MINISTRY OF
ENERGY AND MINERAL DEVELOPMENT

THE UGANDA BIOGAS AND ELECTRIC COOKING PROGRAMME (UBEP)

STAKEHOLDER ENGANGEMENT PLAN (SEP)

November 2024

TABLE OF CONTENTS

TABLE OF CONTENTS ..... *ii*

LIST OF FIGURES ..... *iv*

LIST OF TABLES ..... *iv*

ACRONYMS ..... *v*

EXECUTIVE SUMMARY ..... *vi*

1. INTRODUCTION *1*

1.1 Purpose of the SEP **1**

1.2 SEP as an operational tool **1**

1.3 Overall Objective of the SEP **2**

1.3.1 Objectives of SEP 2

1.3.2 Specific objectives of the SEP 2

1.4 Guiding Principles of the SEP **3**

1.5 Scope of this document **3**

1.5.1 Project beneficiaries' Scope 3

1.5.2 Technical scope 4

1.5.3 Temporal scope 4

1.5.4 Geographical scope 4

2. PROJECT DESCRIPTION *5*

2.1 UBEP Project Objective **5**

2.2 Project Scope **5**

2.3 Project Benefits **5**

2.4 Environmental and Social Risks of the Project **5**

2.5 Mitigation Strategies **6**

3. REGULATORY AND GOVERNANCE FRAMEWORK *7*

3.1. National regulatory framework relevant to implementation of SEP are listed below. **7**

3.2. AfDB Operational Safeguards relevant to UBEP project **7**

4. STAKEHOLDERS ENGAGEMENT PLAN (SEP) FOR UBEP *15*

4.1 Stakeholder identification and analysis for UBEP Project **15**

4.1.1 Affected Parties 15

4.2 The approach used to identity stakeholders in relation to the criteria involved **16**

4.2.1 Disadvantaged / vulnerable individuals or groups 16

5. STAKEHOLDER'S ENGAGEMENT METHODOLOGY *18*

5.1 Engagement process **18**

5.2 Stakeholder Mapping and Identification **18**

5.3 Proposed Strategy for Information Disclosure 19
5.4 Stakeholder Identification and Analysis 24
6. STAKEHOLDER ENGAGEMENT ACTIVITIES 29
7. GRIEVANCE REDRESS MECHANISM 37
7.1 Grievance Redress committees by Component 37
7.2 Grievance Process 38
8. INSTITUTIONAL ARRANGEMENT FOR SEP IMPLEMENTATION 43
8.1 Introduction 43
8.2 Project Steering Committee (PSC): 43
9. MONITORING AND REPORTING 45
9.1. Introduction 45
9.2. Reporting 47
9.3. Reporting 48
10. SEP IMPLEMENTATION BUDGET 50
ANNEXES 51
Annex 1: Template for stakeholder registry 51
Annex 2: List of PAPs and key stakeholders consulted 52

LIST OF FIGURES

Figure 1: List of regulatory frameworks under the SEP *7*
Figure 2: Influence vs. Interest of stakeholders in the engagement process *18*
Figure 3: Stakeholder effort and extent of influence *19*
Figure 4: The Process Flow Chart of Grievance Redress Mechanism *41*

LIST OF TABLES

Table 1: Operational guidelines and their relevance to the project *8*
Table 2: Summary of Stakeholder Engagement Arrangements *20*
Table 3: Stakeholder Engagement Activities *21*
Table 4: Stakeholders Mapping and Analysis *22*
Table 5: Summary of the key stakeholder concerns/comments/views *24*
Table 6: Stakeholder Analysis Matrix *24*
Table 7: Stakeholder's levels of consultation and process *25*
Table 8: Stakeholder Engagement Activities *30*
Table 9: Stakeholder Engagement Communication Plan *36*
Table 10: Communication Channels for stakeholder engagement *36*
Table 11: Grievance Redress Mechanism *37*
Table 12: MEMD KPIs *46*
Table 13: Contractor KPIs *47*
Table 14: Reporting Template *48*
Table 15: Associated Stakeholder Engagement Risks *48*
Table 16: Budget required for implementation of SEP *50*

ACRONYMS

AfDB: African Development Bank

CSO: Civil Society Organization

ESIA: Environmental and Social Impact Assessment

ESMP: Environmental and Social Management Plan

GoU: Government of Uganda

GRC: Grievance Redress Committee

GRM: Grievance Redress Mechanism

IUCN: International Union for Conservation of Nature

MAAIF: Ministry of Agriculture and Animal Industry and Fisheries

MEMD: Ministry of Energy and Mineral Development

MFPED: Ministry of Finance, Planning and Economic Development

MoE: Ministry of Environment

MoLG: Ministry of Local Government

NEMA: National Environment Management Authority

NGO: Non-Governmental Organization

OS: Operational Safeguard

PAPs: Project Affected People

PIU: Project Implementation Unit

RAP: Resettlement Action Plan

RoW: Right-of-Way

SEP: Stakeholder Engagement Plan

UBEP: Uganda Biogas and Electric-Cooking Programme

EXECUTIVE SUMMARY

The Stakeholder Engagement Plan (SEP) for the Uganda Biogas and Electric Cooking Program (UBEP) outlines a comprehensive framework for engaging stakeholders in a transparent, inclusive, and culturally appropriate manner throughout the project lifecycle. It is designed to ensure timely and effective communication with project-affected people (PAPs), address grievances, and integrate stakeholder input into decision-making processes. The SEP's primary objective is to foster dialogue, build trust, and mitigate risks while ensuring the participation of marginalized and vulnerable groups. As a living document, the SEP will be regularly updated to reflect stakeholder needs and project dynamics.

The UBEP aims to enhance access to clean and efficient cooking technologies, improve public health, empower women, and promote environmental sustainability. It focuses on the development of public biogas plants, deployment of electric cooking appliances, and capacity building for long-term sectoral growth. The program delivers multiple benefits, including reduced indoor air pollution, economic savings, and gender equality. However, potential risks such as odor from biogas plants, safety hazards during construction, and disruptions to local customs are addressed through mitigation measures like Environmental and Social Impact Assessments (ESIAs), community consultations, and strict adherence to safety and environmental standards.

The project adheres to Uganda's national regulations and the African Development Bank's (AfDB) Operational Safeguards, ensuring compliance with guidelines on environmental and social assessment, labor conditions, resource efficiency, and stakeholder engagement. A critical component of the SEP is the identification and categorization of stakeholders, which includes government agencies, private sector actors, local communities, and vulnerable groups such as women-headed households and persons with disabilities. Tailored engagement strategies, including focus groups, translated materials, and accessible venues, are designed to ensure that all stakeholders, particularly the most vulnerable, are informed and actively involved in the project.

Stakeholder engagement activities evolve across the project phases, starting with initial consultations and continuing through scoping discussions, impact assessments, resettlement planning, and periodic updates. These activities ensure transparency and accountability while addressing stakeholder concerns. The Grievance Redress Mechanism (GRM) provides a structured framework for addressing complaints equitably and transparently. It includes multiple channels for grievance submission, localized resolution processes, and documentation of outcomes. A separate mechanism addresses worker grievances, emphasizing workplace safety and compliance.

The SEP's implementation is overseen by the Ministry of Energy and Mineral Development (MEMD) through its Renewable Energy Department and a dedicated Project Implementation Unit (PIU), with strategic oversight provided by a Project Steering Committee (PSC). Monitoring and reporting are integral to the SEP's success, with key performance indicators (KPIs) used to assess engagement effectiveness, grievance resolution, and stakeholder satisfaction. Regular reports are shared with the African Development Bank and local communities, ensuring transparency and fostering accountability.

The SEP is supported by a detailed budget that covers stakeholder consultations, communication materials, grievance redress training, and community outreach. Allocations specifically address the needs of vulnerable groups to ensure equitable participation. Through its structured methodologies, robust governance, and adequate resources, the SEP is a cornerstone of the UBEP, fostering stakeholder trust, mitigating risks, and ensuring the program's success.

1. INTRODUCTION

1.1 Purpose of the SEP

Stakeholder Engagement Planning aims to ensure that adequate and timely information is provided to project-affected people, that proper mechanisms for information, consultation, and involvement is established, that this process will enable opportunities for dialogue, two-way discussion and active public participation. It can be expected that good implementation of stakeholder engagement will contribute to positive acceptance of the project activities and avoid as much as possible annoyance/dissatisfaction of the affected people that could be caused by the project activities. The envisaged nature and scale and nature of project risks is moderate, and the SEP shall be commensurate to these impacts. Indeed, the involvement of the local and national stakeholders will be an essential component of the project, to ensure smooth collaboration between project staff and communities and minimize and mitigate environmental and social risks related to the project

This document is prepared to be a base for consistent, comprehensive, coordinated and culturally appropriate approach to stakeholder engagement throughout the different phases of the Project. The SEP is a living document, and it will be regularly monitored, reviewed and updated by MEMD throughout all stages of Project implementation.

1.2 SEP as an operational tool

This SEP will be an operational tool to define the protocols for effectively engaging the project stakeholders including local and affected communities in the overall project development, disseminate activities, outputs and results, coordinate and hold consultations and develop clear channels of the project communication to all relevant stakeholders and target audiences. The SEP will also describe the Grievance Redress Mechanisms that will be available for PAPs and project affected communities to seek redress and opinions project implementation team. This SEP is a formal strategy to provide equal opportunities for engagement and participation to the affected, interested, concerned stakeholders and to define effective communication strategies with the different project stakeholders.

