

# Simplified Approval Process

## Annex 12: Environmental and social action plan



Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget (USD)
1.0 Localised loss of soil material and sedimentation to the surface and/or groundwater systems from site due to earthwork activities	1.1 Develop and implement an Erosion, Drainage and Sediment Control Plan (EDSCP) for any surface works relating to soil and water conservation	Low	Contractor	Construction phase	Minimal soil loss and sedimentation	2,000
	1.2 Install and regularly inspect erosion and sediment control devices.			Construction phase		
	1.3 Schedule/stage works to minimise cleared areas and exposed soils at all times. Vegetate stockpiles if storage required for long periods.			Pre and during construction		
	1.4 Strip and stockpile topsoil for use during revegetation and/or place removed soils back on to agricultural lands.			Construction phase		
	1.5 Locate stockpile areas away from drainage pathways, waterways and sensitive locations.			Construction phase		
	1.6 Incorporate grassed buffer strips where necessary during construction to reduce water velocity			Construction phase		
	1.7 Remove excess sediment in all erosion and sediment control structures when necessary to allow for adequate holding capacity.			Pre and during construction		
2.0 Soil Contamination	2.1 Adherence to best practice for the removal and disposal of contaminated soil/ material from site (if required), including contaminated soil within the project footprints.	Low	Contractor	During construction	Soil contamination avoided or contained	200
	2.2 Avoid importing fill that may result in site contamination and lacks accompanying certification/documentation. Where fill is not available through on site cut, it must be tested in accordance with geotechnical specifications.			Pre and during construction		
3.0 Increase in dust levels at sensitive receptors	3.1 Manage dust/particulate matter generating activities to ensure that emissions do not cause an environmental nuisance at any sensitive locations through the user of water for dust suppression	Low	Contractor	During construction	Low dust levels and air quality maintained	500
	3.2 Implement scheduling/staging of proposed works to ensure major vegetation disturbance and earthworks are minimised.			During construction		

	3.3 Locate material stockpile areas as far as practicable from sensitive receptors. Cover if appropriate.			During construction		
	3.4 Source sufficient water of a suitable quality for dust suppression activities complying with any water restrictions.			Pre and during construction		
	3.5 Construction activities should minimise risks associated with climatic events (check forecasts).			During construction		
	3.6 Schedule revegetation activities to ensure optimum survival of vegetation species.			During construction		
4.0 Increase in vehicle /machinery emissions	4.1 Ensure vehicles/machines are switched off when not in use.	Low	Contractor	Pre and during construction	Air quality preserved	300
	4.2 Ensure only vehicles required to undertake works are operated onsite.			During construction		
	4.3 Ensure all construction vehicles, plant and machinery are maintained and operated in accordance with design standards and specifications.			Pre and during construction		
	4.4 Develop and implement an induction program for all site personnel, which includes as a minimum an outline of the minimum requirements for environmental management relating to the site.			Pre and during construction		
5.0 Increased noise levels	5.1 Specific noise reduction devices such as silencers and mufflers shall be installed as appropriate to site equipment.	Low	Contractor	Pre and during construction	Low noise levels	500
	5.2 Provide temporary construction noise barriers in the form of solid hoardings where there may be an impact on specific residents.					
	5.3 Minimise the need for and limit the emissions as far as practicable if noise generating construction works are to be carried out outside of the hours: 7am-5.30pm					
	5.4 All incidents complaints and non-compliances related to noise shall be reported in accordance with the site incident reporting procedures and summarised in the register.					

	5.5 Conduct employee and operator training to improve awareness of the need to minimise excessive noise in work practices through implementation of measures.					
6.0 Elevated suspended solids and other contaminants in surface water systems.	6.1 Designate areas for storage of fuels, oils, chemicals with compacted impermeable bases surrounded by a bund to contain any spillage. Refuelling to be undertaken in areas away from water systems.	Low	Contractor	During construction	Water quality in surface water systems preserved	200
	6.2 Conduct regular surface and groundwater quality monitoring in location where the groundwater is likely to be impacted including assessing the changes to groundwater quality.					
	6.3 Schedule works in stages to ensure that disturbed areas are revegetated and stabilised progressively and as soon as practicable after completion of works.					
	6.4 Avoid stockpiling construction materials in proximity to aquatic environment that may allow for release into the environment. Remove construction equipment from proximity to the aquatic environment at the end of each working day or if heavy rainfall is predicted					
	6.5 Minimise the use of herbicides, pesticides and other chemicals and use only biodegradable herbicides that have minimal impact on water quality and fauna. Use only as per directions		Smallholders	During agriculture seasons		
7.0 Increase of gross pollutants, into the groundwater	7.1 Conduct regular surface and groundwater quality monitoring in location where the groundwater is likely to be impacted, including assessing the changes to groundwater quality.	Low	Contractor	Pre and during construction	Ground water quality maintained	-
8.0 Habitat loss and disturbance of fauna	8.1 Limit vegetation clearing and minimise habitat disturbance through adequate protection and management of retained vegetation.	Low	Contractor	During construction	Minimal disturbance to habitats	500
	8.2 Minimise noise levels and intrusion in the vicinity of any sensitive locations.			During construction		
	8.3 Ensure that all site personnel are made aware of sensitive fauna/habitat areas and the requirements for the protection of these areas.			During construction		

