

**Rwanda Development Board
and
Nyungwe Management Company Ltd. of the
African Parks Network
Rwanda Wildlife Conservation Bond (WCB)
(P505213) Project**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

Negotiated Version

April 29, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The African Parks Network's Nyungwe Management Company (APN-NMC) and the Rwanda Development Board (RDB) (the Recipients) will implement the Rwanda Wildlife Conservation Bond Project (the Project). The International Bank for Re-construction and Development (the Bank), acting as the Trustee of Global Environmental Facility, has agreed to provide financing for the Project, as set out in the Legal Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipients agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the CEO of RDB and the Park Manager of APN-NMC specified in the Legal Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Maintain the the Project Implementation Units (PIUs) within the RDB and the APN-NMC with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project. The RDB Single Project Implementation Unit (SPIU) shall include at minimum a Social Specialist, an Environmental Specialist, and a Public Communications Specialist designated GMNP. The APN-NMC PIU shall include at minimum an Environmental and Social Safeguards Officer.</p>	<p>Establish PIUs in NNP and in GMNP no later than 30 days after the Effective Date, and thereafter maintain the PIUs and these positions throughout Project implementation.</p>	<p>APN-NMC and RDB-GMNP</p>

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>1. All capacity building activities and trainings shall be laid out in a plan embedded in the Environmental and Social Management Framework (ESMF). Training shall be provided to the PIU/SPIU, Project workers and contractors to ensure that the Project is carried out in accordance with this ESCP. Trainings shall be prepared and delivered in accordance with results of capacity assessment, in:</p> <ul style="list-style-type: none"> • World Bank ESSs; • Implementation of the Project Stakeholder Engagement Plan (SEP), including stakeholder mapping and engagement; • Specific aspects of Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) implementation. • Establishment and implementation of a Grievance Mechanism (GM); • Risks assessment and management at relevant Project sites; • Emergency Preparedness and Response; • Workers and community health and safety, including road safety and incidents reporting requirements; • Implementation of the Labor Management Procedures (LMP); • Prevention and addressing of gender-based violence and sexual exploitation and abuse (SEA) / sexual harassment; <p>2. Training for Project workers will be required on:</p> <ul style="list-style-type: none"> • Occupational health and safety, including preparedness and response arrangements to emergency situations • Workers' Grievance Redress Mechanism • Gender Analysis Plan (GAP) and the included anti-GBV/SEA/SH measures • LMP and Codes of Conduct • Process Framework (PF) • Social and Conflict Analysis (SCA) 	<p>Subproject/activity-specific trainings shall start 1 month following the commencement each specific activity and thereafter throughout Project implementation as prescribed in the project ESMF.</p>	<p>APN-NMC and RDB-GMNP</p>
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 25 days after the end of each reporting period.</p>	<p>APN-NMC and RDB-GMNP</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require and cause contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit any monthly reports to the Bank upon request. Submit the monthly reports to the Bank as annexes to the reports to be submitted under action C above.</p>	<p>APN-NMC and RDB-GMNP</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks; or serious incidents related to law enforcement and patrolling in accordance with an incident reporting protocol to be included in the Project Operations Manual (POM). Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	<p>APN-NMC and RDB-GMNP</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs 2. Prepare and implement the subproject/activity-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs), a full audit for the GMNP core zone expropriation once completed and a Resettlement Action Plan (RAP) (following ESS5 requirements) before considering activities in the National Park buffer zones, as set out in the ESMF. Any proposed subprojects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 3. Prepare and implement a Process Framework (PF) and a Social and Conflict Analysis (SCA) for the Project to assess, identify and manage any conflict related risks and impacts, including risks associated with community dynamics, land use, and human-wildlife interactions. 4. Develop and implement the conservation management action plan, park management plans, and chimpanzee action plans, consistent with the relevant ESSs. 	<ol style="list-style-type: none"> 1. Prepare the ESMF prior to the Effective Date and thereafter implement the ESMF throughout Project implementation. 2. Implement the PF and SCA throughout the Project implementation. 3. Prepare the subproject-activity-specific ESIAs/ESMPs and incorporate the ESIA/ESMP as part of the respective bidding documents for the respective Project activity prior to carrying out the Project activity that requires the preparation of such ESIA/ESMP. Once finalized, implement the ESIAs/ESMPs throughout Project implementation. Prepare a RAP prior to consideration of activities in the National Park buffer zones. 4. Develop the plans prior to the commencement of respective activities and implement such plans during the implementation of respective activities throughout Project implementation. 	<p>APN-NMC and RDB-GMNP (1-3) RDB-GMNP (4)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, and code of conduct, PF, and SCA, grievance and incident reporting mechanisms, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.</p>	
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>APN-NMC and RDB-GMNP</p>
	<p>ASSOCIATED FACILITIES- NO Associated Facilites have been identified.</p>	<p>N/A</p>	<p>N/A</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>Prepare and implement the Labor Management Procedures (LMP) for the Project, as part of the ESMF, to assess and manage potential labor risks, consistent with ESS2.</p>	<p>Same timeframe as for the preparation and implementation of the ESMF under action 1.1. above.</p>	<p>APN-NMC and RDB-GMNP</p>
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement Occupational Health and Safety Management Plan (OHS) measures, as part of the ESMF, to assess and manage the OHS risks and impacts of the Project.</p>	<p>Same timeframe as for the preparation and implementation of the ESMF under action 1.1. above.</p>	<p>APN-NMC and RDB-GMNP</p>
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the ESMF and consistent with ESS2.</p>	<p>Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>APN-NMC and RDB-GMNP</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the Project ESMF and subproject/activity-specific ESIAs/ESMPs, to manage waste, consistent with ESS3.</p>	<p>Same timeframe as for the preparation and implementation of the ESMF subproject/activity-specific ESIAs/ESMPs under action 1.1. above.</p>	<p>APN-NMC and RDB-GMNP</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Feasible measures (financially and technically) for improving efficiency in consumption of energy and water, as well as other resources and material inputs shall be identified through the specific ESMF and ESMPs(if needed) to be prepared under action 1.1.</p>	Same timeframe as specified in the preparation and implementation of the ESMF and subproject/activity-specific ESIAs/ESMPs of the ESMF as specified 1.1 above.	APN-NMC and RDB-GMNP
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required for specific Project activity ESMPs.</p>	Same timeframe as for the preparation and implementation of the respective subproject/activity ESMPs.	APN-NMC and RDB-GMNP
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMF and the subproject/activity-specific ESIAs/ESMPs to be prepared.</p>	Same timeframe as for the preparation and implementation of the ESMF as specified 1.1 above.	APN-NMC and RDB-GMNP
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Action Plan, to assess and manage the risks of SEA and SH.</p>	Prepare the SEA/SH Action Plan no later than the Effective Date and thereafter implement the SEA/SH Action Plan throughout Project implementation.	APN-NMC and RDB-GMNP
4.4	<p>SECURITY MANAGEMENT</p> <ol style="list-style-type: none"> 1. Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard Project workers, sites, assets, and activities as set out in the ESMF. 2. Adapt APN-NMC Law Enforcement and Security Standard Operating Procedure (SOP) into a variation SOP for law enforcement operations in GMNP (and RDB managed PAs). 	<ol style="list-style-type: none"> 1. Finalize the security risks assessment same time frame as for the preparation of ESMF(before effectiveness) and implement it through out project implementation <p>If the security situation changes during implementation, the project will update the security assessment report and prepare and implement a security management plan.</p>	APN-NMC and RDB-GMNP