In terms of communication, the SEP specifies the frequency and type of communications tools such as media, contact persons, telephone, meetings etc. and locations of communication events. It is prepared at the beginning of the project and updated frequently, as stakeholders' communication might require change. The SEP identifies actions required to promote effective involvement of stakeholders in decision-making and execution. It can be formal or informal and highly detailed or broadly framed, based on the needs of the project and the expectations of its stakeholders. SEP describes the timing and methods of

engaging with stakeholders and range of information to be communicated to them as well as information to be sought from them throughout the life cycle of the project, distinguishing between PAPs and other interested parties.

1.3 Overall Objective of the SEP

The SEP's objective is to provide stakeholders with timely, relevant, understandable and accessible information; consult with them in a culturally appropriate manner that shall be free of manipulation, interference, coercion, discrimination and intimidation. It also considers the main characteristics and interests of stakeholders, different level of engagement and consultation that will be appropriate for different stakeholders throughout preparation and implementation.

1.3.1 Objectives of SEP

The overall goal of this SEP in line with the AfDB ISS 10 is 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 and also to improve and facilitate decision making and create an atmosphere of understanding that actively involves project – affected people (PAPs) and other project stakeholders. All in a timely manner to ensure that these groups are provided with sufficient opportunity to voice their opinions and concerns that may influence project decision. It is essential for ensuring that the interests and concerns of all relevant parties are addressed in a technically and culturally appropriate manner.

1.3.2 Specific objectives of the SEP

The specific objectives of this Stakeholder Engagement Plan (SEP) are:

a) To establish a systematic approach to stakeholder engagement that will help implementing agencies identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties.
b) To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.
c) To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project's life cycle on issues that could potentially affect them.

d) 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.
e) To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow implementing agencies to respond to and manage such grievances.
f) To devise means and ways to reduce potential negative impacts.
g) To assess the groups that should be encouraged to participate in the different stages of the project.
h) Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice

1.4 Guiding Principles of the SEP

Guiding principles for Stakeholder engagement include:

- **Inclusivity**: Ensure all relevant stakeholders are identified and included in the engagement process.
- **Transparency**: Maintain open and honest communication, providing stakeholders with clear and accurate information.
- **Appropriateness**: Use engagement methods that are suitable for the stakeholders' needs and the project's context.
- **Clarity**: Clearly define the purpose, scope, and expected outcomes of the engagement activities.
- **Comprehensiveness**: Cover all aspects of the project that may impact or interest stakeholders.
- **Respect and Sensitivity**: Acknowledge and respect the diverse perspectives and needs of stakeholders.
- **Continuous Improvement**: Regularly review and improve engagement strategies based on feedback and changing circumstances.

1.5 Scope of this document

1.5.1 Project beneficiaries' Scope

SEP is applicable to various project beneficiaries including:

i. Government - Central and Local (different levels)
ii. Private Sector – service providers, financial institutions, private sector associations, etc.
iii. Targeted consumers and the general public.
iv. Social cultural institutions
v. Other development partners including members of the Sustainable Energy Programme Donor Group

vi. Communities of practice – researchers, academia, etc.

1.5.2 Technical scope

This plan defines a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. It outlines the ways in which the Project will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about UBEP and any activities related to the project.

1.5.3 Temporal scope

The plan covers all project phases – programme planning, design and development; technical works (biogas construction works & electric cooking component delivery); monitoring and evaluation; commissioning; as well as operations and maintenance.

1.5.4 Geographical scope

The plan will have a national approach, while keeping critical focus to the project areas, namely, i) the 47 biogas location sites; ii) electric cooking focus cities; and iii) bio-slurry study area.

2. PROJECT DESCRIPTION

2.1 UBEP Project Objective

First, the project aims to extend access to clean and efficient cooking technologies, particularly for underserved communities. To this end, the project seeks to alleviate the financial burden on households by replacing costly traditional biomass stoves with clean and relatively affordable alternatives. Lastly, the project will seek to promote gender equality by reducing the time and effort spent on traditional cooking methods enabling women to engage in other activities.

2.2 Project Scope

The program is structured into three main components aligned with the MEMD's objectives of promoting biogas and eCooking adoption; enhancing awareness and driving behavioral change in cooking practices; and strengthening the MEMD's capacity to implement large-scale biogas and electric cooking projects for long-term sustainability of the sector. Specifically, the three components focus on: i) Development of public biogas plants; ii) Deployment of electric cooking appliances; iii) Program management.

2.3 Project Benefits

- Increased access to clean energy for cooking
- Improved health, especially for women and children, is a key outcome, due to reduced indoor air pollution.
- Biogas plants and electric cooking supports environmental sustainability by easing pressure on natural resources and curbing deforestation.
- Economic gains emerge as households save on fuel expenses, leading to increased disposable income.
- Gender equality is promoted as women gain time and opportunities for education, income, and social engagement.

2.4 Environmental and Social Risks of the Project

The UBEP project is likely to have the following environmental and social risks:

- Odor and Air Quality - Biogas plants, particularly those dealing with organic waste, can produce unpleasant odor if poorly constructed, which can negatively affect the local environment. Quality assurance during implementation while ensuring proper handling of organic waste to limit emissions.
- Health and Safety Risks – transportation of materials and construction works can pose different HSE risks. Ensuring rigorous safety protocols, including regular monitoring, safety training for workers will form strong part of the project.
- Biogas feedstock availability – the project will establish waste management practices and collaborate with project local focal person teams, proponents and communities to ensure a steady supply of feedstock.
- Cultural and Community Impacts - Biogas outputs might alter local customs or community

dynamics, especially in areas with established agricultural practices or traditional waste management systems. Community consultations, ensuring that local cultural norms and potential traditional/institutional practices are integrated.

2.5 Mitigation Strategies

Generally, a number of appropriate mitigation measures will be deployed to manage risk:

- Environmental and Social Impact Assessments (ESIA): Develop thorough ESIAs to identify and mitigate potential environmental and social impacts.
- Develop site specific ESMPs to monitor and supervise environmental and social safeguards at project level
- Community Engagement: Meaningfully involve local communities in planning and decision- making to address their concerns and minimize social impacts.
- Best Practices in Construction: Implement best practices and in accordance with national regulations and technology specific standards to reduce accidents
- Monitoring and Compliance: Regularly monitor environmental and social impacts and ensure compliance with regulations and standards.

3. REGULATORY AND GOVERNANCE FRAMEWORK

The AfDB requires full compliance to national and as applicable, regional/local laws and legislation of the country where the project operates. A number of relevant laws and legislation of the Republic of Uganda have been put in place as stakeholder engagement safeguards. MEMD shall conform in all respects, with the provisions of the national laws, ordinance, and other law, or any regulation, other duly constituted authority in relation to the execution and completion of the UBEP.

3.1. National regulatory framework relevant to implementation of SEP are listed below.

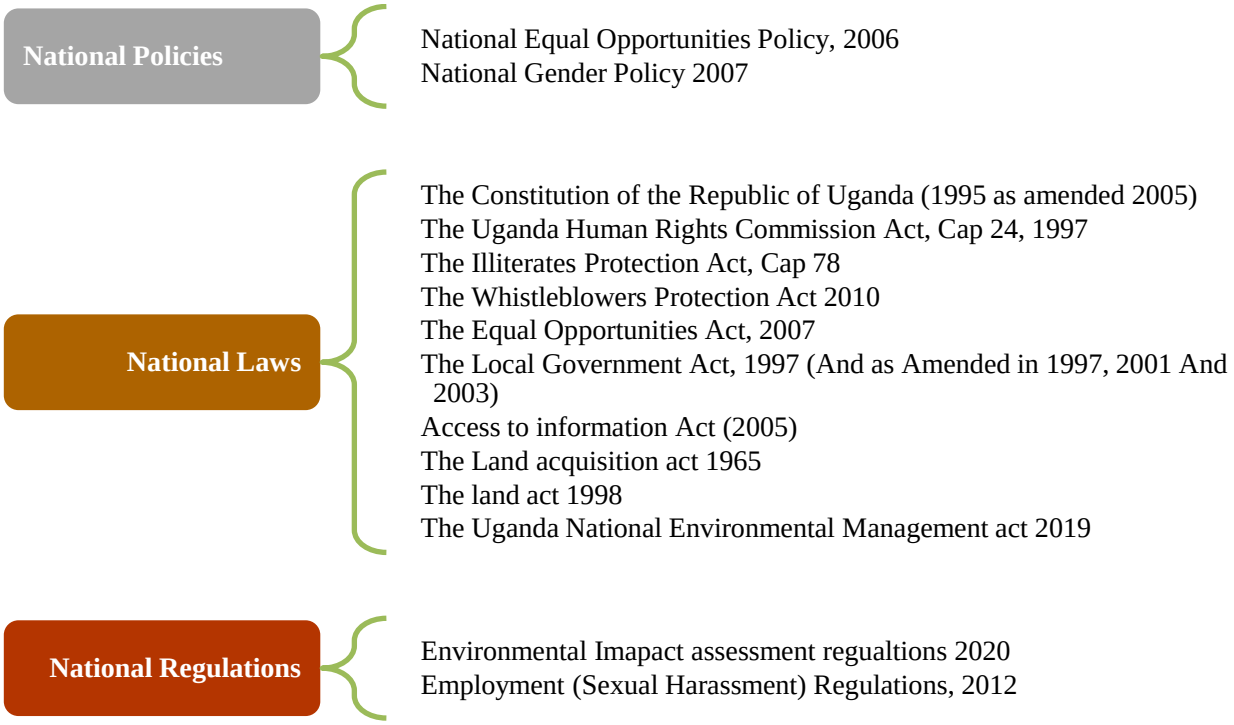


Figure 1: List of regulatory frameworks under the SEP

3.2. AfDB Operational Safeguards relevant to UBEP project

Since the UBEP project is funded by African Development Bank (AfDB), it must comply with the Bank's Operational Safeguards when addressing Environmental and Social risks. These policies are designed to promote the sustainability of project outcomes by protecting the environment and people from the potentially adverse impacts of projects.

