

# **STRATEGY AND CORPORATE SERVICES DIRECTORATE**

## **STAKEHOLDER ENGAGEMENT PLAN FOR THE LUSAKA TRANSMISSION AND DISTRIBUTION REHABILITATION PROJECT**



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## LIST OF ACRONYMS

Abbreviation	Full Definition
BID	Background Information Document
CBO	Community Based Organizations
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ERM	Environmental Resources Management
EP	Equator Principle
ESMP	Environmental and Social Management Plan
FGDs	Focus Group Discussions
IA&Ps	Interested and Affected Parties
IFC	International Finance Corporation
KII	Key Informant Interviews
NGOs	Non-Governmental Organizations
NTS	Non-technical Summary
SEP	Stakeholder Engagement Plan

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## **1.0 INTRODUCTION**

This Stakeholder Engagement Plan (SEP), has been developed to inform and guide the ESIA stakeholder engagement process for the Lusaka Transmission and Distribution Rehabilitation Project (LTDRP). It seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goals are to ensure that adequate and timely information is provided to Project Affected Parties (PAPs) and other stakeholders, that these groups are given sufficient opportunity to voice their opinions and concerns, and that these concerns influence project decisions.

The SEP for the Project is a “living document” that will be updated and adjusted as the ESIA progresses and project planning evolves. It thus provides – and will continue to provide – a framework to manage effective and meaningful engagement with stakeholders.

### **1.1 PURPOSE OF THE STAKEHOLDER ENGAGEMENT PLAN**

The overall aim of this Plan is to ensure that a consistent, comprehensive, coordinated and culturally appropriate approach is taken to stakeholder engagement and project disclosure. It is intended to demonstrate the commitment of ZESCO Limited to national legal requirements as well as international best practice approach to engagement. ZESCO is committed to full compliance with all Zambian Environmental Impact Assessment (EIA) Regulations. The applicable legislation on stakeholder engagement is the Environmental Management Act (EMA), No. 12 of 2011, pursuant to Statutory Instrument No. 28 of 1997, the EIA Regulations. In addition, ZESCO will align itself to the European Investment Bank (EIB) Safeguard Policies and World Bank (WB) Operational Safeguards.

In line with current international best practice, this SEP aims to ensure engagement that is free of manipulation, interference, coercion and intimidation.

To this end the SEP:

- outlines the approach to be adopted to engagement, showing how this will be integrated into the rest of the ESIA process;
- identifies stakeholders and mechanisms through which they will be included in the process;
- serves as a way to document the process; and
- Identifies ZESCO’s responsibilities with respect to Zambian legislative requirements and international best practice.
- This Plan focuses on stakeholder engagement activities proposed for the ESIA process and should be expanded upon for subsequent project phases.

### **1.2 OBJECTIVES OF STAKEHOLDER ENGAGEMENT**

The objectives of engaging stakeholders during the ESIA process include the following:

- **Ensuring understanding:** An open, inclusive and transparent process of culturally appropriate engagement and communication to ensure that

stakeholders are well informed about the proposed Project Disclosure of information will be as early and as comprehensively as possible.

- **Involving stakeholders in the assessment:** Stakeholders will be included in the scoping of issues, the assessment of impacts, the generation of mitigation and management measures and the finalisation of the ESIA reports. They will also play an important role in providing local knowledge and information for the baseline to inform the impact assessment.
- **Building relationships:** Through supporting open dialogue, engagement will help establish and maintain a productive relationship between the ESIA team and stakeholders.
- **Engaging vulnerable groups:** An open and inclusive approach to consultation increases the opportunity of stakeholders to provide comments on the proposed Project, and to voice their concerns. Some stakeholders however, need special attention in such a process due to their vulnerability. Special measures will be considered to ensure that the perspectives of vulnerable stakeholders are heard and considered.
- **Managing expectations:** It is important to ensure that the proposed Project does not create or allow unrealistic expectations to develop amongst stakeholders about proposed Project benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.
- **Ensuring compliance:** The process is designed to ensure compliance with both local regulatory requirements and international best practice.
- One of the key outcomes of engagement should be free, prior and informed consultation of stakeholders, where this can be understood to be:
  - **Free:** engagement free of external manipulation or coercion and intimidation;
  - **Prior:** engagement undertaken in a timely way, for example the timely disclosure of information before a development is undertaken and/ or participation is sought with regard to the identification of issues of concern; and
  - **Informed:** engagement enabled by relevant, understandable and accessible information.

### **1.3 STRUCTURE OF THE PLAN**

The SEP is organised in the following subsequent sections.

Chapter 2 outlines the national and international legislative context that will govern the manner in which stakeholder engagement is conducted for the ESIA engagement process.

Chapter 3 provides an overview of the likely stakeholder groups that will be interested in or affected by the proposed Project

Chapter 4 proposes an engagement process that will comply with the national and international standards.

Chapter 5 outlines the ESIA Scoping stakeholder engagement process that was undertaken and the proposed way forward.

Chapter 6 outlines the feedback mechanism that was developed through the stakeholder engagement process.

Chapter 7 presents an overview of how records of the process will be kept and monitored.

## **2.0 KEY STANDARDS AND LEGISLATION GUIDING STAKEHOLDER ENGAGEMENT**

### **2.1 INTRODUCTION**

The stakeholder engagement process has been designed to ensure compliance with Zambian legislative requirements, WB Operational Policies and the EIB Environmental and Social Standard No.10 on stakeholder engagement as well as international best practice.

This section presents the relevant standards and legislation identifying the key Zambian and international requirements for engagement. The following section will present the process that has been designed to meet these standards.



