Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/05/2019 | Report No: ESRSA00189
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rwanda</td>
<td>AFRICA</td>
<td>P168551</td>
<td></td>
</tr>
</tbody>
</table>

Project Name: Quality Basic Education for Human Capital Development Project

Practice Area (Lead): Education

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 5/27/2019

Estimated Board Date: 7/30/2019

Borrower(s): Ministry of Finance and Economic Planning (MINECOFIN), Republic of Rwanda

Implementing Agency(ies): Ministry of Education (MINEDUC), Republic of Rwanda

Proposed Development Objective(s):
The PDO is to improve teacher competency and student retention and learning in basic education in Rwanda.

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
</tr>
</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

ISSUES TO ADDRESS: Despite impressive gains in basic education, Rwanda faces key challenges. Only 21 percent of children are enrolled in pre-primary education, and only 45 percent of students in grade 2 and grade 5 meet grade level expectations for Kinyarwanda and English, respectively. There is a weak progression in early grades, and low transition from primary to lower secondary education (71 percent). Moreover, there are inadequate learning materials and facilities; there is a shortage of infrastructure and primary classrooms are overcrowded, with some classrooms filled with 80–90 students. There is weak progression in early grades of primary school, and low transition from primary to lower secondary (71 percent). Teacher Training Colleges are poorly resourced and supported and as a
result, the graduates are not ready to provide quality teaching. English is the language of instruction from grade 4 onward, but both teachers and students struggle to acquire a level of English language proficiency required for teaching-learning success. There is also a scarcity of qualified teachers in mathematics and science. Education currently spends only 5 percent of total GDP, which is low for a country like Rwanda with a large population of children and youth, partially resulting in very low primary teacher salaries. In addition, Rwanda is not yet participating in regional and international learning assessments, making it difficult to benchmark and track progress as compared to other countries.

PDO: To improve teacher competency and student retention and learning in basic education in Rwanda.

PROPOSED PROJECT: The proposed project (IPF) aims at overcoming some critical constraints to student progression and learning in basic education in Rwanda. The project focuses on the following principles: (1) aligning with the Education Sector Strategic Plan (ESSP) and coordinating with development partners’ programs and initiatives; (2) targeting critical areas to achieve transformational change in basic education; (3) using technology and innovative approaches for accelerated learning and improved classroom practice; and (4) building models and scaling up successful pilots for system-wide impact.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The proposed scope of the project will be focusing on key education development priorities identified by MINEDUC, REB and other stakeholders, and will be organized in four components. Activities within these components will leverage the innovative approaches currently being piloted in the country and will focus on the use of technology to bring about transformative change in the basic education sector. Specifically, the project will prioritize learning to build a solid human capital foundation, target critical areas to achieve transformational change in basic education, and use technology to create an enabling environment and tools for accelerated learning and improved classroom practice. Additionally, it will build model schools and scale up successful pilots and align with the Education Sector Strategic Plan (ESSP) and coordinate with programs and initiatives of development partners. The project sites will be primary, secondary schools and TTCs located in the 30 Districts across the Country. The specific schools in each District to benefit from this project are yet to be identified. The project activities under component 1, 2 and 3, will involve rehabilitation and construction of new class-rooms, new satellite schools, toilets, laboratories, supply of ICT equipment’s, development of e-learning platforms. Rehabilitation of existing structures will involve civil works. Under component 1, subcomponent 1, the objective of this sub-component is to improve teaching by creating a dynamic network of 17 demonstration schools to support TTC students’ practice training and develop new knowledge about teaching and instructional leadership. Sixteen comprehensive schools near 16 Technical Teachers Colleges (TTCs) and 1 school where University of Rwanda-College of Education (URCE) is located will be developed as demonstration schools. There are two main activities: (i) Building the capacity of the demonstration schools in order to effectively play their roles; and (ii) Supporting TTCs and disseminating innovative teaching and learning practices to other schools in the country. School infrastructure will be improved to ensure that each demonstration school has the facilities appropriate for the teaching and learning needs of a comprehensive school as well as the facilities necessary for the production and dissemination of innovative teaching and learning strategies to other schools. This will include a conference room for use by visiting trainers and teachers, video facilities for recording model lessons, and for use by mentors and subject heads, a 3-classroom preschool block, basic teaching and learning materials, textbooks and
supplementary reading books, equipment for science/ICT/language laboratories, and supplementary teaching and learning materials.