Table 1: Operational guidelines and their relevance to the project

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
Operational Safeguard (OS1): Environmental and social assessment.	This overarching safeguard governs the process of determining a project's environmental and social category and the resulting Environmental and Social Assessment requirements.	The sites shall be subjected to the requirements of OSs with the preparation of an ESIA report following both the requirements of the country and the Bank
Operational Safeguard (OS 2): Labour and working conditions	• To protect workers' rights. • To promote safety and health in the workplace. • To promote the fair treatment, non-discrimination, and equal opportunity of project workers. • To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this OS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate. • To prevent the use of all forms of forced labour and child labour.	The program will ensure that workers' rights are respected in line with the Ugandan legal framework as well the OS for the AfDB
Operational Safeguard (OS 3): Resources Efficiency and Pollution Prevention and Management	• To promote the sustainable use of resources, including energy, water, and raw materials. • To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.	The program will use best industrial practices on waste management in line with legal framework of Uganda

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	• To avoid or minimize project-related emissions of short and long-lived climate pollutants. • To avoid or minimize generation of hazardous and non-hazardous waste. • To minimize and manage the risks and impacts associated with pesticide use.	
Operational Safeguard (OS 4): Community Health, Safety and Security	• To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project or operation lifecycle from both routine and non-routine circumstances. • To help promote public health and safety across the project' area of influence by, inter alia, promoting and supporting programmes that prevent the spread of major communicable diseases. • To promote quality and safety, and considerations relating to climate change in the design and construction of infrastructure, including dams. • To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials.	The program will ensure that the communities where activities are done are protected in line with the OSH Act 2006 as well as industrial best practices.

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	• To ensure that effective measures to address emergency events are in place. • To ensure that the safeguarding of personnel and property through the provision of public or private security is carried out in a manner that avoids or minimizes risks to the project-affected communities and in a manner consistent with international human rights standards and principles. • To help prevent against sexual exploitation, abuse and sexual harassment (SEAH) of members of the community by project workers.	
Operational Safeguard (OS 5): Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement	• To avoid involuntary resettlement where feasible, or minimize resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored. • To ensure that resettlement plans and activities are informed by social assessments including gender issues. • To avoid forced eviction. • To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (i) providing timely compensation for loss of assets	The program will ensure that land where the proposed facilities will be established is legally acquired with the proper land acquisition documents.

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	full replacement cost and (ii) providing sufficient resettlement assistance under the project to support displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher	
Operational Safeguard (OS 6): Habitat and Biodiversity Conservation, and Sustainable Management of Living Natural Resources	• To protect and conserve biodiversity and different types of habitats. • To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity, with the aim of conserving biological diversity and ecosystem integrity. • To reinstate or restore biodiversity informed by the mitigation hierarchy, including where some impacts are unavoidable, through implementing biodiversity offsets to achieve "no net loss but net gain" of biodiversity. • To promote the sustainable management of living natural resources. • To support livelihoods of local communities, including vulnerable groups, and inclusive economic	Not applicable

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	development through the adoption of practices that integrate conservation needs and development priorities	
Operational Safeguard (OS 7): Vulnerable Groups	• To ensure that vulnerable groups and individuals are identified as early as possible in Bank Group operations and that engagement is meaningful, taking into account individuals' and communities' specificities, and delivered in an appropriate form manner and language. • To affirm, respect, and protect the rights and interests of vulnerable individuals and groups throughout the life cycle of the project or investment. • To recognize, respect, and preserve theculture, knowledge, and practices of highly vulnerable cultural groups and minorities including indigenous peoples, and to provide them with an opportunity to adapt to changing conditions that could arise due to project activities in a manner and in a time frame acceptable to them.	Not applicable
Operational Safeguard (OS 8): Cultural Heritage	• To protect cultural heritage from the adverse impacts of project activities and support its preservation. • To address cultural heritage as an integral aspect of sustainable development. • To promote meaningful consultation with stakeholders regarding cultural	Not applicable

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	heritage as a means to identify and address risks and impacts related to cultural heritage. • To promote the equitable sharing of benefits from the use of cultural heritage with affected stakeholders.	
Operational Safeguard (OS 10): Stakeholder Engagement and Information Disclosure	• To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship and channels of communication 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 E&S performance. • To promote and provide the means for safe, effective, and inclusive engagement with project affected parties, inclusive of women's perspectives, in an equitable manner, and vulnerable groups, in a manner free of reprisal, throughout the project life cycle on issues that could potentially affect them. • To enhance project benefits and mitigate harm to local communities. • To ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely,	The program has prepared a stakeholder engagement plan and information shall be shared with the relevant parties following this SEP. Disclosure will follow the Ugandan legal framework.

AfDB Operational Safeguard	Objective	Relevancy of the OSs triggered
	understandable, accessible, and appropriate manner and format. • To provide project-affected parties with accessible and inclusive means to provide input, raise issues, questions, proposals, concerns, and grievances, and allow Borrowers to respond to and manage such grievances. • To promote development benefits and opportunities for project-affected communities, taking into account the needs of women, including vulnerable groups, in a manner that is accessible, equitable, culturally appropriate, and inclusive.	

4. STAKEHOLDERS ENGAGEMENT PLAN (SEP) FOR UBEP

4.1 Stakeholder identification and analysis for UBEP Project

In order to develop an effective SEP for the project, it is necessary to determine who are the stakeholders and understand their needs and expectations for engagement, their interest and objectives in relation to the Project. This information shall then be used to tailor engagement to each type of stakeholder. As part of this process, it will be particularly 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 marginalized or vulnerable status.

It is also important to understand how each stakeholder may be affected or their perception on how they may be affected so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

In general, the nature, scope, and frequency of stakeholder engagement will be proportional to the project and its potential risks and impacts, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group shall intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement shall proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

4.1.1 Affected Parties

Several stakeholders important to this project have been identified and analyzed in respect to location, interest, mandate, influence and vulnerability; and including level of literacy and potential mode of engagement. These criteria are explained below;

I. The location criterion has been used in respect to proximity to the proposed project area. All villages and community members where the project will be implemented have been considered as primary stakeholders using this criterion.

II. Interest criteria have been used in analysis to refer to the level of concern and significance to the project site and proposed project.

III. Mandate refers to consideration for the level of directive reasonability the stakeholder has in respect to the project or the affected project sites. This is usually considered together with influence which implies the ability or powers to influence encourage or discourage project activities.

Vulnerability refers to levels of susceptibility that compromise or makes a stakeholder unable to meaningfully participate in planned stakeholder engagements or equitably benefit from other project activities or outcomes such as the inability to resettle themselves, interpret messages, open bank accounts, and

restore livelihoods among others. This can be a function of literacy, age, gender, physical barriers, relation to land tenure, income and livelihood activities.

4.2 The approach used to identity stakeholders in relation to the criteria involved

I. Review of project relevant documents including the Project Appraisal Document.
II. Consultations with District and sub-county leadership and technical staff in order to identify and categorize stakeholders including vulnerable social groups
III. Consultation with the project proponents and other project development partners such as the OPM, UNHCR, and MGLSD.
IV. In-house brainstorming sessions.

Three categories of stakeholders have been mapped out (across three levels at the national, regional and community) and against the analysis criteria used

- **Direct stakeholders** considered to have high influence and Power in respect to the project, project area and potential impacts and project implementation. These require regular engagements, information dissemination and consultations throughout the ESMP studies and other project phases. These include Project impacted stakeholders (within markets, schools and the local community), all relevant Ministries and Public Institutions, AfDB, regulators like NEMA and ERA, utility companies (UEDCL, UMEME, NWSC), relevant private sector associations, District and Sub-County Local Governments within the project area fall in this category. These are considered as key project promoters given their support, regulatory and/or administrative mandate for the project; and/or proximity to the project beneficiaries or area. The role of some of these stakeholders like District Local Governments and Social Cultural Institutions in stakeholder mobilization, project information dissemination, and ESMP implementation as well as grievances resolution is critical to the success of the project. Vulnerable social groups with high interest but low influence will be identified, supported and encouraged to participate and be consulted as primary level
- **Indirect stakeholders** considered to have either high influence but low power or high power but low influence. These will require to be initially consulted and regularly kept informed. Several government ministries and agencies; CSOs working in the region in areas of livelihood support, conflict resolution, psycho-social support, human rights and vulnerability, environmental conservation and social services support.

4.2.1 Disadvantaged / vulnerable individuals or groups

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the project. The vulnerability may stem from person's origin, gender, age, health

condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. Engagements will be built on what is existing in consultation with local institutions and leaders. Trusted leaders will be identified and will support in the engagements. Communication materials or engagements will be in their distinct languages with the help of skilled translators. NGO's and other partners working in vulnerable communities of the Ik and Batwa among others will also be engaged. Equal representation and participation of all genders in a culturally appropriate manner shall also be employed.

Within the Project Area of Influence, the vulnerable groups will include and not limited to the following;

- Elderly people and veterans of war
- Child mothers
- Persons with disabilities and their careers
- Low-income family's dependent on state support
- Women-headed households or single mothers with underage children
- The unemployed persons.
- Disadvantaged Individuals or Groups

The project will use resources needed to enable the people to participate in the consultation process e.g. providing translation into a language known to them; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns. If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware these groups and how best to communicate with them will be brought onboard.

