implementation will be undertaken by EDCL. Regular progress reports will be prepared and submitted to management and relevant government authorities. The internal monitoring will look at inputs, processes, and outcomes compensation/resettlement/other impact mitigation measures.

Internal Monitoring will include stakeholder participation where possible, particularly directly-affected communities. This may include participation in household sign-off activities, monitoring of cash flow from the central Bank or MINECOFIN to the SACCOs where PAPs possess the accounts, monitoring in PAPs by collecting all related information or data to complete the PAPs individual files.

13.5. Indicators for Internal Monitoring and reporting requirements

Indicators selection for the purpose of monitoring and evaluation would be guided by the following principles:

- Preference for fewer indicators that have significant validity over more indicators of less significant value.
- Preference for indicators used by national institutions in order to be able to compare results with control groups in other parts of Rwanda and avoid reinventing the wheel.

Measuring outcome and impacts on the following levels:

- Monetary measuring of livelihoods through a quantitative income or expenditure survey
- Qualitative indicators measuring perception of Project-Affected Persons.
- The Project report shall have a part of the ARAP implementation which shall be regularly reported to the development partner (AfDB).

Table 19: Selection of Indicators for Internal Monitoring and reporting

MONITORING ASPECT	PARAMETERS TO BE MONITORED	MONITORING FREQUENCY
Performance against schedule	Progress in technical validation of affected assets and signature of compensation agreements between PAP and EDCL: % complete	Monthly
	Payment of compensation: % complete	
	Grievance process: received/responded/resolved no. of grievances	
	Consultation activities: discussions, interviews, etc. records of meetings.	
	Summary of monitoring activities, to be integrated into the ARAP Implementation Status Reports	
Level of PAP's satisfaction	Results of routine interviews with PAPs	Continuously
	Have PAPs experienced any hardship as result of the Project?	
	Results of routine interviews with PAPs	

MONITORING ASPECT	PARAMETERS TO BE MONITORED	MONITORING FREQUENCY
Consultation and Grievances	Do PAPs understand the process of land acquisition/compensation? Results of routine interviews with PAPs	
	Do PAPs understand avenues for expressing grievances? Results of routine interviews with PAPs	
	What types of grievances have been issued and how have these been resolved? How many outstanding? Summary of input from Grievance Procedure and routine interviews with PAPs: factual information.	

13.5. Properties Valuation Completion Audit

After the project is completed means households connected and payment of the PAPs completed, the EDCL shall organize the safeguards team which will be dedicated to audit the project and write up the Implementation Completion Report, this shall be done as part of the project activities prior to its closure.

The purpose of the Completion Audit is to verify that EDCL has complied with properties valuation Commitments defined by the ARAP, and more generally are in compliance with national and AfDB ISS-operational safeguard 2 – Involuntary resettlement: land acquisition, population displacement and compensation.

Reference documents for the Completion Audit are the following:

- This Abbreviated Resettlement Action Plan.
- Rwanda Legislations land acquisition and resettlement.
- AfDB regulations and guidance related to involuntary resettlement.

The main objectives of the completion audit are the following:

- General assessment of the implementation of the ARAP against the objectives and methods set forth in the ARAP.
- Assessment of compliance of implementation with laws, regulations and safeguard policies
- Assessment of the fairness, adequacy and promptness of the compensation and resettlement procedures as implemented.

- Evaluation of the impact of the compensation and resettlement program, measured through incomes and standards of living, with an emphasis on the “no worse-off if not better-off” requirement.
- Identification of potential corrective actions necessary to mitigate the negative impacts of the project, if any, and to enhance its positive impacts.

The ARAP Implementation Completion Audit (ARAPICA) will be based on documents and materials generated internally. In addition, auditors will make their own assessments, surveys and interviews in the field within stakeholders including the affected community.

13.6. Cost Estimation and Budget

The overall ARAP budget have the following key elements; ARAP compensation cost, under this section, there is compensation of the trees and crops, Disturbance Allowance (5%) and ARAP Contingency amount (5%), while the section of ARAP implementation and follow up cost has Stakeholder Engagement budget as continuous activity, Grievance management budget and ARAP Implementation Completion Audit, as this ARAP is affecting crops and trees only, there was no provision for livelihoods restauration as there is no land acquisition and relocation of the affected communities.