Under component 2, the project will improve the school environment to support student learning. Critical issues of overcrowding, double-shifting, and long distances to schools will be addressed through the construction of additional classrooms in existing public schools. Under subcomponent 2.1 activity 1, the project will finance about 8,000 additional furnished primary classrooms in existing public schools to reduced overcrowding. An additional 12,000 latrines will also be financed at the same time on the same sites according the national standard of 1.5 latrine per classroom. The project will target overcrowded schools with the objective to build the required number of classrooms. The number of targeted schools is more than 1400, corresponding to about half of the primary schools in the Country, and the average number of classrooms per school to add would be about 7. According to this methodology, the targeted schools are distributed in all Districts. For the largest schools, currently with over 20 classrooms, the option to build the additional classrooms in a separate nearby new school, rather than in the existing one, will be considered.

Under activity 2, the project will build new schools, MINEDUC has developed the concept of “satellite” primary schools temporarily attached to a neighborhood “mother” primary school for administrative purposes, gradually developed by phases until the school has grown up enough to become a full-fledge primary school and can administratively be detached from the mother school. As a first phase, the standard new “satellite” school is composed of 4 classrooms and a block of 6 latrines. Districts and Sectors has identified a list of 165 sites where the construction of new schools is a crucial action to improve attendance and decrease drop out by reducing distance to school. An estimated 79,000 children would benefit from this sub-program, comprising about 2,000 classrooms and 3,000 latrines, which will be built under the Unconventional Approach.

New classrooms to be constructed under this project will be dispersed in various schools in rural areas. The civil works activities will be confined within the school land that belongs to the GoR and hence no land acquisition anticipated under this project. However, experience from the Human Resources Development Program funded by the bank in 2000 in Rwanda, the ICR indicated that rehabilitation and constructions of new classrooms in existing schools encountered the issue of encroachers who had cultivated the vacant school land. The Resettlement Policy Framework (RPF) prepared for this project has identified some social issues relate to the proposed subproject activities to include, land acquisition, squatters, illegal settlers and potential need for voluntary land donation for government aided schools that comprise 71% of the benefiting schools in this project. All those issues have been identified and social risk mitigation measures have been proposed and mainstreamed in the project design and implementation arrangement.

D. 2. Borrower’s Institutional Capacity

The Ministry of Education (MINEDUC), will be the key implementing agency under the project. The University of Rwanda-College of Education (UR-CE), and Rwanda Education Board (REB) will be key stakeholders in the implementation of this project. The project would be led at the strategic level by the MINEDUC’s Project senior management team (the Minister, the Minister of State, the PS of MINEDUC, DG of REB, and Dean of UR-CE), and coordinated by the Single Project Implementation Unit (SPIU) within MINEDUC. The MINEDUC SPIU currently has a project coordinator and a monitoring and evaluation specialist, but the unit needs additional staff to meet fiduciary, environmental and social standards compliance requirements. MINEDUC has no experience in implementing a World Bank- financed IPF project. The recent Bank operation they have been involved in, is a program for results on enhancing priority skills for growth; and it lacked significant compliance requirements in terms of implementing Bank safeguards policies. The MINEDUC SPIU does not have experience working with the World Bank Environmental and
Social Standards (ESS); and does not have the required environmental and social development personnel to oversee the preparation and implementation of the required ESS instruments. The MINEDUC SPIU will recruit two Environment and Social and Social Standards staff at SPIU level (one environment and one social) by July 2019 and these two staff will provide technical support to the other project implementation partners. At the District level, MINEDUC will recruit 15 Environment and Social Standards Officers. Each staff will be assigned 2 Districts to follow-up on project implementation and compliance to ESS requirements and national environmental laws. The SPIU staff would need to be trained in the World Bank ESF and relevant procedures. Mentoring and intensive implementation support would also be needed, particularly in the early stages of implementation. The ESS capacity needs for the districts and sectors implementing the project, has been incorporated into the project activities and allocated the required resources in the project subcomponent 3.2. The Project subcomponent 3.2 specifically aims to finance and support project management and build implementation capacity in the Single Project Management Units (SPIUs) at the Ministry of Education (MINEDUC) and the Rwanda Education Board (REB) to ensure effective execution of the project.