### **3.0 LEGAL FRAMEWORK**

In Zambia, the Environmental Management Act No. 12 of 2011 pursuant to Statutory Instrument No. 28 of 1997, the EIA Regulations are the key legislation that notes the requirements for stakeholder engagement in the ESIA process.

The Environmental Management Act No. 12 of 2011 notes that the public have the right to be informed of the intention of public authorities to make decisions affecting the environment and of available opportunities to participate in such decisions. The legislation obliges the developer to consult with the public: "the Agency and the appropriate authorities shall establish mechanisms to collect and respond to public comments, concerns and questions relating to the environment including public debates and hearing".

The 1997 EIA Regulations states that stakeholder engagement needs to involve government agencies, local authorities, non-governmental and community based organisations and interested and affected parties.

"The developer shall, prior to the submission of the EIS to the Agency, take all measures necessary to seek the views of the people in the communities which will be affected by the project. In seeking the views of the community in accordance with sub-regulation, the developer shall:

- (a) Publicise the intended project, its effects and benefits, in the mass media, in a language understood by the community, for a period not less than fifteen days and subsequently at regular intervals throughout the process; and
- (b) after the expiration of the period of fifteen days, referred to in paragraph (a), hold meetings with the affected communities to present information on the project and to obtain the views of those consulted".

The Zambia Environmental Management Agency (ZEMA) is responsible for distributing the ESIA report for public comment. The public are notified via the media including radio. Public meetings may be called, as advertised in the media. Media notices shall be published three times a week for two consecutive weeks in the national papers at least fifteen days prior to the public hearing. Comments can be received 20 days from the date of the last media notice however, the Agency may extend this period up to a period of 15 days. Such hearings can only be scheduled twenty-five days after the last public notification.

## **4.0 INTERNATIONAL REQUIREMENTS**

In addition to aligning to Zambian requirements and standards, the SEP is designed to ensure alignment with international good practice standards, in particular the WB and EIB Environmental and Social Standard No.10 on stakeholder engagement.

The following section sets out the engagement-specific requirements aligning to international good practice standards.

### **4.1 THE WB AND EIB ENVIRONMENTAL AND SOCIAL STANDARDS**

The following section sets out the engagement-specific requirements aligning to international good practice standards.

#### **4.1.1 EIB Environmental and Social Standard 10: Stakeholder Engagement**

A meaningful engagement process allows for the efficient implementation of a financed operation and, in particular, the early and effective identification, assessment, and management of any environmental and social risks, impacts, and opportunities. The views, interests, and concerns of project affected communities and other interested stakeholders are heard, understood, and taken into account throughout the project lifecycle.

Standard 10 outlines a systematic approach to stakeholder engagement that the promoter is expected to build and maintain by way of a constructive relationship with relevant stakeholders. Stakeholder engagement is an inclusive and iterative process that involves, in varying degrees, stakeholder analysis and engagement planning, timely disclosure and dissemination of/access to information, public consultations and stakeholder participation, and a mechanism ensuring access to grievance and remedy.

##### **4.1.1.1 Overarching Requirements**

Stakeholder engagement will be planned for and carried out by the promoter without discrimination, taking into account differences in risk exposure and the increased sensitivity and reduced resilience of vulnerable groups in line with Standard 7- Rights and Interests of Vulnerable Groups.

Stakeholder engagement, including disclosure and dissemination of information, will be planned for and carried out in line with the principles of prior, informed and free engagement and informed participation, in order to lead to broad community support by the affected communities and longer-term sustainability of the project's activities. In the event that broad community support is not attained, the promoter is expected to dedicate all necessary resources and time to additional community engagement and public consultation initiatives, as is required.

Stakeholders' inputs will be documented and carefully considered throughout the project preparation and implementation phases.

Effective and meaningful engagement and consultation is a two way process to be guided by the following general principles:

- Be initiated by the promoter early in the process of identification of environmental and social risks and potential adverse impacts and continue throughout the project life cycle as risks and impacts arise;
- Be inclusive of the affected communities, and accessible to any vulnerable groups within, and differentiated by various segments;
- Be inclusive, beyond the affected parties, of any groups or individuals who have been identified as other interested parties; and,
- Be adequately documented both in substance and process.

Factors such as literacy, unequal gender relations and access to dissemination media constitute factors to be carefully considered by the promoter when pursuing an effective disclosure and information dissemination campaign.

#### **4.1.1.2 Procedural Requirements**

##### **A) Stakeholder Identification and Analysis**

The promoter will be comprehensive in identifying and prioritising all project stakeholders in the given context, especially those who may be differentially or disproportionately affected by the project because of their vulnerable status. Mapping the different types of stakeholders creates the basis for identifying the people who have human rights entitlements related to a project, as well as for identifying the entities accountable for these entitlements. It is also a valuable exercise for distinguishing between rights and interests in an operation and ensuring respect for the former, given they constitute a primary responsibility for public and private sector promoters alike.

Stakeholder analysis needs to clearly identify and differentiate between the different types of stakeholders, including consideration of their rights, roles, duties and responsibilities in the given context, outlining rights-holders and duty-bearers. Such analysis will help identify all impacted individuals and communities (right bearers) and the rights which they hold and may be threatened or interfered with in an operation. Government agencies, promoters and other parties (e.g. suppliers and contractors) as duty bearers, have the obligation and responsibility to ensure that these rights are upheld.

Particular attention will be placed upon the identification of vulnerable individuals and groups in the given project context and their meaningful engagement in consultation processes.

Drawing on independent experts and legitimate representatives can be particularly important in those contexts where rights-holders have limited capacity to represent their own views or may be restrained in doing so by contextual factors (e.g. post-conflict societal tensions, exclusion of certain groups from mainstream political life). In those cases, assessment of the representation of communities and groups is essential, particularly in terms of verifying whether the representatives engaged by the promoter faithfully and legitimately represent views of rights-holders concerned.