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		2. Same timeframe as for the prepares and implements the ESMFs as specified 1.1 above .	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY			
5.1	<p>Process Framework</p> <p>Prepare and implement a Process Framework (PF) for the Project, consistent with ESS5.</p>	Implement the PF throughout the project implementation	APN-NMC and RDB-GMNP
5.2	<p>If, during implementation, it is identified that a subproject requires resettlement or based on findings from a full audit for the GMNP core zone expropriation, a Resettlement Action Plan (RAP) shall be prepared and implemented for the Gishwati National Park buffer zones (in alignment with 1.1. (2)).</p> <p>Any gaps feeling measures identified by the full audit at Gishwati will be implemented</p>	<p>The full audit will be finalized and disclosed before effectiveness of the project</p> <p>The gap filling measures as identified by the audit inside GMNP is implemented 1 month after effectiveness</p> <p>The RAP for the buffer zone at GMNP will be prepared before lunching bid and before investing any activity in the buffer zone that requires land acquisition</p>	RDB-GMNP
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Ensure all subprojects and site-specific activities are screened, in line with the screening procedures provided in the ESMF and consistent with ESS6 and implement appropriate mitigation measures.</p>	Same timeframe as for the preparation and implementation of the ESMF under action 1.1 above.	APN-NMC and RDB-GMNP
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>The Process Framework, ESMF, Conflict and Social Analysis indicate that no groups that meet the criteria of HMPs were identified as being physically or economically displaced by the Project. However, Identification and engagement of vulnerable groups will continue as project activity sites are confirmed with considerations of the established respective Community Committees of the NNP and GMNP</p>	Once the project activity sites are identified during project implementation	APN-NMC and RDB-GMNP
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Baseline survey and impact assessment as appropriate shall be undertaken in the course of the ESMF. Specific attention shall be given to both tangible and intangible cultural heritage affected by the project</p>	Same timeframe as for the preparation and implementation of the ESMF under action 1.1	APN-NMC and RDB-GMNP
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, for tangible and non tangible cultural heritage as part of the ESMF of the Project.</p>	Chance find procedures will be specified in the ESMF, as per 1.1. above.	APN-NMC and RDB-GMNP
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Adopt disclose and implement a Stakeholder Engagement (SEP) for the Project, which includes the conclusions and recommendations of the SCA, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt and disclose draft SEP prior to Appraisal. Update, redisclose, and implement the SEP throughout Project implementation.	APN-NMC and RDB-GMNP
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism by Effective date and thereafter maintain and operate the mechanism throughout Project implementation.	APN-NMC and RDB-GMNP
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>a) Recruitment and maintenance of E&S risk management team in the APN-NMC and RDB-GMNP SPIUs with an Environmental Specialist, Social Specialist, Ecosystem Management Specialist as well as the Driver designated to the Project.</p> <p>b) ESS1 Assessments (under 1.1):</p> <ul style="list-style-type: none"> • ESMF prepared duly consulted and disclosed by Project Effective date; • ESMP and other E&S risk management instruments prescribed by the project ESMF prepared, consulted and disclosed prior to start of subprojects/ site-specific activities • SCA prepared, consulted and disclosed by Appraisal • PF prepared, consulted and disclosed by Appraisal <p>10.1. SEP prepared duly consulted and disclosed by Appraisal.</p>			

