

Stakeholder Engagement Plan

Koloma Administrative City

ACC UK Group Ltd

31 May 2024

Quality information

Prepared by

James Askwith
Associate Director

Checked by

Elif Oc
Senior Consultant

Approved by

Iain Bell
Regional Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
Draft 1	December 2023	Draft	Y	IB	RD
Draft 2	May 2024	Draft	Y	IB	RD

Prepared for:

ACC UK Group Ltd

Prepared by:

AECOM Limited
Aldgate Tower
2 Lemn Street
London E1 8FA
United Kingdom
aecom.com

© 2023 AECOM Limited. All Rights Reserved.

AECOM Limited (“AECOM”) has prepared this **Environmental and Social Impact Assessment (ESIA) Report for Koloma Administrative City Project** for the sole use of **ACC UK Group Ltd (ACC)** (“Client”) in accordance with the terms and conditions of appointment **Appendix C. Engagement Letter** dated **06 July 2023** (“the Appointment”).

AECOM shall have no duty, responsibility and/or liability to any party in connection with this report howsoever arising other than that arising to the Client under the Appointment. Save as provided in the Appointment, no warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided by AECOM.

This report should not be reproduced in whole or in part or disclosed to any third parties for any use whatsoever without the express written authority of AECOM. To the extent this report is reproduced in whole or in part or disclosed to any third parties (whether by AECOM or another party) for any use whatsoever, and whether such disclosure occurs with or without the express written authority of AECOM, AECOM does not accept that the third party is entitled to rely upon this report and does not accept any responsibility or liability to the third party. To the extent any liability does arise to a third party, such liability shall be subject to any limitations included within the Appointment, a copy of which is available on request to AECOM.

Where any conclusions and recommendations contained in this report are based upon information provided by the Client and/or third parties, it has been assumed that all relevant information has been provided by the Client and/or third parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in this report. AECOM accepts no liability for any inaccurate conclusions, assumptions or actions taken resulting from any inaccurate information supplied to AECOM from the Client and/or third parties.

Acronyms

Acronym	Definition
AOI	Area of Influence
CLO	Community Liaison Officer
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
EPs	Equator Principles
ESIA	Environmental and Social Impact Assessment
GIIP	Good International Industry Practice
ha	Hectare
IFC	International Finance Corporation
NGO	Non-governmental Organization
NTS	Non-technical Summary
PS	Performance Standard
SEP	Stakeholder Engagement Plan
UKEF	UK Export Finance

Table of Contents

1.	Introduction	7
1.1	Purpose of this Document	7
1.2	Objectives of Engagement	7
1.3	Structure of the Document	8
2.	Project Description	9
2.1	Project Location	9
2.2	Schedule	11
2.3	Project Area of Influence	11
3.	Roles and Responsibilities	12
4.	Regulatory Policy and Framework	14
4.1	National Legal Framework	14
4.1.1	Environmental Code	14
4.1.2	Order on Administrative procedure for Environmental Assessment (amending order A/2022/1646/MEDD/CAB/SGG of 25 July 2022)	14
4.2	International Standards	15
4.2.1	International Finance Corporation (IFC) Performance Standards (PS)	15
4.3	OECD Common Approaches	17
4.3.1	Equator Principles IV (EPs)	18
5.	Stakeholder Identification and Analysis	19
5.1	Stakeholder identification & analysis	19
6.	Stakeholder Engagement Programme	23
6.1	Previous Engagement Activities	23
6.1.1	Previous ESIA's	23
6.1.2	ESIA Phase	25
6.1.2.1	Methodology	25
6.2	Future Engagement Activities	29
7.	Tools, Techniques and Record Management	34
7.1	Introduction	34
7.2	Tools and Techniques for Engaging with Stakeholders	34
7.2.1	Disclosure and Consultation Methods	35
7.2.1.1	Online Disclosure	35
7.2.1.2	Public Consultation Meeting through open meetings	35
7.2.1.3	Expectation Management	35
7.2.1.4	Management of Worker Influx	35
7.3	Recording and tracking of SEP	36
8.	Grievance Mechanism	37
8.1	Overview	37
8.2	Principles	37
8.3	Community Expectations	38
8.4	Responsibilities	38
8.4.1	Grievance Handling	38
8.4.2	Internal Construction Grievance Redress Committee	38
8.5	Implementation of the Grievance Mechanism	38
8.6	Publicizing Grievance Management Procedures	42
8.7	Building Trust in the Mechanism	42
8.8	Request feedback	43
8.9	Appeals and other recourse	43
8.10	Monitoring and reporting of grievance mechanism	43
	Appendix A Grievance Form	45