Stakeholder identification and analysis is a critical element in the stakeholder engagement process and the elaboration of relevant activities and measures that will take characteristics and interests of stakeholders into account. Failure to identify all relevant stakeholders can aggravate existing issues and subsequently jeopardise project objectives.

Many of the techniques and methodologies common to socio-economic assessments can aid in identifying stakeholders and determining how and to what extent a particular project may affect them.

## **B) Engagement Planning**

Stakeholder engagement should be built into an operation's planning in a way that enables a meaningful information exchange with all identified stakeholder groups at the very outset of the project and at subsequent key decision-making points in its life cycle. Adequate budgetary resources should be foreseen and dedicated to this activity.

In the case of projects with significant environmental and social risks and impacts, the promoter, at a minimum, will engage in a preliminary scoping process with identified affected individuals, communities and other relevant stakeholders to ensure the identification of all key issues to be investigated as part of the Environmental and Social Impact Assessment (ESIA) process.

The scoping process will facilitate the development of a Stakeholder Engagement Plan (SEP) for the project (refer to Annex 6 of Volume II- EIB Environmental and Social Practices and Procedures). As part of this process, stakeholders should be able to provide input to the draft Stakeholder Engagement Plan and any other scoping document, and receive feedback on how their comments and input have been incorporated and addressed.

The promoter will follow up with a second round of consultations when the draft final ESIA/ESMP reports are ready for consultation. Subsequently, the size and nature of the project, the number and nature of identified stakeholders as well as the provisions in the national legislation and relevant best practices will help determine the location, time, level and frequency of follow-up public consultations throughout the lifecycle of the project.

The promoter will be expected to build upon the avenues of communication and stakeholder engagement established during the ESIA process. This may include using the appropriate community engagement practices to disclose information and receive feedback on the effectiveness of the implementation of the mitigation measures defined in the ESMP, as well as the affected communities' ongoing interests and concerns about the project.

## **C) Information Disclosure**

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.

The promoter will provide the following information to all identified stakeholders who are likely to be affected by adverse environmental or social impacts from the project:

- the purpose nature, objectives and scale of the project;
- the duration of proposed project activities;
- any risks to and potential adverse impacts with regard to the environment, land tenure changes (resettlement, land acquisition or expropriation),

occupational and community health, safety and security, and any other potential adverse impact on communities arising from the project;

- the proposed mitigation plans and associated budget;
- the available grievance mechanisms;
- any added value and opportunities for benefit-sharing;
- the envisaged consultation process, if any, and opportunities and ways in which the public can participate; and,
- time and venue of any envisaged public meetings, and the process by which meetings are notified, summarised, and reported.

This information will be disclosed in the local language(s) and in a manner that is timely, accessible and culturally appropriate, taking into account any vulnerable or minority groups and their right to equitable representation and consideration for their rights, views and interests. The promoter will ensure that access to information is enabled to stakeholders early in the environmental and social impact assessment process and will continue as it unfolds.

#### **D) Public Consultation**

The consultation process is part of the public commitment of the promoter. Where communities are, or are likely to be, affected by adverse impacts from a project, the promoter will undertake a process of meaningful consultation in a manner that provides the affected parties with opportunities to identify and express their views on project risks, impacts, and mitigation measures, and engage in a collaborative process with the project in responding to, and addressing considerations raised. Initial stakeholder consultations will occur early enough for the rights and interests of impacted individuals and communities to influence decisions made throughout the project life cycle.

The promoter will consult all identified stakeholders at strategic decision-making points during the project lifecycle and certainly before any impact is delivered. The frequency and degree of subsequent engagement and consultations will depend on the nature and magnitude of risks and current and potential adverse environmental or social impacts arising from the project. At minimum, the promoter will ensure that a regular, consistent and reliable platform of on-going dialogue and communication with stakeholders is maintained.

Within the context of such dialogue, the promoter will consider, take into account and respond to all views expressed as appropriate and report to stakeholders on the rationale of ultimate decisions. Such rationale will need to demonstrate that impacts causing interference with people's human rights are in accordance with the law of the state in question, in pursuit of a legitimate public aim and proportionate to the objectives sought to be achieved by the project. Key in this process is the promoter's responsiveness and the meaningful on-going engagement and consultations with impacted individuals, communities and other relevant stakeholders.

The promoter will be required to review the effectiveness of previous public consultation processes, report on the findings and make the necessary amendments in the operation's environmental and social action plan (ESAP) and SEP to improve future consultations (see the section on monitoring and reporting below). The promoter will inform those who have participated in the public consultation process in a timely manner of the final decision on the project, the accompanying environmental and social mitigation measures and any associated benefits for the local communities. The promoter will further inform the latter of the reasons and

considerations on which the decision was based, as well as of the judicial and non-judicial grievance or complaint mechanism or process that should be available during the entire duration of the project.

### **E) Grievance Mechanism**

The promoter should be aware of and responsive to stakeholders' concerns related to the project in a timely manner. A grievance mechanism, process, or procedure at the project level constitutes a critical means for the early identification and remedy of undesirable or unforeseen impacts and other concerns arising out of the execution of the project. Its establishment promotes the affected persons' access to remedy and may facilitate resolution of such concerns and grievances linked to the promoter's environmental and social performance.

The promoter will ensure that a grievance mechanism is introduced at project level, irrespective of other complementary linkages or access to existing public grievance channels in the country concerned.