The project will further take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access project benefits, information, provide feedback, or submit grievances. Stakeholder engagements will be structured in a culturally appropriate and an all-inclusive manner. Focus groups dedicated specifically to vulnerable groups may also be envisaged as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in other sections of this document vulnerable groups within the communities affected by the project will further be confirmed and consulted through dedicated means, as appropriate.

5. STAKEHOLDER'S ENGAGEMENT METHODOLOGY

5.1 Engagement process

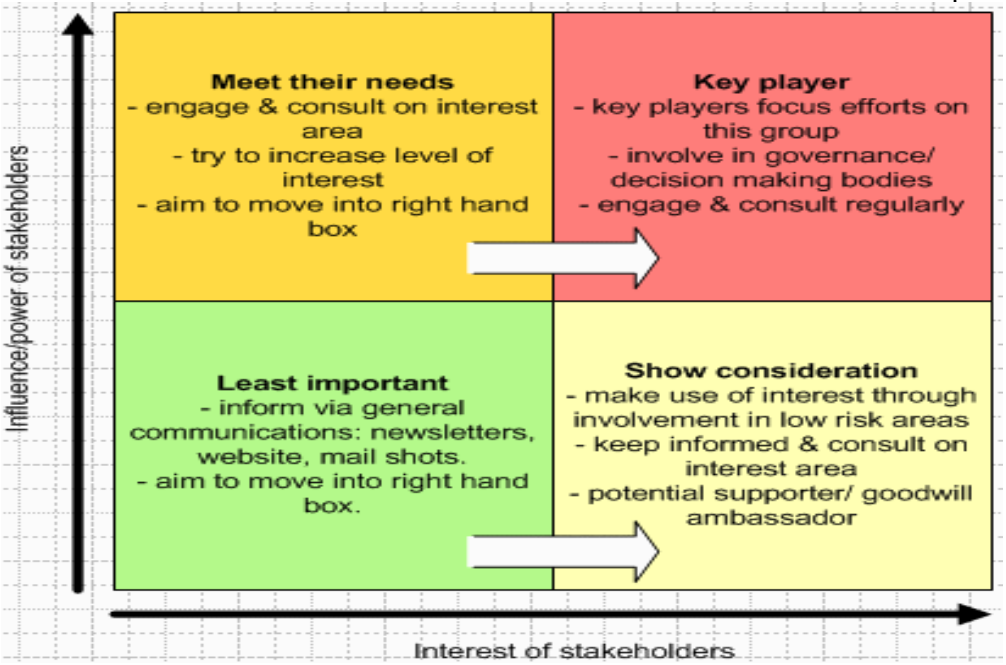
In line with the OS 10, stakeholder engagement process will be a continuous and interactive process involving identification, communication and facilitation of a two-way dialogue with the people affected by the project decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges.

Engagement started during project preparation with stakeholder consultations with affected and interested parties to allow stakeholders' views and concerns to be considered in the project design, implementation, and operation. Below are some of the envisaged activities and processes under the strategy.

5.2 Stakeholder Mapping and Identification

MEMD will execute various stakeholder engagement activities that shall be planned as a part of the development of public consultation for the project to determine the participating parties, individuals, state and Non-Government Organizations that are likely to impact the project or may be affected by the result of the project.

The figures 2 and 3 below provide the guiding processes for mapping and identification of stakeholders in consideration of their interests and levels of influence and power.



Source: Stakeholdermap.com

Figure 2: Influence vs. Interest of stakeholders in the engagement process

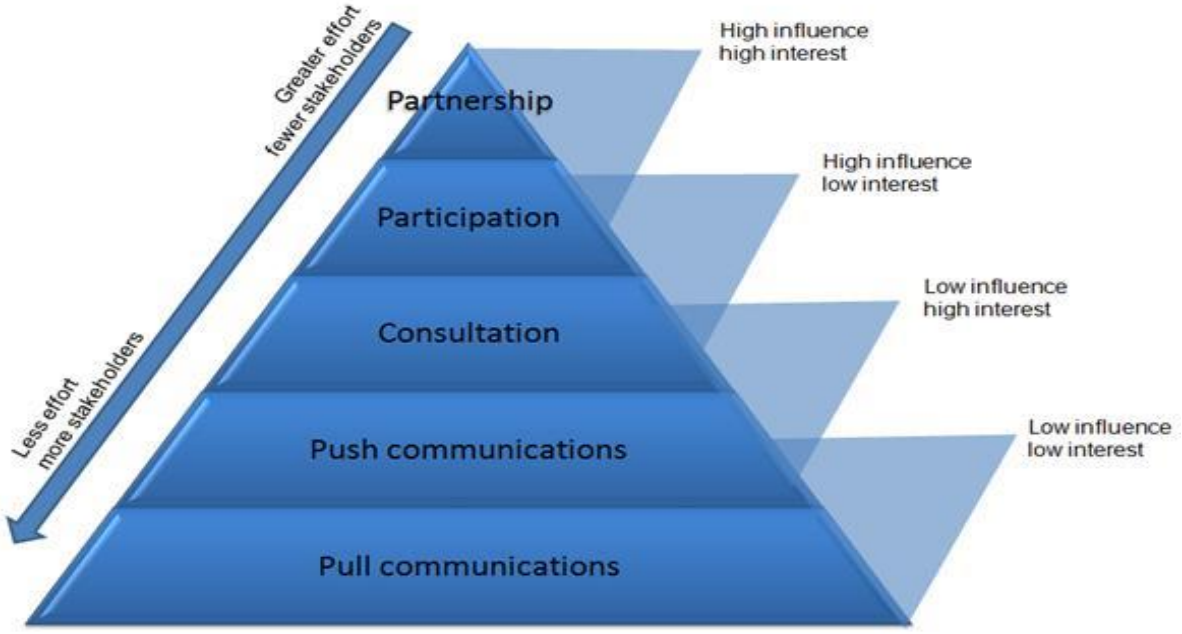


Figure 3: Stakeholder effort and extent of influence

5.3 Proposed Strategy for Information Disclosure

The PIU will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities Such information will be made available to all stakeholders, who are likely to be affected by positive and adverse environmental or social impacts from the project. The information will include:

- Purpose, nature, objectives and scale of the project.
- Duration of proposed project activities.
- Any risks to and potential impacts regarding 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.
- Proposed mitigation plans.
- Available grievance mechanisms.
- Envisaged consultation process, if any, and opportunities and ways in which the public can participate (via the SEP) and,
- Time and venue of any envisaged public meetings Avenues through which information will be disclosed include

Communication Materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and audio form. Communication materials will be

in English and in local languages. Information on grievance redress mechanism shall also be provided.

Table 2: Summary of Stakeholder Engagement Arrangements

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions
Public meetings	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.
Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses
Project website	Present project information and progress updates Disclose ESMP, RAP and other relevant project documentation
Direct communication with affected crops/asset owners	Share information on land acquisition Agree options for removing crops and relocation of fences etc.
Construction signs	Share information on project activities Reminders of potential impacts (e.g. ….)
Project leaflet/flyers	Brief project information to provide regular update Site specific context-appropriate project information.

Table 3: Stakeholder Engagement Activities

Stage	Objective	Key Activities	Target Stakeholders	Responsibility
Preliminary Engagements	To gain a preliminary understanding of the scope of the Project, appropriate and legislated engagement requirements and relevant stakeholders.	• Field visit; and • Stakeholder identification process	• Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups	• MEMD

Table 4: Stakeholders Mapping and Analysis

Stakeholder Group		Interests in Project/ objective of engagement	Significance of influence	Significance of Interest
Project affected parties	*PAPs and project affected communities* Comprising. • Land and building owners. • Tenants. • Business owners	• Loss or damage of property. • Directly affected by project impacts. • Job opportunities • Opportunity for investment	Medium	High
	Vulnerable Persons/Groups including: • The elderly • Terminally ill PAPs • Very poor households • Female Headed Households • Child Headed Households • People with Disabilities (PWDs)	• Inadequate ability to cope with negative project impacts. • Inadequate ability to enjoy project benefits unaided. • Special needs different than the • rest.	Low	High
	Central Government Ministries and Agencies: • Ministry of Energy and Mineral Development (MEMD)	• Overseeing UBEP project implementation. • Government representatives for the project preparation and implementation. • Funds transfer and management. • Compliance enforcement.	High	High
	Local Government: • District Officers	• Permit and licensing. • Inspection of construction works. • Compliance enforcement. • Local project mobilization. • Compliance enforcement. • Grievance Management.	High	High

Stakeholder Group		Interests in Project/ objective of engagement	Significance of influence	Significance of Interest
	Central Government (Ministries and Agencies): • Ministry of Water and Environment (MoWE). • National Environment Management Authority (NEMA) Ministry of Gender Labour and Social Development (MGLSD)	• Inspection of construction works. • Compliance enforcement. • Permit and licensing.	High	High
	Private sector: • Contractors and sub-contractors. • Potential investors in project activities.	• Supply of Project inputs and management of outputs. • Professional and technical services to the projects. • Financial management.	Medium	Medium
	International Development Partners • African Development Bank (AfDB).	• Project loan financing. • Environmental and social safeguard compliance.	High	High
	National and Local NGOs: • Any other NGOs working within the project affected communities.	• Support to the affected	Medium	High
	Media, Political Parties/groups, Religious Organizations • District Media (Community radios). • National media (newspapers, television and radio stations). • Religious denominations.	• Key role in disseminating information on the efforts and results of the project to the public. • Influence on public views and opinions on the projects.	High	Medium

Summary of the Stakeholders' Concerns/issues/Comments

Table 5: Summary of the key stakeholder concerns/comments/views

Stakeholder (s)	Key Issues/Concerns/comments raised
	▪
	▪

5.4 Stakeholder Identification and Analysis

A stakeholder analysis is a process of identifying people before the project begins; grouping them according to their levels of participation, interest, and influence in the project; and determining how best to involve and communicate each of these stakeholder groups throughout. Table 6 below indicates the stakeholder analysis matrix.