Table 20: Estimated ARAP Budget

S/N	Item	Overall Cost (Rwf)	Overall Cost (USD ⁵)
I. ARAP compensation cost		682,498,882.00	519,405.54
1	Compensation of the trees and crops	589,430,853.00	448,577.51
2	Disturbance Allowance (5%)	31,022,676.00	23,609.34
3	ARAP Contingency amount (10%)	62,045,353.00	47,218.69
II. ARAP implementation and follow up cost		50,050,000.00	38,089.80

⁵ Rate as of May 24, 2024

1	Stakeholder Engagement	16,300,000.00	12,404.87
2	Grievance management	9,250,000.00	7,039.57
4	ARAP Implementation Completion Audit	24,500,000.00	18,645.36
Grand total		732,548,882.00	557,495.34

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1. AfDB, 2013. Integrated Safeguards System.
2. AfDB, The African Development Bank Group Gender Strategy, 2021 – 2025
3. AfDB, 2020. RPF for RTSRLMC Project
4. GoR, 2023. Constitution of the Republic of Rwanda, Revised in 2023.
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6. GoR, 2013. Ordinary Law N° 43/2013 of 16/06/2013 Governing Land in Rwanda, Repealing Organic
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11. MININFRA, 2015. Rwanda Energy Policy.
12. MININFRA, 2018. Energy sector strategic plan
13. MINIRENA, 2010. Law No 17/2010 of 12/05/2010 establishing and organizing the real property valuation profession in Rwanda.
14. MINIRENA, 2013. Law N° 43/2013 of 16/06/2013 governing land in Rwanda.
15. REG, 2019. REG Strategic plan.
16. UN, 2024. Sustainable development group gender equality and women empowerment.

ANNEXES

Annex 1: Sample of attended Participants During Public consultation in Nyanza and Ruhango Districts

Personal information intentionally removed

Annex 2: Sample grievance redresses form.

Grievance Number		Copies to forward to:
Name of the recorder		(Original) Receiver Party
District/ Sector/Cell		
(Copy)- Responsible Party		
Date		
INFORMATION ABOUT GRIEVANCE		
Define the Grievance		
INFORMATION ABOUT THE COMPLAINANT		Forms of Receive
Name-Surname		Phone line
Address		Community/Information meetings
Village/ Cell		Mail
Sector/ District		Informal
Signature of Complainant		Other

Incidents		Resettlement	Employment	Construction	Worker	Other
Regarding		Process (specify)	And	Community Relations		(specify)
Expropriation and		Recruitment		-	Nuisance from dust	
Compensation		(Specify)		-	Nuisance from noise	
(Specify)				-	Vibrations due to explosions	
-Misconduct of the project personal/worker - Complaint follow up Other						

Grievances Close Out Form

Grievance Number:.....

Define immediate action required:.....

Define long term action required (if necessary)

Verification of corrective action and sign off.

CORRECTIVE ACTION TAKEN	DUE DATE

Responsible Party

Notes: This part will be filled in and signed by the complainant when he/she receives the compensation or file is closed out

Complainant.....

Name and signature.....

Date...../...../.....

Representative of Responsible Party.....

Title, Name and Signature.....

Date.....

Annex 3: Crops Price Reference

INSTITUTE OF REAL
PROPERTY VALUERS
IN RWANDA



ORDRE DES EVALUATEURS
DES BIENS IMMOBILIERS
AU RWANDA

CROPS REFERENCE PRICES (IBICIRO NGENDERWAHO BY'IBIHINGWA/IBITI)

IBITI BIBAZWA /BOIS D' OEUVRE

Minimum rate is meant for trees fresh from nursery and Maximum price is for trees ready for production. It is important to note that after optimum age of production, this type of trees may depreciate when they can no longer serve the core purpose because of age.