It should be designed as a mechanism that is:

- Legitimate and trusted;
- scaled to the risks and potential adverse impacts of the project;
- publicised and accessible, appropriately tailored to all potentially-affected persons and communities and other interested parties, irrespective of their literacy and administrative capacity;
- Free of cost for the stakeholders;
- includes the anonymity option, where feasible, and guarantee confidential handling of requests, if so requested by the complainant;
- Fair, transparent and inclusive;
- guided by engagement and dialogue;
- Predictable in terms of process;
- Timely;
- Not impeding access to grievance and resolution on grounds of one's financial ability to seek judicial remedy; and,
- A source of continuous learning for the promoter and the lending operation at large.

It is expected that such a mechanism is introduced by the promoter at the very outset of project design. In terms of scope, it should possess a life-span similar to that of the operation, whilst it should be open to serve all interested parties bearing concerns that arise out of the project's scope.

Where a complaint is not admissible or relevant, the promoter will refer the aggrieved parties to the relevant authority or other grievance process. The grievance mechanism, process or procedure should not impede access to independent judicial or administrative remedies outside any project specific context; quite the contrary, it should complement and facilitate access to independent bodies (e.g. Ombudsman).

Such mechanism, process, or procedure will document and address concerns communicated to the promoter promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all stakeholders, at no cost and without retribution. This is critical for it to be able to

deliver on its intended purpose, namely the strengthening of non-judicial access to grievance at the project level. For the grievance redress to function well, the mechanism should be adequately planned for, budgeted and staffed.

The promoter will introduce an effective feedback system to the mechanism, informing the affected communities about the project grievance process and its outcomes and reporting regularly to the public on its implementation, while protecting the privacy of individuals. The promoter will also inform the affected communities of their right to independent judicial recourse in the event that grievances cannot satisfactorily be resolved using the project-specific mechanisms. Resolution of a grievance should be confirmed by way of evidence of the satisfaction of the stakeholder/aggrieved party. It is required that the promoter diligently documents this process.

## **F) Monitoring and Reporting**

Engagement with stakeholders during the life of a project is a dynamic and 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 to and as an integral component of a project's Environmental and Social Management System, monitoring and reporting procedures must be established early on in the operation by the promoter.

In terms of monitoring, the promoter will arrange for all necessary provisions to assure stakeholder engagement during the monitoring phase. Thereby, the promoter will endeavour to 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.

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.

### **4.1.2 WB Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure**

This Environmental and Social Standard (ESS) recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

This ESS must be read in conjunction with ESS1 (Assessment and Management of Environmental and Social Risks and Impacts). Requirements regarding engagement

with workers are found in ESS2 (Labor and Working Conditions). Special provisions on emergency preparedness and response are covered in ESS2 and ESS4 (Community Health and Safety). In the case of projects involving involuntary resettlement or cultural heritage, the Borrower will also apply the special disclosure and consultation requirements set out in ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) and ESS8 (Cultural Heritage).

#### **4.1.2.1 Objectives**

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

#### **4.1.2.2 Scope of Application**

ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation, as outlined in ESS1.

For the purpose of this ESS, "**stakeholder**" refers to individuals or groups who:

- (a) Are affected or likely to be affected by the project (**project-affected parties**); and
- (b) May have an interest in the project (**other interested parties**).

#### **4.1.2.3 Requirements**

Borrowers will engage with stakeholders throughout the project life-cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will 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.

The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

The Borrower will maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

## **A. Engagement during Project Preparation**

### **i. Stakeholder Identification and Analysis**

The Borrower will identify the different stakeholders, both project-affected parties and other interested parties. Individuals or groups that are affected or likely to be affected by the project will be identified as 'project-affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'.

The Borrower will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable. Based on this identification, the Borrower will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.

### **ii. Stakeholder Engagement Plan**

In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.

The SEP will describe the timing and methods of engagement with stakeholders throughout the life-cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.

The SEP will be designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that

will be appropriate for different stakeholders. The SEP will set out how communication with stakeholders will be handled throughout project preparation and implementation.

The SEP will describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them.

When the stakeholder engagement with local individuals and communities depends substantially on community representatives, the Borrower will make reasonable efforts to verify that such persons do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner.

In certain circumstance, depending on the level of information available about the project, the SEP will take the format of a framework approach, outlining general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with this ESS that will be implemented once the location is known.

### **iii. Information Disclosure**

The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design:

- a) The purpose, nature and scale of the project;
- b) The duration of proposed project activities;
- c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these;
- d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
- e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
- f) The process and means by which grievances can be raised and will be addressed.

The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).

### **iv. Meaningful Consultation**

The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project

risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves.

Meaningful consultation is a two-way process, that:

- a) Begins early in the project planning process to gather initial views on the project proposal and inform project design;
- b) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- c) Continues on an ongoing basis, as risks and impacts arise;
- d) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
- e) Considers and responds to feedback;
- f) Supports active and inclusive engagement with project-affected parties;
- g) Is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- h) Is documented and disclosed by the Borrower.

## **B. Engagement during Project Implementation and External Reporting**

The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life-cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.

The Borrower will continue to conduct stakeholder engagement in accordance with the SEP, and will build upon the channels of communication and engagement already established with stakeholders. In particular, the Borrower will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures.

If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated.

## **C. Grievance Mechanism**

The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.

The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

- a) The grievance mechanism is expected to address concerns 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. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and
- b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.

#### **D. Organizational Capacity and Commitment**

The Borrower will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.

## **5.0 PROJECT STAKEHOLDERS**

For the purposes of this plan, a stakeholder is defined as any individual or group who is potentially affected by the proposed Project, or who has an interest in the proposed Project and its potential impacts. It is therefore important to establish which organisations, groups and individuals may be directly or indirectly affected (positively and negatively) by the proposed Project and which might have an interest in the proposed Project.

It should be noted that stakeholder identification is an on-going process, requiring regular review and updating as the ESIA progresses.