Table 6: Stakeholder Analysis Matrix

No	Institutions / Target stakeholders	Relevance to UBEP/ reasons for engagement	Interest/ Impact to UBEP	Engagement type	Frequency of engagement and information to be disclosed	Mode of communication	Timing of engagement	Project phrase
1	Ministry of Energy and Mineral Development	Responsible for implementation of UBEP	High	In-depth engagement	Incidental, weekly, Monthly, Quarterly, Annual	Meetings, video-conferences, support missions, reports, emails and field visits, independent verification agents, mid-term reviews, workshop, sensitizations, supervision among others.	Throughout project life	Preparation, Implementation, Closure

The project will also use print media, radio announcement, internet media, workshops, surveys, project website, direct communication with owners of affected properties, land, crops/asset, among others. The timing for when stakeholder's engagement will be undertaken and information to convey are presented in the table below. Generally, the stakeholder's engagement will be undertaken before, through and after the project construction phase. According to the category of stakeholders, the information to exchange will include the project components, activities, opportunities, challenges, progress, impacts, enhancement and mitigation measures.

Table 7: Stakeholder's levels of consultation and process

Stakeholder group	Communication technics	Timing	Information to convey and or collect
Government Ministries and affiliated agencies	▪ Telephone / email / text messaging ▪ One-on-one meetings ▪ Formal meetings and workshops	One month before the project start, Throughout and at the end of the project	Information on the project components and mobilization of the team for common views for the project implementation Work progress, achievements & challenges.
Contractor and supervision firms	▪ Telephone / email / text messaging ▪ One-on-one meetings ▪ Formal meetings ▪ Workshops/trainings	Before the project start Throughout the project on monthly basis	Induction and awareness rising on and applicable safeguards for the project risks, including rights of employees and local communities. Work progress, achievements, challenges and corrective action plans.
Project Affected People	▪ Print media, text messaging and radio/TV announcements ▪ One-on-one interviews/meetings ▪ Public meetings ▪ Focus group meetings ▪ Surveys ▪ Information boards	Before the project (land acquisition and compensation process) Throughout the construction period on monthly basis	Compensation process and packages in light of Law No 32/2015 of 11/06/2015 relating to expropriation in the public interests and AfDB Operational Safeguard 2 related to Involuntary resettlement: land acquisition, population displacement and compensation. PAPs livelihood and problems associated with involuntary resettlement.
Local community	▪ Print media, text messaging and radio/TV	Before the project start and	Provision of information on the project job, business opportunities, while also

Stakeholder group	**Communication technics**	**Timing**	**Information to convey and or collect**
including vulnerable or disadvantaged groups.	announcements ▪ One-on-one interviews/meetings ▪ Public meetings ▪ Focus group meetings ▪ Surveys ▪ Information boards	throughout the construction period On monthly basis.	collecting information on views and concerns of local community and disadvantaged groups Collection of information on views and concerns of local community and disadvantaged groups;
Non-Governmental Organization (CSO, religious groups.	▪ Phone /email / text messaging ▪ One-on-one interviews ▪ Focus group meetings ▪ Information boards ▪ Meetings/workshops	Before the project start and throughout the construction period	Provision information on the project opportunities and collection of information on views and concerns of CSO and religious groups. Collection of information on views and concerns of CSO and religious groups on quarterly basis

Stakeholder group	**Communication technics**	**Timing**	**Information to convey and or collect**
Private Sector (environmental professional organization, institute of engineers) and business people	▪ Phone / email / text messaging ▪ Print media and radio announcements ▪ Workshops ▪ Focus group meetings ▪ Surveys	Before the project start and during the project implementation	Job and business opportunities associated with the project and consultation on the project risks and practical solutions; Consultation on the project achievements, challenges and solutions
AfDB and other development partners	▪ Phone / email / text messaging ▪ Formal meetings ▪ Workshops/meetings ▪ Training	Before the project start and throughout the construction period Monthly virtual meeting	Provision of information on the project components, activities, risks and measures to avoid, reduce or compensate the project environmental, social and health risks
Media	▪ Phone / fax / email / text messaging ▪ One-on-one interviews ▪ Community radios and TV	Before the project start and throughout the construction period	Information on the project components & activities, opportunities, negative impacts as well as proposed corrective actions Information on the project achievements, challenges and corrective actions

Stakeholder group	**Communication technics**	**Timing**	**Information to convey and or collect**
Security Agencies (Army, Police, Park Rangers, and Other Security Agents)	▪ Telephone / email / text messaging ▪ One-on-one meetings ▪ Formal meetings ▪ Trainings	Before the project start and throughout the construction period on quarterly basis	Information on the project sites, components, activities and their security requirements.

6. STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities will be informed by and regularly updated according to an interactive process of stakeholder identification, analysis and mapping and based on comments received on the stakeholder engagement process. Prior to commencement of stakeholders' engagement, the level, technique/method of engagement and the activity to be carried out will be clearly identified by PIU before communicating to stakeholders. The key project life-cycle phases and associated activities to be considered when implementing stakeholders' engagement are briefly discussed below:

I. Designs and Development of safeguard instruments (ESMF, RAP and ESIA)

II. Environmental and Social Safeguards Implementation and monitoring

29

Table 8: Stakeholder Engagement Activities

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
Preliminary Engagements	To gain a preliminary understanding of the scope of the Project, appropriate and legislated engagement requirements and relevant stakeholders.	• Field visit; and • Stakeholder identification process	• Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups	• MEMD	• 2,000
Scoping Engagements	• To meet key stakeholders and introduce them to the Project and ESIA Process; • To disclose the Project in the public domain to all interested and affected stakeholders; • To gather issues of concern and through this identify a list of potential impacts; • To consult key stakeholders on the next steps in the ESIA process; • To generate feedback on the Draft Scoping Report, including the scope, approach and key issues to be investigated further for the ESIA	• Meetings with key stakeholders to facilitate the broader stakeholder engagement process • Dissemination of engagement materials (background information document, posters, media notices etc.) • Consultation on the proposed Project and associated ESIA through meetings and workshops with identified stakeholders. Details may include: ○ Nature, purpose and scale of the proposed project ○ ESIA & stakeholder engagement process • Confirmation of issue identification and feedback from stakeholders;	• Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups • Non-government organizations (NGOs);	• MEMD • PDSC	• 3,500
ESIA Disclosure	• To discuss the identified impacts and proposed mitigation measures with stakeholders allowing for their input; and • To provide stakeholders with the opportunity to comment on the Draft ESIA report.	• Dissemination draft ESIA Report to all stakeholders. • Copies of the ESIA report will also be distributed in public buildings in the vicinity of the site of the proposed project.	• Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups	• MEMD	• 12,000

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
		• Availability of the draft ESIA Report will be advertised through print and electronic media for public review. • Consultation on the draft Impact Assessment Report. This will include: ○ Identification of impacts in the draft ESIA and proposed mitigation; ○ Identification of stakeholder concerns and opinions on the impacts identified; ○ Involvement of stakeholders in assessing the efficacy and appropriateness of the proposed mitigation measures; and ○ Identification of revisions or additions to the draft ESIA report where necessary	• Business Community • Contractors & Contract Workers • Non-government organizations (NGOs);		
Formal Submission of Final ESIA	Submission of final ESIA Report with comments incorporated from the ESIA engagement and disclosure stage	• Submission of the Final ESIA for approval	• World bank • NEMA	• MEMD	• 2,000
Project Start-up	To introduce the new project to different stakeholders To disclose project design plans, approach and high-level project impacts and risks to solicit public opinion and key concerns from local governments, residents, and key communities of concern	• District awareness raising meetings • Sub County awareness meetings • Project Village awareness meetings	• Local government officials • Project Affected Communities • Vulnerable and disadvantaged groups	• MEMD PIU • MEMD PCU	• 1500
Resettlement Policy Framework (RPF) disclosure and	To share draft policy framework based on national legislations, current practices in the country and Environmental and Social Standards of the Bank and finalised based on feedback and inputs	• Dissemination draft RPF to all stakeholders. • Copies of the RPF will also be distributed in public buildings in the vicinity of the site of the proposed	• Government • Government parastatals/agencies • Local/project affected communities	• RAP Consultant • PDSC • MEMD	• 1600

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
stakeholder consultation		project and uploaded on MEMD website. • Availability of the draft RPF Report will be advertised through print and electronic media for public review. • Consultation on the draft RPF. This will include: ○ Identification of impacts categories based on preliminary survey report and possible entitlements and eligibility criteria; Key principles of resettlement and broad institutional arrangement. ○ Identification of stakeholder concerns and opinions on the contents of the RPF; ○ Involvement of stakeholders in assessing the appropriateness of the proposed resettlement principles, impact categories, entitlements; institutional arrangement for preparation and implementation of RAP. • Assess adequacy of RPF during ESIA and RAP preparation. • Identification of revisions or additions to the draft RPF where necessary.	• Vulnerable/disadvantaged Groups • Business Community • Cultural leaders • Local governments • Non-government organizations (NGOs); • Business community • Women		
Resettlement Action Plan (RAP) disclosure and stakeholder consultation	To share draft RAP based on RPF and specific impact area as per designs subsequently finalised based on feedback and inputs	• Introducing scope of work to Ministerial and district stakeholders • Sensitization meetings at district, sub county and community levels Informing them on the survey process, purpose of valuation, rates, cut-off date, grievance management	• Project affected Persons • Other project affected communities • Vulnerable/disadvantaged Groups • Business Community • Local governments	• RAP Consultant • MEMD	• 3,000