To do so, the Project will (i) finance key staff in SPIUs at MINEDUC and REB in key functions, including environmental and social standards officers, and operations and planning throughout the project implementation period, motor vehicles, and motorcycles for field visits. Financing is budgeted to support Monitoring and Evaluation activities, including workshop for project stakeholders to understand project planning, reporting requirements, (ii) support training of MINEDUC SPIU and REB SPIU staff in the areas of project sensitization of stakeholders to raise their awareness of gender, citizens’ engagement, environmental and social issues, climate disaster management, and co-benefits of climate change mitigation, (iv) fund training workshops based on relevant World Bank standards, guidelines and frameworks.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The project proposes, under component 1 and 2, to undertake works for basic infrastructure for improved learning conditions. The civil works will include rehabilitation of existing classrooms and facilities, construction of additional classrooms and new satellite schools. These works will pose a moderate threat to the environment. The project potential risks and impacts to the environment, are typical to construction activities and manageable within the confines of the construction sites.

Social Risk Rating

The SRR is Substantial at this stage because, there are significant adverse social risks and impacts related to this project. The primary social risks include; significant land acquisition required for the construction of new schools on over 165 new sites, land required for also for construction additional 8000 classrooms and 12000 toilets on existing schools given land scarcity issues in Rwanda, the existence of some encroachers on existing school land that would required compensation, the "unconventional approach" of project implementation approach poses labour
management risk that requires clear mitigation measures. All these risks are considered substantial at this stage and proportionate mitigation measures have been proposed for this project.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

*Overview of the relevance of the Standard for the Project:*

The Project proposes to undertake basic infrastructure works for improved learning conditions. Most of the construction works, expected to be implemented within the existing schools’ boundaries, will include the rehabilitation of existing school buildings and construction of additional classrooms. The Project will also construct new satellite schools (estimated at 400) with an average of 5 classrooms per school. The potential environmental and social risks and impacts from the works are expected to be typical construction works associated risks and impacts that may include noise, dust emissions, vegetation clearance, soil erosion, accidents and injuries. It is likely that the construction of new schools will require land acquisition. The volume of construction works raises the risk of Sexual Exploitation and Abuse (SEA) that will have to be addressed during implementation. However, these risks will have to be addressed in the site specific Environmental and Social Management Plans by incorporating mitigation actions to be implemented during Project execution.

An Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been prepared and that has assessed the potential environmental and social risks and impacts. The ESMF and RPF will provide guidance on mainstreaming environmental and social issues in school construction and rehabilitation works. As the details of Project activities and precise locations of implementation sites are yet to be determined, the ESMF and RPF give recommendations on the preparation of the corresponding site-specific Environmental and Social Management Plans (ESMP) and Resettlement Action Plans, as appropriate. A Stakeholder Engagement Plan (SEP) has also been prepared. It will guide the project on stakeholder engagement and information to be shared or disclosed, throughout the Project cycle i.e. Project preparation and execution. A Labor Management Procedure (LMP) has also been prepared to guide all labor related issues under this operation (as per the national laws and the bank ESS2 requirements).

The MINEDUC Single Project Implementation Unit (SPIU) has held several consultation meetings with the education sector stakeholders to introduce the project and get feedback that continue to inform the project design and selection of schools for project implementation.

The MINEDUC SPIU proposes to use a construction methodology (called “unconventional approach”) that relies heavily on voluntary community participation. This method has successfully been applied by the Government of Rwanda to build several thousand classrooms in the last 10 years. This method has been improved with the involvement of different development partners to address their corresponding requirements. To ensure compliance with Environment and Social Standard 2 on labor and working conditions, the unskilled labor under this project to be on the project site daily, will be contracted workers with a signed contract and an agreed daily payment fee, instead of the voluntary free labor applied under typical “unconventional approach” under Umuganda. However, the voluntary labor offered during the last Saturday of every month by the entire community will be used where necessary under this project.
Land availability is another issue identified for more than a third of the targeted sites, where school land will need to be acquired through expropriation. For Activity 1, the scope of the land availability issue is largely limited to “public schools” (only 29% of the total number of schools). The remaining schools (71%) are government-aided schools built on land belonging to various religious denominations who are important land owners. MINEDUC, through Districts, will engage them to explore the possibility of voluntary land donation for construction of additional classrooms. The engagement of these key stakeholders is part of the Stakeholders Engagement Plan (SEP) that will be done at each district, and the results of this exercise will be documented and shared with the Bank.

As for Activity 2, one third of the proposed new public primary schools require land acquisition. As all sites are identified, once the benefitting schools are also identified, MINEDUC will conduct a detailed evaluation of the land situation of these schools. At sites with no land acquisition requirement, new school construction will be prioritized to start civil works in the first year, while new schools with the need for land acquisition will be constructed in the second year of the Project implementation (after preparing Resettlement Action Plans (RAPs) and full compensation of affected households).