Commonly known as	Unit	Minimum rate (FRW)	Maximum rate (FRW)
Gereveliya	piece	1000	5,500
Umusave	pees	1000	10,000
Inturusu	pees	1000	6,500
Umuko	pees	1000	8000
Sipure	pees	1000	5300
Pinusi	pees	1000	5500
Sakaranda	pees	1000	6500
Acacia	pees	1000	6500
Lilas	pees	1000	5200
Araucaria	pees	1000	6500
Filawo	pees	1000	4500

**INSTITUTE OF REAL
PROPERTY VALUERS
IN RWANDA**



**ORDRE DES EVALUATEURS
DES BIENS IMMOBILIERS
AU RWANDA**

Inyanya/Tomates	sqm	500	800
Intoryi/Abergines	sqm	600	1,000
Karoti/Carottes	sqm	200	300
Saladi/Salades	sqm	150	250
Sereli/Celery	sqm	200	300
Inzuzi/Courges	sqm	3,000	4,000
Izindi mboga/Autres legumes	sqm	50	300
Ananasi/Ananas	sqm	1,350	2,000
Ipamba/Coton	sqm	720	1,500
Umuceli /Riz paddy	sqm	360	700
Itabi/Tabac	sqm	1,000	1,200
Ibisheke/Canne a sucre	sqm	400	1,000

IBITI BYERA IMBUTO ZIRIBWA N'IBITI BIVAMO IMITI/ PLANTES FRUITIERES ET MEDICINALES/ FRUIT AND MEDICINAL PLANTS

Minimum rate is meant for trees fresh from nursery and Maximum price is for trees ready for production. It is important to note that after optimum age of production, this type of trees may depreciate when they can no longer serve the core purpose because of age. Other factors may be the state of care and appearance and visible level of production for items in that age.

Commonly known as	Unit	Minimum rate (FRW)	Maximum rate (FRW)
Maracouja	pce	1,000	3,000
Ibinyomoro/Prunier du Japon	pce	1,000	3,000
Umutima w'imfizi /Coeur de boeuf	pces	2,000	10,000
Umwembe/Manguier	pces	2,000	10,000
Ipera/Goyavier	pces	2,000	10,000
Ipapayi/Papayer	pces	2,000	10,000
Les Agrumes	pces	3,000	12,000
Macadamia	pces	2,000	30,000
Igiti cy'avoka/Avocatier	pces	3,000	20,000
Vanilla	pces	2,000	10,000
Igiti cya Moringa	pces	3,000	12,000
Ibobere/Murier	pces	1,500	8,000
Ibindi biti byera imbuto ziribwa Bitavuzwe/Autres arbres fruitiers	pces	2,000	10,000
Ibiti bitanga imiti ya Kinyarwanda/Plantes medicinales	pces	5,000	20,000

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IBIHINGWA N'IBITI NKONDABUTAKA/ CULTURES PLURIANNUELES ET PERENNES/ MULTI-ANNUAL AND PERENNIAL CROPS

Minimum rate is meant for trees fresh from nursery and Maximum price is for trees ready for production. It is important to note that after optimum age of production, this type of trees may depreciate when they can no longer serve the core purpose because of age. Other factors may be the state of care and appearance and visible level of production for items in that age.

Commonly known as	Unit	Minimum rate (FRW)	Maximum rate (FRW)
Ikawa/Cafeier	pces	1,500	10,000
Ibireti/Pyrethre	pces	50	200
Icyayi/Theiers	pces	500	3,000
Ikinini/Quinquina	pces	300	1,000
Urutoki/Bananaeraie	pces	1,500	5,000
Urusenda/Pili pili	pces	200	500
Ikibingo/Pennisetum	sqm	350	2,000
Tiribusakumu/Tripsacum	sqm	350	1,000
Vetiveri/Vetivers	sqm	350	1,000
Setariya/Setaria	sqm	350	1,000
Kikuyu grass	sqm	3,000	8,000
Macyayicyayi/Citronnelle	sqm	350	500
Desmodium	sqm	5,000	12,000
Luzeme	sqm	7,000	15,000
Trefle	sqm	7,000	15,000
Mucuna	sqm	7,000	15,000
Umugwegwe/Sisal	pces	350	1,500
Umugano/Bambou	pces	300	2,000
Imiyenzi/Euphorbes	pces	500	1,000
Urugo rw'imiyenzi	sqm	500	3,000
Imihati	pces	500	1,500
Urugo rw'imihati	sqm	500	2,500
Urugo rw'imbingo cyangwa imiseke	sqm	1,600	3,000
Urugo rwa sipure	sqm	1,500	5,000
Imivumu	pces	6,000	20,000
Umuko	pces	1,000	10,000
Utundi duti tutavuzwe ariko twatewe	pces	600	1,000
Ikinobonobo/Ricin	pces	400	1,000