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
		• Land delineation, asset inventory, socioeconomic surveys and verification targeting PAPs • Gaining a deeper understanding on livelihoods, vulnerability, natural resources, replacement land, community development activities, community dynamic • Disclosure of compensation schedules, identify issues, concerns, grievances. • Engage households on bank account opening and financial literacy. • Engage households on payment of compensation. • Undertake site visits for PAPs during construction of replacement housing • Explanation of how to access the grievance mechanism • Present RAP Implementation strategy • Regular updates on RAP Implementation • Engage Ward and Village stakeholders on: • Entitlement briefings • Payment of compensation • Issuing of Notice to vacate • Identification of replacement land • Engage vulnerable PAPs in land acquisition and relocation process • Dissemination of cut-off date and census survey of all affected through structured questionnaire • FGDs and community level meetings facilitated by Sociologists	• Non-government organizations (NGOs);		

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
		• Dissemination of draft RAP to all stakeholders. • Use of Leaflets on non-technical summary of RAP and folk media for the project affected • Copies of the RAP will also be distributed in public buildings in the vicinity of the site of the proposed project and uploaded on MEMD website. • Availability of the draft RAP Report will be advertised through print and electronic media for public review. • Consultation on the draft RAP. This will include: • Identification of impacts categories based on specific impact area based on designs, entitlements and eligibility criteria; Key principles of resettlement and specific institutional arrangement for implementation and GRM. • Identification of project affected concerns and opinions on the identified impacts, RAP implementation Plan and project schedule; • Involvement of stakeholders in assessing the appropriateness of the identified impacts, list of PAPs, entitlement options; institutional arrangement for implementation of RAP and GRM. • Identification of revisions or additions to the draft RAP where necessary.			

Stakeholder Engagement Plan –UBEP project

Stage	Objective	Key Activities	Target Stakeholders	Responsibility	Costs (USD)
Disclosure of Grievance Redress Mechanism	To create awareness on the Project Grievance Redress Mechanism including Grievance redress structures like Grievance Redress Committees (GRCs) from Village level to District level.	• Carry out specific awareness sessions on the project GRM • Printing of Project GRM books, logs etc • Establishment of GRCs • Training of GRCs	• Refugees • VMGs • Women • Local Governments • Project Affected People • Project Affected Communities	• MEMD • RAP Consultant • PDSC • District local governments	• 2,000
Periodic stakeholder engagements	• To keep stakeholders informed of the project progress and garner their feedback on the project • Regular engagement with national government partners to keep them informed of overall Project progress and issues that require joint Project/ Government discussion • Keep government partners informed about the Project's rationale for engaging stakeholders proactively. Keep government informed about engagement activity in general including any meetings or workshops with civil society to which it is appropriate to have Government participation. • Keep PACS and community sub groups informed of Project development	• Periodic stakeholder workshops and meetings on the project progress and garnering feedback on the project	• Women • Refugees • VMGs • Local Government Officials • Contractors	• MEMD PIU • PDSC • RAP Consultant • LICs	• 3,000

Table 9: Stakeholder Engagement Communication Plan

Stakeholder	Communication	Method of Engagement	Cycle
Ministry of Energy and Mineral Development (MEMD)	▪ Project Concept Note Preparation ▪ Field Missions ▪ Project Approval and Contracting ▪ Electrification instructions and verifications ▪ Progress Reports ▪ Record discussions	▪ Formal meetings ▪ Email ▪ Press Statements ▪ Project brief document	Monthly
Ministry of Finance	▪ Project Concept Note Preparation ▪ Field Missions ▪ Project Approval and Contracting ▪ Financing ▪ Record discussions ▪ Implementation steering committee progress reports ▪ Record discussions	▪ Formal meetings ▪ Email ▪ Press Statements ▪ Project brief document	Monthly

Table 10: Communication Channels for stakeholder engagement

Communication Channel	Objective	Target Stakeholders
Media (newspaper) Posters Website	▪ Make announcements regarding the Project; ▪ Inform stakeholders of meetings or the availability of project data. ▪ Inform stakeholders of meetings or the availability of project information.	▪ Government ▪ Government ministries /agencies ▪ Local/traditional communities ▪ Vulnerable/disadvantaged Groups ▪ NGOs; ▪ Contractors ▪ Consultants
Email	▪ To distribute all project notification material to those parties with access to this facility; ▪ To inform stakeholders of availability of project data including tabling of ESMP reports (Scoping report, draft ESMP report etc.), Project briefs, RAPs, GRM, etc.	▪ Government ▪ Government parastatals/agencies ▪ NGOs; ▪ World Bank ▪ Contractors
Face to face meetings: ▪ Workshops ▪ Formal meetings ▪ Community meetings ▪ Focus Group Discussions	▪ To transmit information about the Project, ESIA process, Grid Expansion and Connectivity, GRM, RAP and reinforce two-way dialogue.	▪ All stakeholder groups to be targeted through one of these engagement needs.

7. GRIEVANCE REDRESS MECHANISM

The objective of the grievance mechanism is to resolve and remedy complaints that may result from direct and indirect consequences of the project activities. They will leverage existing Local Grievance Redress Mechanisms, which included Local Chairman 1 (LC1) and relevant stakeholders.

7.1 Grievance Redress committees by Component

Table 11: Grievance Redress Mechanism

Component	Grievance redress committees
	Grievance Redress Committees (GRCs) will be set up at national level as well as all project covered districts – in line with the anticipated works, supplies or services under the project.
	The existing GRM structures will be utilized and supplemented with project specific arrangements. Consultative meetings will be conducted prior to formation of additional Grievance Redress committees (GRCs). The existing structures will be utilized and supplemented with project specific arrangements. Consultative meetings will be conducted prior to formation of additional Grievance Redress committees (GRCs). Accessibility for disadvantaged or vulnerable individuals or refugees will be key during project implementation. The GRM will be designed based on an understanding of the issues that are likely to be the subject of concerns and grievances. Ugandan communities living close to refugee sites have given land to host these refugees, and overall maintain good relations with their neighbor's. A worker's and community GRM will be established.
Component 4: Project implementation support and affordable modern energy solutions	A separate mechanism will be developed to address worker grievances. MEMD, Directorate of Energy Resources Development and UECCC are responsible for managing the GRM, but many of the grievances on the Project will likely relate to the actions of the Contractor and so will need to be resolved by the Contractor. Implementing Agencies with the support of the Implementation Consultant will administer the GRM process deciding whether they or the Contractor is responsible and determining the best course of action to resolve the grievance. The Implementation Consultant will support implementing agencies to monitor grievance resolution being undertaken by the contractor.

Anticipated grievances for the project will include those related to: Loss of land; Crop damage; Sexual Exploitation and abuse; Family wrangles; Noise pollution; Waste Management; Wrongly recorded personal or community details; Wrongly recorded assets including land details and/or affected land area/crops; Recent change of asset ownership; Incorrect computation of compensation; Name missed out of RAP register etc.

MEMD will implement an effective GRM, with the objective of helping third parties to avoid resorting to the judicial system as far as possible. The project's GRM includes two successive tiers of extra-judicial grievance review and resolution: (i) the first tier is the Grievance Resolution Committee (GRC) at the district level; (ii) the second tier is the GRM Focal Persons at implementing Agencies headquarters. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts. All grievance related correspondence will be documented, and the grievance resolution process will be systematically tracked. A standardized grievance log in form will be used for all the

project components. One GRM database will be set up to allow recording and retrieval of all cases received, responses sent, dates of actions taken and responses. The project GRM data base will also monitor adherence to standards, assess, track the extent to which progress is being made to resolve them.

7.2 Grievance Process

The two-stage grievance resolution process involves the following main steps:

a) Receipt of grievances;
b) Screening of grievances;
c) Grievance Resolution Committee (first stage);
d) Implementing agencies resolution at central level (second stage);
e) Closure of grievances;
f) Grievance records and documentation.

These steps are described hereafter.

- **Step 1: <u>Receipt of Grievances</u>**

  Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance:
  By completing a written grievance registration form that will be available at Liaison centers, districts, construction sites, project's website and in implementing agencies offices an example of a grievance log will be provided in the Stakeholder Engagement Plan. The Project's Social Development Officer or Grievance Officer will review the received grievances and record them in a Grievance Register. To promote the principle of accessibility a variety of grievance log in channels will be used such as a dedicated phone number, web sites, e-mails, in-person, anonymous, suggestion box among others.

  Grievances received be written down by the Community Development Officer on the grievance registration form and logged into the Grievance Register. A copy of the logged grievance will be signed by aggrieved person and Community Development Officer

  The Community Development Officers will explain the possibilities and ways to raise a grievance to local communities during meetings organized in each affected area at the time of RAP preparation. The GRM procedures will be disclosed through the Project's website and will also be advertised on billboards/posters in each community and at the entrance of the contractor's yard. Information material on the GRM will also be made available at the information desks in districts traversed by the project.