ESS10 Stakeholder Engagement and Information Disclosure

The project implementation will involve several stakeholders that include the following, MINEDUC, REB, UR- CE, TTCs, Schools, Digital Media Institute, Districts, squatters, community members around the schools, parents associations, NGOs, People with disabilities (PWDs) and Districts. The client (MINEDUC) has prepared a SEP as part of the project preparation and implementation. The SEP builds on existing community engagement platforms such as "Umuganda, Akagoroba kababyeyi" among other fora to engage community members. The SEP will provide details on how this will be done in practice including the setup of the Grievance Redress Mechanism (GRM). The RPF, ESMF, SEP all have established the list of stakeholders that will be engaged during project implementation. The key stakeholders so far identified are the usual sector players that include the Ministry of Education (MINEDUC); Rwanda Education Board; and University of Rwanda. The stakeholders at the level of decentralized governance units i.e. districts, sectors and NGOs operating in each District.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Anticipated key labor risks and impacts are mainly associated with the planned construction works. There may be instances of child labor associated with the use of local labor. The client must provide appropriate measures for the protection of vulnerable project workers such as women and people with disabilities. The majority of those involved will be existing government civil servants. As such, these employees will remain subject to the terms and conditions of their existing public-sector employment. Workers to rehabilitate, construct additional class rooms and new satellite schools are likely to be few in number but may require skilled workers from outside of the area of work, e.g.
for the installation of technical equipment). Due to the discreet nature of these activities labor camps and influx are not anticipated. These individuals will however be subject to the requirement of ESS2 in relation to labor and working conditions including occupational health and safety and grievance mechanisms. Likewise, any technical consultants contracted by the Project will also need to adhere to such standards. To ensure health and safety of workers during the construction and operational phases of the project, a Health, Safety and Environmental (HSE) plan in line with Good International Industry Practice (GIIP) will be prepared as part of the ESMF. During operation, this will include detailed requirements for the transport, handling and disposal of chemicals/ reagents and other hazardous materials. The plan will include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers. In addition, the project will need to develop and implement written labor management procedures that will set out the way in which project workers will be managed. The LMP will be prepared prior to appraisal for this project.

ESS3 Resource Efficiency and Pollution Prevention and Management

Relevance of this ESS will be further assessed. The project design could explore the use of hydra-form bloc technology where possible and limit the use of baked bricks during classroom construction to reduce the need for firewood, avoiding detrimental impacts on the environment. The classroom rehabilitation activities could explore landscaping to prevent erosion and planting of sapling shade trees, re-vegetation which contribute towards the carbon sequestration process and reducing soil run off. Using energy saving bulbs for the school lighting or solar should also be considered. The following will be further assessed: • Promoting the sustainable use of construction materials and other raw materials extracted from the natural environment; • Promoting sustainable use of water and energy resources. The project could consider installing tanks for rain water storage to supplement current water supply or alternative energy solution for cooking fuel; and • Adoption of good practices for managing e-wastes.

There is also a potential of rehabilitation activities that could involve demolition or replacement of existing infrastructure’s containing hazardous materials such as asbestos and the ESMF include Rwanda Environmental Management Authority (REMA) guidelines and measures to consider for removal and disposal of hazardous materials such as asbestos.

ESS4 Community Health and Safety

As the project will involve civil works, the community health and safety issues related to this project could potentially include, sexual exploitation and abuse given the fact that the construction work will be carried out in existing schools for additional classrooms. The project design to ensure consideration for the universal access in toilet/latrine construction, and in all new school building to be constructed under this project, for disability and inclusive education.

Toilets construction will also require portable water where possible to improve hygiene in and around schools. However, in case the toilets to be constructed are pit latrines, such latrines in schools especially in rural areas are usually not clean and represent a potential health risks to students and the surrounding community. Gender-Based Violence (GBV) or Sexual Exploitation and Abuse (SEA) of students which may arise from interactions with
construction workers; and Incidences of increased erosion, runoff and landslides affecting local community properties.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land availability is an issue identified for more than a third of the targeted sites, where school land will need to be acquired through expropriation. For activity 1, the scope of the land availability issue is largely limited to “public schools” that are only 29% of the school total. The remaining schools (71%) are government-aided schools built on land belonging to various religious denominations who are important land owners and MINEDUC through Districts will engage them, to explore the possibility of voluntary land donation for construction of additional classrooms. The engagement of these key stakeholders is part of the Stakeholders Engagement Plan (SEP) that will be done at each district, and the results of this exercise will be documented and shared with the bank.