## **6.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS**

In order to develop an effective SEP it is necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the proposed Project. By classifying and analysing the stance, influence, capacity and interests of stakeholders it will be possible to develop a plan that is tailored to the needs of different stakeholder groups.

It is likely that a diverse range of stakeholders will be identified that could be involved in the SEP process. Different issues are likely to concern different stakeholders, and so different types of stakeholders will be grouped based on their connections to the proposed Project. Having an understanding of the connections of a stakeholder group to the proposed Project helps identify the key objectives of engagement.

As part of this, it is important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalised or vulnerable status. It is also important to understand how each stakeholder may be affected - or perceives they may be affected – so that engagement can be tailored to inform them and address their views and concerns in an appropriate manner.

Details of individual stakeholders will be compiled in a stakeholder register which will be periodically updated throughout the ESIA engagement process. Such information may be kept on a database for ease of use, but will not be shared with any third party. The stakeholder records are 'living documents' that can be updated as engagement progresses.

**Error! Reference source not found.**1 sets out the stakeholder groups that were identified following the inception phase. These stakeholder groups were expanded on during the scoping phase according to the individuals and groups who were consulted and / or who registered as stakeholders, also referred to as Interested and Affected Parties (I&APs).

**Table 1: Stakeholder Groups**

Stakeholder Categories	Stakeholder Groups	Connection to the proposed Project
Government	<ul style="list-style-type: none"> <li>National regulatory bodies</li> </ul>	<p>The Zambian Government is of primary importance in terms of establishing policy, granting permits or other approvals for the Project, and monitoring and enforcing compliance with Zambian law throughout all stages of the Project life-cycle.</p>
	<ul style="list-style-type: none"> <li>Provincial authorities</li> <li>Key local authorities (rural and urban district councils / municipalities/ District Commissioners/ Councillors)</li> </ul>	<p>Provincial, district and local authorities are impacted by the proposed Project and will be informed of progress and plans in their areas, to consider the proposed Project activities in their policy-making, regulatory and other duties and activities.</p>
Traditional Authorities	<ul style="list-style-type: none"> <li>Chiefs</li> <li>Village heads</li> </ul>	<p>Local community leaders and educational leaders, acting as representatives of their local community. Meetings with traditional authorities will follow local practices and be held prior to any wider communication in local communities in order to respect the cultural and social structures.</p>

Stakeholder Categories	Stakeholder Groups	Connection to the proposed Project
Communities	Project affected communities including: <ul style="list-style-type: none"> <li>• Registered and customary land owners</li> <li>• Residents and occupiers of land</li> <li>• People who use and/ or access land and resources</li> <li>•</li> </ul>	Households and communities that will be directly or indirectly affected by the proposed Project and its activities. This includes people living on land affected by the Project, either through direct land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected.
Vulnerable groups	<ul style="list-style-type: none"> <li>• Women headed households</li> <li>• Children headed households</li> <li>• Elderly, physically, mentally disabled</li> </ul>	Vulnerable groups may be affected by the proposed Project by virtue of their physical disability, social or economic standing, limited education, lack of access to land etc. They may also have difficulty in engaging with the stakeholder consultation process and thus may not be able to fully express their concerns regarding the proposed Project. Specific vulnerable groups will be identified during ESIA baseline data collection and strategies for effective engagement will be developed.
Civil Society	<ul style="list-style-type: none"> <li>• Cooperatives</li> <li>• Community Based Organisations (CBOs)</li> <li>• Associations</li> <li>• Cultural groups</li> </ul>	Organisations with direct interest in the proposed Project, and its social and environmental aspects and that are able to influence the Project directly or through public opinion. Such organisations may also have useful data and insight and may be able to become partners to the proposed Project in areas of common interest.



Stakeholder Categories	Stakeholder Groups	Connection to the proposed Project
Non-governmental Organisations (NGOs) / Institutions / Academic	<ul style="list-style-type: none"> <li>• National</li> <li>• Local</li> </ul>	<p>NGOs and academic institutions with direct interest in the Project, and its social and environmental aspects and that are able to influence the Project directly or through public opinion.</p>
Commerce and Industry	<ul style="list-style-type: none"> <li>• Local businesses, and entrepreneurs affected by potential social and / or environmental impacts</li> <li>• Firms who may benefit by providing goods and services to the Project</li> <li>• Potential suppliers and contractors</li> </ul>	<p>Individuals or organisations with direct economic interest in the Project. This may be through gaining contracts with the Project or due to economic impacts caused by the Project. They may also be potential business partners.</p> <p>As the Project develops and new contractors and service providers are identified, it is likely that these firms will become important stakeholders as they establish contractual relationships with the Project.</p>
Bilateral and Multilateral Organisations	<ul style="list-style-type: none"> <li>• Development Agencies</li> <li>• Financial Institutions</li> </ul>	<p>A range of different international organisations may have an interest in the Project and may have useful data or insight into local and national issues of relevance to the Project as well as international best practise.</p>

## 7.0 APPROACHES TO ESIA STAKEHOLDER ENGAGEMENT

This section tables an approach to engagement which has been designed to comply with the national legislation and international standards described above. .

The stakeholder engagement process will involve five key stages as shown in **Error! eference source not found.1**, and include:

- Inception Phase;
  - Notification and Scoping; and
  - ESIA Disclosure.
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Figure 1: Stakeholder Engagement Stages

The stages of stakeholder engagement are described in more detail below in **Error! eference source not found.2** that includes a summary of the objectives and activities for each stage.

All stakeholder engagement activities will be informed by, and regularly updated according to an iterative process of stakeholder identification, analysis and mapping and on the basis of comments received on the stakeholder engagement process. The final SEP will then be carried forward into Project execution, i.e construction and operation.