  In order to ensure that all grievances are captured, the implementing agency will explain how the grievances received by district GRC members may be channeled through the Project's GRM. Training will be conducted for all GRC members on their roles and responsibilities and the implementing agency shall regularly monitor to ensure no grievances are missed.

- **Step 2: <u>Grievance Screening</u>**

  All grievances will be registered, reported and tracked by implementing agency in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances.

The status number and trends of grievances will be discussed during weekly E&S meetings during the construction phase.

- **Step 3: Grievance Resolution Committee process**

  A local Grievance Resolution Committee (GRC) will be established in districts, sub-counties, with an office. Once a grievance has been logged, the corresponding local GRC will be engaged to define a solution to solve the grievance. At this stage the grievance is reviewed in an informal (oral) way and the Grievance Redress Committee members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved the PAP is informed about grievance resolution procedures of Stage 2. A PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 30 days. The GRC shall convene as per necessity (but at least once a month) and shall include six members. Special provisions will be made for any complaints of a confidential nature. Complaints on Gender Based and Violence Against Children shall be received and referred immediately to service providers. The GRC is a five-member committee comprising of the following:

  1) Representative from MEMD
  2) Grievance Officer or CDO
  3) Selected project area GRC member
  4) Representative of a Project Affected People (AP) as a committee member;
  5) Representative of special affected groups (women, refugees, etc.)

  Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP complaints received since the last GRC meeting, and to propose a solution to all grievances within the past one month. Then, the GRC will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

  For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and will also be provided to the PAP before the meeting.
  The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the PAP accordingly.

  The GRC will receive the complainant and discuss with them a solution to their grievance. The committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, these will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the PAP will be explained the Stage 2 escalation process. Stage 3 shall be handled by the implementing agencies heads of department together with other relevant stakeholders.

- **Step 4: <u>Implementing agencies resolution at central level (second stage)</u>**

  If the PAP is not satisfied, the grievance redress mechanism assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

- **Step 5: <u>Closure of Grievances</u>**

  A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures have been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented to the satisfaction of the complainant, a complaint closes out form will be signed by both parties (Representative of the implementing agency, Local councilor 1 and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance then, will be archived in the Project Grievance database. In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome.

- **Step 6: <u>Grievance Records and Documentation</u>**

  The Project Implementation Unit (PIU) will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Contractor or other relevant party; the final result; and how and when this decision was communicated to the complainant. The supervising consultant and contractor in their monthly monitoring reports will provide information on grievance management. Grievance monitoring and reporting will occur in quarterly, annual reports.

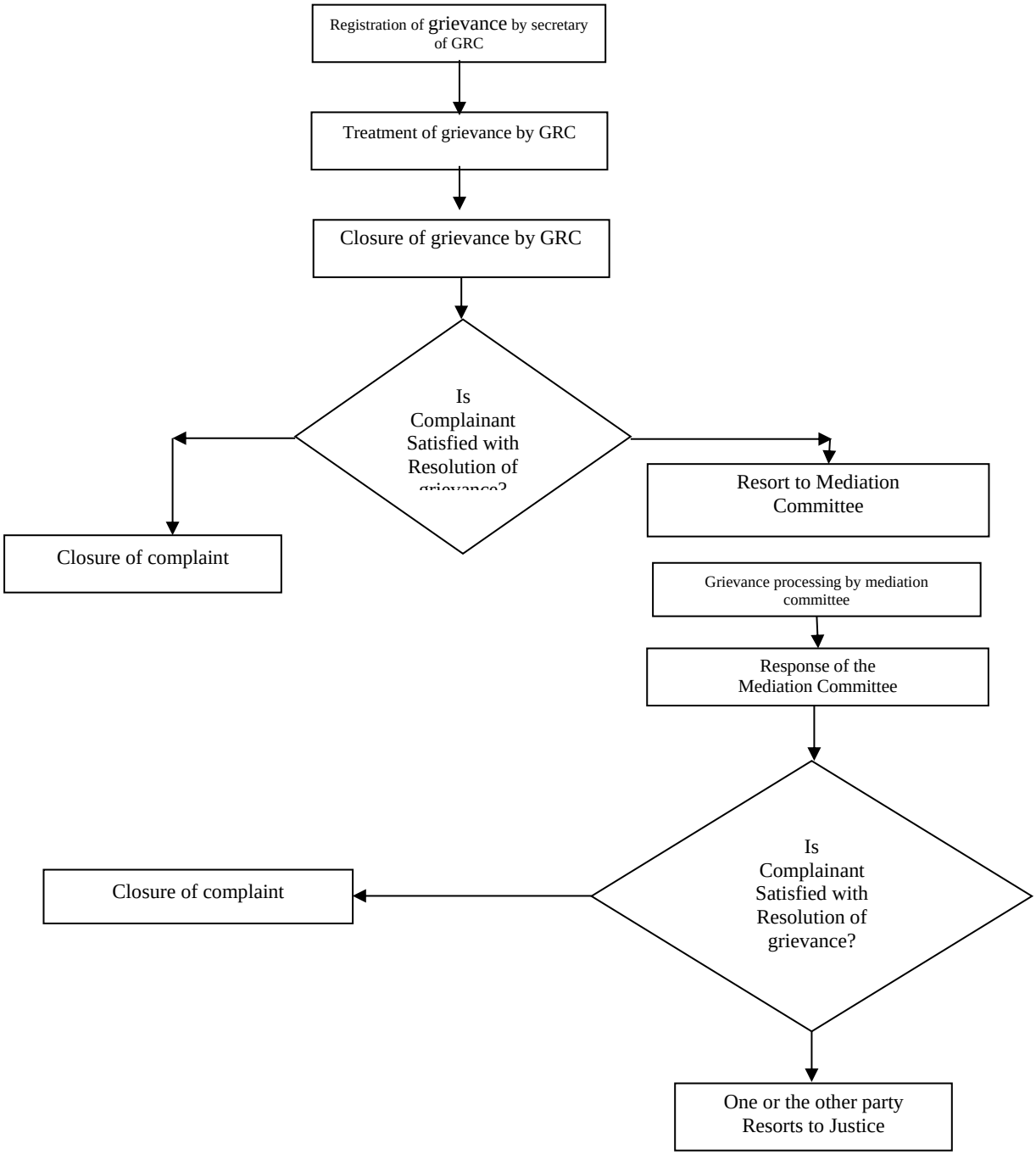


Figure 4*: *The Process Flow Chart of Grievance Redress Mechanism

Workers' Grievance Mechanism

The Implementing Agency will provide a grievance mechanism for workers to raise reasonable workplace concerns. Worker's grievances can be raised during;

1. Tool box meetings,
2. Email,
3. Suggestion box,
4. Anonymous,
5. Site emergency contact numbers, and
6. Designated person among others.

MEMD will inform the workers of the grievance mechanism at the time of hiring, and make it easily accessible to them. The mechanism will use an understandable and transparent process that provides feedback to those concerned, without any retribution. The mechanism will not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective bargaining powers.

Once a worker's grievance has failed to be addressed at contractor's level it is then escalated to the supervision consultant, MEMD and finally to the Project steering committee that shall be chaired by the Permanent Secretary-MEMD. It should be noted that some grievances, and crimes will be directly reported to Justice Law and Order sector. This includes police, law society, Directorate of Public Prosecution, Uganda Prison's Service, among others.

All workers, contractors shall sign Codes of Conduct (CoC) and shall be bound by the clauses therein. Awareness raising, training shall be undertaken prior to signature of CoC and all through during project implementation. This will ensure that all the requirements in CoC's are clearly understood by all workers. This CoC's shall prohibit workers from engaging in SEA, GBV, and VAC while employed under the project. **Sanctions will be applied if a worker is confirmed as a perpetrator such as formal warming, suspension from duty, termination or referral to the police or other authorities as warranted**.

8. INSTITUTIONAL ARRANGEMENT FOR SEP IMPLEMENTATION

8.1 Introduction

The Ministry of Energy and Mineral Development (MEMD) serves as the grant recipient and executing agency for UBEP. Within MEMD -Renewable Energy Department, a dedicated Project Implementation Unit (PIU) will take charge of managing project outputs, monitoring and evaluating project interventions, achieving desired outcomes, and ensuring the efficient utilization of grant resources. The PIU will consist of key personnel, including a Programme Coordinator, Core Technical Team, Accountant, Procurement Specialist, Environmental Safeguards Officer, Gender Expert, and the Monitoring and Evaluation Officer. The PIU will therefore manage all functions to ensure the successful implementation of the stakeholder engagement plan and effective stakeholder engagement.

The successful implementation of the (SEP) for the (UBEP) depends on clearly defined roles and responsibilities of key actors:

- MEMD: As the grant recipient and executing agency, MEMD holds overall accountability for the implementation of the SEP. It ensures compliance with project objectives, coordinates with stakeholders, and guarantees adherence to national and international regulatory frameworks.
- Renewable Energy Department - Project Implementation Unit (PIU): The PIU, established within MEMD, is tasked with the day-to-day management and execution of project outputs.

  Key responsibilities include:
  - Programme Coordinator: Provides leadership and overall coordination of project activities, ensuring the alignment of stakeholder engagement processes with project goals.
  - Core Technical Team: Offers technical expertise to guide the planning, design, and monitoring of stakeholder engagement activities.
  - Accountant: Manages financial resources allocated for SEP activities, ensuring transparent and efficient budget utilization.
  - Procurement Specialist: Oversees procurement processes related to stakeholder engagement materials and services, ensuring compliance with procurement regulations.
  - Environmental Safeguards Officer: Ensures that stakeholder engagement aligns with environmental standards and addresses community concerns about environmental impacts.
  - Gender Expert: Integrates gender considerations into stakeholder engagement activities, ensuring inclusivity and the active participation of women and marginalized groups.
  - Monitoring and Evaluation Officer: Tracks the performance of stakeholder engagement activities using Key Performance Indicators (KPIs), provides regular reports, and ensures continuous improvement.