As for Activity 2, one third of the proposed new public primary schools require land acquisition. MINEDUC will conduct a detailed evaluation of the land situation of all targeted schools once the benefiting schools are identified. The sites with no land acquisitions requirement, civil works will commence in the first year, while new schools with the need for land acquisition, construction will start in the second year of the project implementation after preparing Resettlement Action Plans (RAPs) and full compensation of affected households.

The client has prepared the RPF that guide the project implementation to address the risks mentioned under this standard.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project is not anticipated to have activities with impacts on biodiversity or living natural resources. The project implementation sites will be located in modified landscapes i.e. already used for schools, training centers and universities. However, the ESMF include specific measures to avoid or minimize this negative impacts. At this stage the ESS6 is not relevant.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Relevance of this ESS will be further assessed. At this stage the project sites are not yet finalized. We expect to explore the relevance of this standard as we get more information especially about selected locations for the subproject sites.

ESS8 Cultural Heritage

Although no impacts to cultural heritage are anticipated, the project has incorporated “chance find” procedures in the ESMF when physical cultural resources are encountered during construction. At this stage, ESS 8 is not relevant.

ESS9 Financial Intermediaries
Relevance of this ESS will be further assessed during project preparation as part of the ESA process. The project is not anticipated to have Financial Intermediaries as project implementation entities.

B.3 Other Relevant Project Risks

Preliminary assessment does not indicate high reputational and/or political economy risk that could adversely influence or hinder the project from achieving environmental and social standards compliance. This will further be assessed.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways  No

OP 7.60 Projects in Disputed Areas  No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td>10/2019</td>
</tr>
<tr>
<td>Establish an organizational structure with qualified staff to support management of Environment and social risks. Recruit two (2) E&amp;S staff at MINEDUC PIU level and 15 E&amp;S at District level.</td>
<td>10/2019</td>
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<tr>
<td>Prepare an ESMF</td>
<td>05/2019</td>
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<tr>
<td>Obtain ESIA clearance from Rwanda Development Board (RDB) as required by the Rwanda Environmental laws.</td>
<td>08/2019</td>
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<tr>
<td>Capacity building of MINEDUC/PIU, REB and District level Environment and social Standard's Officers in environment and social risk management, land acquisition, environment and social safeguards monitoring and reporting and other relevant areas related to this project.</td>
<td>11/2019</td>
</tr>
<tr>
<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
<td>09/2019</td>
</tr>
<tr>
<td>Consolidate all existing grievance redress channels into a single grievance mechanism for the project</td>
<td>09/2019</td>
</tr>
<tr>
<td>Conduct annual citizen feedback surveys</td>
<td>11/2020</td>
</tr>
<tr>
<td>ESS 2 Labor and Working Conditions</td>
<td>05/2019</td>
</tr>
<tr>
<td>Labor Management Procedure.</td>
<td>05/2019</td>
</tr>
<tr>
<td>Establish and maintain a Grievance Redress Mechanism for the project workers</td>
<td>11/2019</td>
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<tr>
<td>Occupational Health and Safety (OHS). Develop and implement OHS measures</td>
<td>11/2019</td>
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<tr>
<td>Emergency preparedness and response. As part of the OHS measures, include measures on emergency preparedness and response, and ensure</td>
<td>11/2019</td>
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<tr>
<td>Project Workers training. Implement a training of project workers designed to create awareness' raising of risks and mitigation impacts on local communities</td>
<td>11/2019</td>
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**ESS 3 Resource Efficiency and Pollution Prevention and Management**

Management of waste and hazardous materials. Develop and implement measures and actions to manage waste and hazardous materials from school laboratories | 11/2019 |

**ESS 4 Community Health and Safety**

Not relevant at this stage

**ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Prepare the RPF | 05/2019 |

Prepare the Resettlement Management Plans (RAPs) | 11/2019 |

Prepare VLD reports where applicable | 11/2019 |

**ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Not relevant at this stage

**ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

Not relevant at this stage

**ESS 8 Cultural Heritage**

Not relevant at this stage

**ESS 9 Financial Intermediaries**

Not relevant

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**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?**  
No
Areas where “Use of Borrower Framework” is being considered:
The project will rely on the Bank ESF during project preparation and implementation.

IV. CONTACT POINTS

World Bank
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Borrower/Client/Recipient
Borrower: Ministry of Finance and Economic Planning (MINECOFIN), Republic of Rwanda

Implementing Agency(ies)
Implementing Agency: Ministry of Education (MINEDUC), Republic of Rwanda

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Lianqin Wang
Practice Manager (ENR/Social) Robin Mearns Cleared on 05-Jun-2019 at 12:12:41 EDT