**Table 2: Stages of Engagement**

Stage	Objective	Key Activities	Key Outputs
Inception Engagement	<ul style="list-style-type: none"> <li>To gain a preliminary understanding of the scope of the Project, appropriate and legislated engagement requirements and relevant stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>Field visit; and</li> <li>Stakeholder identification process.</li> </ul>	<ul style="list-style-type: none"> <li>SEP for the ESIA;</li> <li>Potential list of stakeholder groups;</li> </ul>
Scoping Engagement	<ul style="list-style-type: none"> <li>To meet key stakeholders and introduce them to the Project and ESIA Process;</li> <li>To disclose the Project in the public domain to all interested and affected stakeholders;</li> <li>To gather issues of concern and through this identify a list of potential impacts;</li> <li>To consult key stakeholders on the next steps in the ESIA process;</li> <li>To generate feedback on the Draft Scoping Report, including the scope, approach and key issues to be investigated further for the ESIA.</li> </ul>	<ul style="list-style-type: none"> <li>Meetings with key stakeholders to facilitate the broader stakeholder engagement process</li> <li>Dissemination of engagement materials (background information document, posters, media notices etc.)</li> <li>Consultation on the proposed Project and associated ESIA through meetings and workshops with identified stakeholders. Details may include:               <ul style="list-style-type: none"> <li>Nature, purpose and scale of the proposed project</li> <li>ESIA &amp; stakeholder engagement process</li> </ul> </li> <li>Confirmation of issue identification and feedback from stakeholders;</li> <li>Formal submission of Scoping Report to ZEMA;</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder database;</li> <li>Engagement tools and proof of their dissemination;</li> <li>Meeting minutes/issues and response report;</li> <li>Updated SEP;</li> <li>Feedback material for the Draft Scoping Report.</li> </ul>
ESIA Disclosure	<ul style="list-style-type: none"> <li>To discuss the identified impacts and proposed mitigation measures with stakeholders allowing for their input; and</li> <li>To provide stakeholders with the</li> </ul>	<ul style="list-style-type: none"> <li>Submission of the draft ESIA Report to ZEMA and dissemination to other key authorities and stakeholders. ZEMA will be responsible for the distribution of copies of the ESIA</li> </ul>	<ul style="list-style-type: none"> <li>Draft ESIA Report;</li> <li>Notification material;</li> <li>Meeting minutes and/or issues and response report;</li> </ul>

Stage	Objective	Key Activities	Key Outputs
	<p>opportunity to comment on the Draft ESIA report.</p>	<p>report to relevant ministries, local government units, parastatals, nongovernmental and community-based organisations, interested and affected parties. They also need to place copies of the ESIA report in public buildings in the vicinity of the site of the proposed project. Availability of the draft ESIA Report will be advertised through print and electronic media for public review. Comments can be received 20 days from the date of the last media notice. ZEMA may extend this period by a further 15 days</p> <ul style="list-style-type: none"> <li>• Dissemination of engagement materials disclosing findings of the draft Impact Assessment Report;</li> <li>• Consultation on the draft Impact Assessment Report. This will include: <ul style="list-style-type: none"> <li>○ Identification of impacts in the draft ESIA and proposed mitigation;</li> <li>○ Identification of stakeholder concerns and opinions on the impacts identified;</li> <li>○ Involvement of stakeholders in assessing the efficacy and appropriateness of the</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Updated SEP.</li> </ul>

Stage	Objective	Key Activities	Key Outputs
		<ul style="list-style-type: none"> <li>○ proposed mitigation measures; and</li> <li>○ Identification of revisions or additions to the draft ESIA report where necessary.</li> </ul>	
Formal Submission of Final ESIA	<ul style="list-style-type: none"> <li>• Submission of final ESIA to ZEMA with comments incorporated from the ESIA engagement and disclosure stage</li> </ul>	<ul style="list-style-type: none"> <li>• Submission of the Final ESIA to the ZEMA for approval.</li> </ul>	<ul style="list-style-type: none"> <li>• Approval of the ESIA Report; and</li> <li>• Final SEP.</li> </ul>

## 8.0 COMMUNICATION METHODS

A variety of communication methods will be used during the stakeholder engagement process. This will be determined by the level and objective of engagement, as well as the target stakeholder group.

English is the official language of Zambia; however the major languages spoken by the communities affected by the Project are Bemba, Soli and Nyanja. Oral communication will be undertaken in the local languages in the communities but English will be used for high level stakeholder meetings.

**Error! Reference source not found.**3 outlines the various communication hannels that will be utilised during the ESIA stakeholder engagement process, with the relevant target audience also identified. Approaches to engagement and communication channels used will also be verified and updated where necessary during the stakeholder engagement process.

All engagement materials will be produced in English including at the local level and translated into local languages. , The primary focus of engagement will be on verbal communication via public meetings and other socio-economic engagement tools using the local languages noted above.

During face-to-face meetings, particularly with customary authorities and communities, local facilitators will be used. The use of facilitators will be according to cultural norms and local languages and will include both men and women facilitators that speak the required languages of the communities