8.2 Project Steering Committee (PSC):

At the strategic level, the PSC provides oversight and policy guidance for the UBEP. Responsibilities include:

- Reviewing and approving stakeholder engagement strategies and progress reports.
- Ensuring inter-ministerial coordination, particularly between the Ministries of Energy and Mineral Development and Finance Planning and Economic Development.
- Resolving strategic and high-level issues affecting stakeholder engagement.
- Monitoring the overall implementation of the SEP to ensure alignment with project goals.

Together, these actors ensure the SEP is implemented effectively, fostering inclusivity, transparency, and accountability while addressing stakeholder concerns and achieving project success.

9. MONITORING AND REPORTING

9.1. Introduction

Monitoring and evaluation of the stakeholder process is considered vital to ensure the project implementers are able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

i. Sufficient resources to undertake the engagement;
ii. Inclusivity (inclusion of key groups) of interactions with stakeholders;
iii. Promotion of stakeholder involvement;
iv. Sense of trust in District leadership shown by all stakeholders;
v. Clearly defined approaches; and
vi. Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken.

The SEP implementation will be regularly monitored and reported monitoring by Safeguard Specialists. Monitoring will assess documented evidence of SEP activities conducted and verify them on a spot-check basis and/or where concerns arise.

Stakeholder engagement is an important tool in assessing and monitoring certain social and reputational risks (threats to Project Social License to Operate) as well as other risks to the Project such as conflict, blockages or demonstrations. It is also useful in monitoring the accuracy of the predicted impacts of the Project. To ensure the successful implementation of the stakeholder engagement plan; both MEMD PIUs and Contractors will conduct on-going monitoring. This monitoring will include a set of quantitative and qualitative KPIs that contribute to the overall evaluation of whether the objectives of stakeholder engagement are being met and assess both processes and outcomes.

The set indicators will enable a continuous review of engagement processes to ensure that key stakeholders are being reached according to the stakeholder engagement plan and identify hot spots where additional engagement or amendments to contractor practices may be required. MEMD PIU will be responsible for monitoring the success of the engagement measures through ‘self-regulation’ and will implement an ESMS to ensure the appropriate rigour and control is maintained at all times during the construction phase.

An Internal Audit Program shall also be developed by the Contractor as part of its internal control to ensure compliance to this SEP. Contractors will be responsible for monitoring the success of the engagement measures through ‘self-regulation’ and will implement their own ESMS to ensure the appropriate rigour and control is maintained at all times during the construction phase.

Table 12*: MEMD KPIs*

Indicator	Measure/Criteria/ Evidence	Target	Frequency of Measurement
Process Indicators			
Realized vs. planned ongoing SE engagements	%	100	Monthly
Timely update of stakeholder maps and ongoing SE plans	1 or 0	1	Every 6 months
Grievance management KPIs, as per Grievance Procedure			Monthly in a prescribed grievance report
Creation and updates of support material - disclosure material, speaking points etc.- (qualitative)	N/A	N/A	Monthly
Timely disclosure of Quarterly updates to districts and National level stakeholders	1 or 0	1 per quarter	Quarterly
Timely closure on actions of the Stakeholder Engagement team Action Plan (under responsibility of social safeguard Specialist, PIU	%	100	Monthly
Timely closure on actions of the Stakeholder Engagement Risk Mitigation Action Plan (under responsibility of the social safeguard Specialist, PIU)	%	100	Monthly
Analysis of social incidents	%	100 for analysis done for each incident	Monthly
Outcome Indicators			
No. of Social Incidents	Number		Monthly
No. NGO new campaigns / negative reports / articles against the Project	Number		Monthly
Public positive feedback on the Project from key stakeholders (qualitative)	N/A		Monthly

Contractors KPIs

Contractors will measure their performance against the KPIs in the table below as a minimum. However, they may propose additional KPIs in their CIPPs.

Table 13: Contractor KPIs

Indicator	Measure /Target Criteria /Evidence		Frequency of Measurement
Development of Contractor's Stakeholder Engagement Plan (CSEP)	CSEP approved by MEMD PIU	100%	Once after signing the Contract
Timely submission of Specific	%	100	Monthly
Realized Vs. Planned Trainings	Number		Monthly
Realized vs. planned SE	%	100	Monthly
Reach of ongoing SE efforts (per gender, per regions)	Number of participants to SE meetings	N/A	Monthly, with analysis of the
Grievance management KPIs, as per Grievance	Grievance registers and date base		Monthly in a prescribed
Number of audits undertaken by Contractor	Audit records	At least 1 per Quarter	Quarterly
Number of social incidents	Number	zero	Monthly
Analysis of any social incidents	%	100 for analysis done for each incident for	Monthly
Timely closure on actions related to any social incidents	%	100	Monthly
Public positive feedback on the Project from key stakeholders	N/A		Monthly
No and type of disclosure materials developed and distributed/used (including radio	Number Sample materials and tools used		Monthly
No and category of vulnerable groups engaged	Number		Monthly
No of women engaged	Number		Monthly
No of stakeholder concerns recorded and responded to	Number		Monthly
No of daily activity reports submitted	Number		Monthly
Nature and category of district level stakeholders engaged	Names and Positions		Monthly

9.2. Reporting

All contractors are required to report to **MEMD** on environmental and social including human rights issues on a regular basis. Contractors will however, confirm with MEMD PIU whether this reporting and associated data management can be entirely managed within the project, which includes both remote data entry and reporting functions. Contractors shall report to MEMD as detailed in reporting format below with respect to implementing the requirements of this SEP.

Table 14: Reporting Template

Date	Staff member	Stakeholder name	Organization	Engagement activity summary and issues raised	Follow up actions	Action status

Table 15: Associated Stakeholder Engagement Risks

Associated Risk	Before Mitigation			Mitigation Measure	After Mitigation		
	L	I	RR		L	I	RR
Lack of or un approved Contractor Site Specific Stakeholder Engagement Plan and adherence to it				▪ Requisite of Contractor Stakeholder Engagement Plan ▪ Plans required in the Tendering documents and Contracts			

9.3. Reporting

Monthly Reports: The PIU will prepare brief monthly or quarterly reports (whichever is found most appropriate and effective) on stakeholder engagement activities in the reporting framework with the Bank, including:

- Stakeholder activities conducted on monthly basis;
- Public outreach activities (meetings with stakeholders);
- Entries in the grievance register
- New identified stakeholder groups
- Emerging new issues or challenges

Annual/final Stakeholder Engagement Reports: The PIU will compile a report summarizing SEP results on an annual basis. This report will provide a summary of all public consultation issues, grievances and resolutions. The report will provide a summary

of relevant public consultation findings from informal meetings held at community level.

These evaluation reports should be submitted to AfDB and a summary of the results will be provided for the annual report.

Reporting Back to the Communities: It will be the responsibility of the Ministry through the PIU to report back to the communities on matters relating to:

- Main findings from the annual monitoring;
- Sharing and publishing reports and have them available on the website and copies sent to all relevant stakeholders (District, Local authorities, GRCs, etc.).
- Summary of findings published on notice boards.
- Maintain a website with ESIA, RAP documents for purposes of public reporting and disclosure.

In the RAP and monthly E&S implementation reports there will be a review of the engagement activities conducted; levels of stakeholder involvement (particularly targeting for affected communities, women, youth and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder priorities, issues, and concerns are reflected in the reports, particularly with respect to mitigation and monitoring strategies contained in the project ESF documents.

10. SEP IMPLEMENTATION BUDGET

The project has an implementation period of 4 years during which the project stakeholder engagement activities will be implemented throughout project life. A tentative estimation of costs has been proposed depending on arising project need.

Table 16: Budget required for implementation of SEP

Engagement methods	Quantity)	Unit Cost (USD)	Total Cost Estimated (USD)	Sources of funds
Correspondence by phone/email/Text/Instant messaging	36	20	720	MEMD
Print media and TV/radio announcements	9	200	1800	MEMD
Formal meetings/quarterly	9	1000	9000	MEMD
Public consultation meetings	36	500	18000	MEMD
Focus group meetings	3	1000	3000	MEMD
Workshops, food, transport, publications, communication material	3	3000	9000	MEMD
Grievance Redress Committees Trainings for 14 GRC	2	500	1000	MEMD
Press materials published/broadcasted in the local, regional, and national media;	8	1500	12000	MEMD
Grand Total			**54520**	

ANNEXES

Annex 1: Template for stakeholder registry

Name	**Contact**	**Category of stakeholder Primary/Secondary**	**Role/responsibility**	**Expectation or requirement**	**Interest (High, Medium or Low)**	**Influence (High, Medium or Low)**
<Name (job title)>	E-mail: Phone: Address:		<their involvement and role in the project>	<What does the stakeholder require from the project, in terms of deliverables or information? What is their stake in it? What might they gain or lose from the project?>	<Concern or reason for wanting take part in the project>	<Effect on the project>

Annex 2: List of PAPs and Key Stakeholders Consulted

- The Ministry of Education and Sports,
- **ERA**: Electricity Regulatory Authority
- **UEDCL**: Uganda Electricity Distribution Company Limited
- Umeme Limited
- **NARO**: The National Agriculture Research Organisation
- **UNACC**: Uganda National Alliance on Clean Cooking
- **UNBA**: Uganda National Biogas Alliance