	8.4 Minimise disturbance to on-site fauna and recover and rescue any injured or orphaned fauna during construction and operation.			During construction		
	8.5 Where earthworks are undertaken, rehabilitate the site with local provenance vegetation that provides habitat for fauna			Pre and during construction		
9.0 Introduced flora and weed/invasive species	9.1 Revegetate disturbed areas using native and locally endemic species that have high habitat value.	Low	Contractor	During construction	No alien/invasive species introduced	-
	9.2 Minimise disturbance to mature remnant vegetation, particularly canopy trees.			Pre and during construction		
10.0 Adverse impact on Land Ownership	10.1 Ensure all access is undertaken consistent with signed voluntary agreements	Low	Contractor	Pre and during construction	Land tenure and security respected	-
	10.2 Ensure full compliance with the IFAD's Social, Environmental and Climate Assessment Procedures Guidance on Displacement and Resettlement		PMU/ Contractor			
	10.3 All activities will be undertaken in full compliance with the Land Pooling and Readjustment Regulations 2018 and the GCF and IFAD's Policies		Contractor			
	10.4 Ensure compliance with the Grievance Redress Mechanism process		PMU	Pre and during construction		
11.0 Gender discrimination	11.1 Ensure the project integrates gender equality and women empowerment in all activities	Low	PMU/implementing partners			-
	11.2 Ensure the project does not have any gender-based discrimination and/or inequalities		PMU/implementing partners			
	11.3 Where practicable, preference should be given to women for any employment		Contractor			
12.0 Poor Employment, Labour and Working Conditions	12.1 Ensure compliance with Burundi labour and occupational health and safety laws and Good International Industry Practice with respect to labour and occupational health and safety	Low	PMU/Contractor	Pre and during construction	Decent working and labour conditions	500
	12.2 Ensure workers' health and safety is protected and overall well-being benefits derived from the project		Contractor			

	12.3 Ensure workers are trained in occupational health and safety in compliance with Burundi laws and Good International Industry Practice		Contractor			
	12.4 Ensure workers are provided appropriate personal protective equipment suitable for their duties		Contractor			
13.0 Damage or disturbance to significant important Archaeological, Indigenous and/or Cultural Heritage during the earth disturbances and land clearing activities	13.1 Should any important Archaeological, Indigenous and/or Cultural Heritage sites, immediately cease work within the area that the site has been observed and consult with the relevant Museum/traditional owner groups, IFAD and archaeologist available for implementation during construction.	Low	Contractor	Pre and during construction	No damage or disturbance to archaeological, indigenous and/or cultural heritage sites	-
14.0 Production of wastes and excessive use of resources	14.1 Preference shall be given to materials that can be used to construct the project that would reduce the direct and indirect waste generated or enable recycling. 14.2 Separate waste streams shall be maintained at all times i.e. general domestic waste, construction and contaminated waste. Specific areas on site shall be designated for the temporary management of the various waste streams. 14.3 Any contaminated waste shall be disposed of at an approved facility. Disposal of waste shall be carried out in accordance with the government of Burundi requirements. 14.4 Recyclable waste (including oil and some construction waste) shall be collected separately and disposed of correctly. 14.5 Fuel and lubricant leakages from vehicles and plant shall be immediately rectified.	Low	Contractor	During construction	No pollution or public nuisance resulting from waste	200
15.0 Fire hazard	15.1 Flammable and combustible liquids bunding/storage areas to be designed in	Low	Contractor	During construction	Fire hazard minimised	300

	accordance with appropriate international standards					
	15.2 Fire extinguishers are to be available on site					
	15.3 No open fires are permitted within the project area					
	15.4 Communication equipment and emergency protocols to be established prior to commencement of construction activities					
	15.5 Train all staff in emergency preparedness and response (cover health and safety at the work site).					
	15.6 Check and replenish First Aid Kits					
	15.7 Use of Personal Protection Equipment					

*\*Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses “expected, highly likely, moderately likely, not likely, and slight”). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, “critical, severe, moderate, minor, and negligible”). A significance value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts. There is no single technique to determine the significance of risks nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.*

The environmental and social risks identified in the table below, will result mainly from the soil and water conservation activities as part of the landscape management, installation of water harvesting structures and the agricultural productivity activities. The works related to installation of water harvesting structures will be small scale and risks localized.

A stakeholder engagement plan will be implemented. Stakeholders will be engaged through launching workshops and town-hall type meetings in the project locations. The beneficiaries will be engaged through sensitization sessions on the project activities including expectations of their participation and steps of how they can register their interest to participate. The sensitization will be followed by community mobilization including the geographical and direct targeting of the beneficiaries. The training and capacity building sessions such as the farmer field schools will ensure regular engagement of the target beneficiaries. Other stakeholder engagement fora will include the annual planning and progress review meetings at the central level and quarterly sessions at the local levels.

A Grievance Redress Mechanism has been elaborated for the PNSADR-IM, which is implemented in the same geographic area. The already established GRM that builds on existing structures, which is outlined below, will apply to this project.

Burundi has set up a platform named “Groupe de Plaidoyer Agricole” (GPA) an informal but recognized body at the national level with local ramifications to settle all disputes and conflicts at community level on agricultural related matters. Any grievances are channelled through the GPA and issues discussed in during scheduled sessions based on demand. Land related issues are settled by another platform called

"Synergie Foncière" in collaboration with GPA. Both platforms operate in the local languages, maintain records of the grievances and how they have been resolved and collaborate with the administrative authorities on mediations. The administrative authorities also maintain records of grievances received and how they have been addressed. If the grievances cannot be settled or complainants are dissatisfied the matter can be escalated the Ombudsman.

In case of confiscation, the procedure remains the same, the claimant has recourse to the administrative hierarchy for mediation starting with the Synergie Fonciere, but in case of dissatisfaction, the claimant has recourse to the judicial authorities, or to the National Commission for Land and Other Property (CNTB) at the first degree (at the provincial level) and if necessary, at the second degree (at the national level), there is even a special court for land and other property.