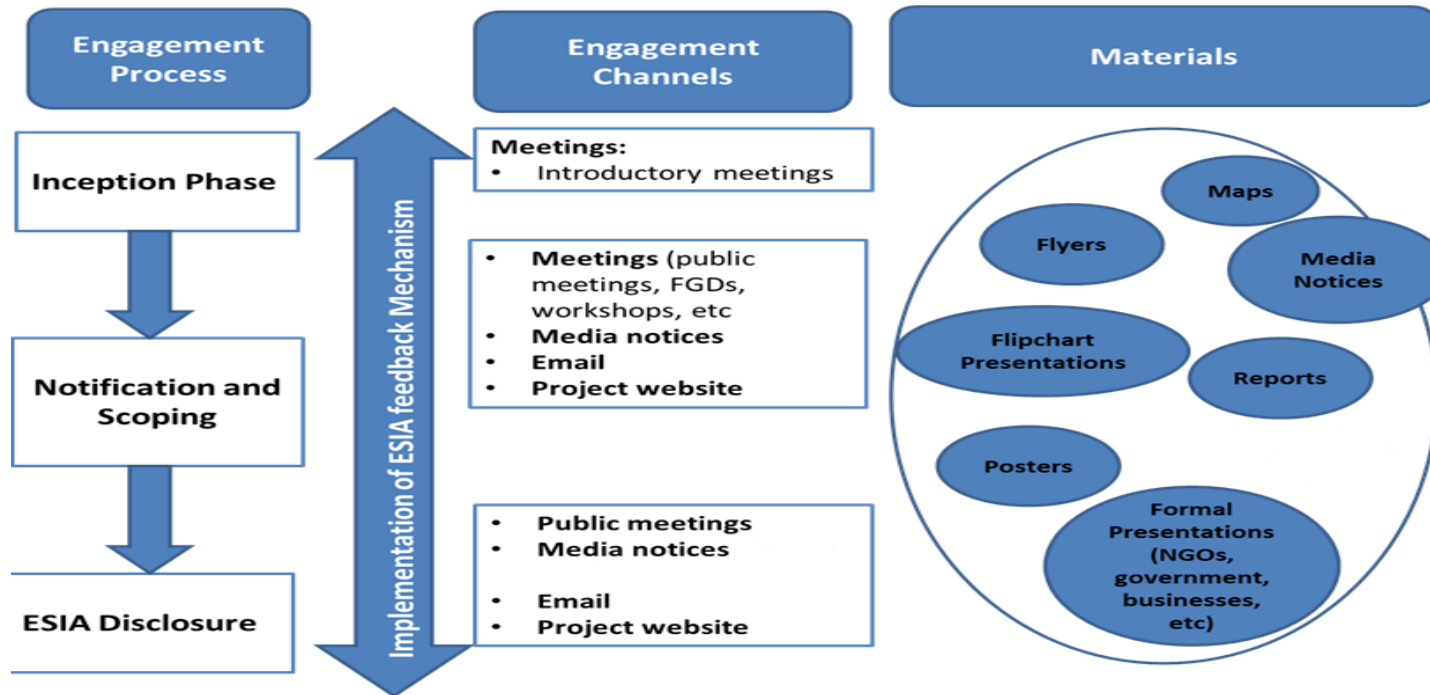
**Table 3: Communication Channels**

Communication Channel	Objective	Target Stakeholders
ZESCO website	<ul style="list-style-type: none"> <li>• Webpage on ZESCO’s website designed to inform all affected and interested stakeholders who have access to the internet.</li> <li>• The webpage provides links to available documents including the Draft Scoping and ESIA Reports and materials.</li> <li>• .</li> </ul>	<ul style="list-style-type: none"> <li>• Government institutions.</li> <li>• Non-Governmental Organisations (NGOs)</li> <li>• Media</li> <li>• Academics and research institutes</li> <li>• Commerce and industry</li> <li>• Bilateral and multilateral organisations</li> </ul>
Media (newspaper) Posters	<ul style="list-style-type: none"> <li>• Used to make announcements regarding the Project and ESIA process;</li> <li>•</li> <li>• Inform stakeholders of meetings or the availability of project information.</li> </ul>	<ul style="list-style-type: none"> <li>• National and state stakeholders</li> <li>• Traditional leaders</li> <li>• Communities</li> <li>• Community Based Organisations (CBOs)</li> <li>• Associations</li> <li>• Cultural groups</li> </ul>
Email	<ul style="list-style-type: none"> <li>• To distribute all project notification material to those parties with access to this facility;</li> <li>• To inform stakeholders of availability of project information including tabling of ESIA reports (Scoping report, draft ESIA report etc.).</li> </ul>	<ul style="list-style-type: none"> <li>• National, provincial, district and local government</li> <li>• NGOs</li> <li>• Academics and research institutes</li> <li>• Commerce and industry</li> <li>• Bilateral and multilateral organisations</li> </ul>

Communication Channel	Objective	Target Stakeholders
Face to face meetings: <ul style="list-style-type: none"> <li>• Workshops</li> <li>• Formal meetings</li> <li>• Community meetings</li> <li>• Focus Group Discussions</li> </ul>	<ul style="list-style-type: none"> <li>• To transmit information about the Project and ESIA process and reinforce two-way dialogue.</li> </ul>	All stakeholder groups to be targeted through one of these engagement needs.



A variety of materials will be used during stakeholder engagement, in particular during face-to-face engagement. Figure **2: Stakeholder Engagement Materials 2** outlines the stakeholder engagement tools that will be used throughout the various stages of the ESIA process.



**Figure 2: Stakeholder Engagement Materials**

## **9.0 CONSIDERATIONS FOR THE ENGAGEMENT PROCESS**

Focused efforts will be made to engage with directly impacted stakeholders, including vulnerable groups at the local level. Affected individuals will be consulted directly and via their representatives, and other influential people within communities.

In addition special efforts will be made to meet with representatives of potentially vulnerable groups who may not be reached through established structures.

Identification of vulnerable groups shall be confirmed during the Scoping and Baseline Data Collection stages and subsequent data analysis.

All meetings will follow local practices and norms. Meetings with the local administration and with traditional leaders will be held prior to any wider communication in the villages in order to respect traditional structures.

All affected communities and groups will be made aware of the Project feedback and grievance mechanism.

## **10.0 THE STAKEHOLDER ENGAGEMENT PROGRAMME**

### **10.1 SCOPING ENGAGEMENT**

#### **10.1.1 Objectives of Scoping Engagement**

Formal Scoping engagement aims to integrate stakeholder issues within the ESIA process from an early stage. It enables stakeholders to raise issues of concern and make suggestions for enhancing benefits from the Project. It also provides stakeholders with an opportunity to evaluate alternatives and to contribute relevant local knowledge to the process. Scoping engagement provides an opportunity to refine the on-going stakeholder mapping and analysis process.

In addition to undertaking desk based stakeholder mapping, analysis and planning, the scoping engagement shall endeavour to:

- Engage with key stakeholders so as to introduce the project, the ESIA process and obtain clarification with regard to community engagement;
- Notify stakeholders of the Project and the ESIA process;
- Identify stakeholder issues of concern;
- Formally initiate the engagement process and introduce the ESIA team; and
- Provide stakeholders with an opportunity to ask questions and give input on the Project.

Engagement methods should be tested during the Scoping Phase and provide input in the improvement of future engagements.

#### **10.1.2 Stakeholder Engagement for the Scoping Phase**

Prior to the commencement of stakeholder engagement activities, meetings should be scheduled with relevant traditional authorities, Civic Leaders, Community Representatives, Political leaders, Heads of Government departments, Members of Parliament in the project area, representatives from NGOs and CSOs, the Media and other Interested and Affected Parties (I&APs). The purpose of these meetings shall be to refine the stakeholder engagement strategy so as to meet the requirements of I&APs and ensure that future communication is effective and cognisant to social and cultural sensitivities.

#### **10.1.3 Preparation and Distribution of Notification Material**

The formal Scoping engagement stage may involve various preparatory activities, to include but not limited to the following:

- Review of existing stakeholder mapping and analysis
- Preparation and review of the Scoping stakeholder engagement programme
- Planning and confirmation of logistics
- Development of stakeholder engagement tools
- Publication of media announcements

A stakeholder database should be compiled and updated following the scoping meeting as per comments and submissions received.

Stakeholder engagement tools may include the following:

- A Background Information Document (BID);
- Media announcements;
- Letters of invitation;
- Brochures;

Advertisements may be placed in newspapers in English and accompanied by the ZESCO's logo to facilitate legitimacy. The notices may be placed in the local newspapers and further broadcast on television.

In addition, ZESCO through its website (<http://www.zesco.co.zm>) shall disseminate project information, and collect input from stakeholders. The project information on this website will be maintained throughout the ESIA process.

#### **10.1.4 Engagement Activities**

Scoping phase engagement shall involve engagement of stakeholders at the provincial, district and local level. Differentiated approaches to engagement shall be utilised and will continue depending upon the degree to which groups are likely to be impacted, as well as type and level of interest in the Project.

Meetings may be scheduled as follows:

- Meetings with regulators and government officials at the national, provincial, district and local level.

- Public meetings shall be held in the Project area. These meetings will be advertised in the media announcements and all I&APs will be invited to attend, including members of the public and Key Interest Groups such as NGOs, CBOs, Business and Industry. In addition, letters of invitation will be written to a select group of stakeholders.

- Meetings with affected communities in the right of way shall take place and will continue to take place to engage them in the resettlement programme.

Comments raised by I&APs shall be recorded and shall continue to influence the ESIA process.

Interested and Affected Parties (I&APs) who will be unable to attend the meetings will be accorded an opportunity to submit their comments in writing on a Comments and Response Form to a member of the Project team, either in person, via email or by post.

## **11.0 FEEDBACK MECHANISM**

Stakeholder engagement is a two way process. It is therefore important to ensure that there is a feedback mechanism where stakeholders affected by or interested in the Project can present their input (e.g. opinions, requests, suggestions and grievances) for consideration and, if required, seek redress. It should be noted that, even where not all feedback or grievances are deemed 'valid' or applicable to the context of the Project, the feedback mechanism needs to function in a non-judgemental manner and record all feedback received.

In the case of this Project, there is a need for both a grievance and feedback mechanism. The grievance mechanism is the responsibility of the Project developer, and should be designed to identify and manage issues across the entire project lifecycle.

## **12.0 MONITORING AND REPORTING**

### **12.1 MONITORING STAKEHOLDER ENGAGEMENT ACTIVITIES**

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and in particular that stakeholders have been meaningfully consulted throughout the process.

There are two key ways in which the stakeholder engagement process will be monitored:

#### **Review of Engagement Activities in the Field:**

During engagement with stakeholders the ESIA team will assess meetings using a feedback evaluation form or asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly.

Conduct debriefing sessions with the engagement team while in the field. This assesses whether the required outcomes of the stakeholder engagement process are being achieved, and provide the opportunity to amend the process where necessary.

The use of engagement tools developed through the ESIA engagement including:

1. Stakeholder database;
2. Issues Log or Issues and Response table; and
3. Meeting records of all consultations held.

Moreover the tool can be used to manage on-going Project issues, and for stakeholder identification and analysis processes.

#### **Reporting Stakeholder Engagement Activities**

Performance will be reviewed following the engagement sessions conducted in the field. In addition there will be opportunity for the ESIA engagement team to review and assess performance in between the engagement sessions depending on the level of feedback received from stakeholders during these periods.

Evaluation of performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance the following will be considered:

1. Materials disseminated: types, frequency, and location;
2. Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. women, youth, community leaders);
3. Number of comments received on specific issues, type of stakeholder and details of feedback provided;
4. Numbers and type of stakeholders who come into contact with the Project team by mail, telephone and any other means of communication;
5. Meeting minutes, attendance registers and photographic evidence;

6. Comments received by government authorities, community leaders and other parties and passed to the Project;
7. Numbers and types of feedback and / or grievances and the nature and timing of their resolution; and
8. The extent to which feedback and comments have been addressed and have led to corrective actions being implemented.