Figures

Figure 2-1: Project location view (Pink line boundary – 202 ha brownfield site marked for redevelopment by Guinean state and Red line boundary – 7 ha site allocated to the Administrative City Construction Project)	10
Figure 5-1: Stakeholder Analysis.....	19
Figure 8-1. Grievance process flow chart.....	40
Figure 8-2: Signage for the grievance mechanism.....	42

Tables

Table 3-1: Key Internal Stakeholder Tasks and Responsibilities	12
Table 4-1: Stakeholder engagement requirements as set out in IFC Performance Standard 1.....	16
Table 4-2: Summary of Common Approaches Requirements for Public Consultation and Disclosure	17
Table 5-1: Summary of Key Potential Stakeholders following Identification and Analysis	20
Table 6-1. Engagement Activities held during wider Koloma ESIA process in 2023 (Conducted by Chemas Consulting Ltd).....	23
Table 6-2. Engagement Activities held during ESIA Process.....	26
Table 6-3. Stakeholder Engagement Programme	30
Table 7-1: Tools and Techniques for Information Disclosure and Collection.....	34
Table 8-1: Responsible Persons and Contact Details	38
Table 8-2 Grievances received to date.....	44

1. Introduction

1.1 Purpose of this Document

The ACC UK - ACC GUINEE Consortium, wholly owned subsidiaries of ACC Group Ltd and herein to be referred to as Arabian Construction Company (ACC) has been awarded a design and build contract for the development of the Administrative City Construction Project of Koloma, a new office campus in Conakry, Guinea (the Project), by the Société Nationale d'Aménagement et la Promotion Immobilière de Guinée (SONAPI). SONAPI is a vehicle of the Presidency of the Republic, under the financial supervision of the Ministry of Economy and Finance of Guinea, whose role it is to implement and monitor government policy on land development and the construction of social, economic and residential housing. The Ministry of Economy and Finance of Guinea are seeking international funding to finance payments for the development of the Project.

This document is the Stakeholder Engagement Plan (SEP) prepared as part of the Environmental and Social Impact Assessment (ESIA) for the Project.

This SEP outlines a cultural appropriate approach and key steps to be undertaken by the Project, to plan and manage stakeholder engagement activities throughout the Project lifecycle. It is a 'live' document, which will be periodically revised in course of the Project lifecycle, when required. This SEP covers engagement activities carried out as part of the studies associated with the ESIA process which is required in support of proposed funding from Deutsche Bank AG and UK Export Finance (UKEF - the operating name of the Export Credits Guarantee Department which is the United Kingdom's export credit agency and a ministerial department of His Majesty's Government). This document has been prepared in accordance with the lenders' applicable standards including Equator Principles 4 (2020), Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (The "OECD Common Approaches") 2016, the International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability (2012) and the accompanying Environmental, Health, and Safety Guidelines (the 'EHS Guidelines') for the Project.

1.2 Objectives of Engagement

This SEP sets out the process for undertaking engagement and consultation with stakeholders. Consultation with stakeholders is essential to obtaining the social acceptance and facilitating the successful completion of the Project. Stakeholders include local communities potentially affected by the Project activities and other stakeholders not directly affected but who have an interest in these activities or who could affect their progress. These could include national and local authorities, neighbouring projects, and/or non-governmental organisations.

The SEP aims to establish the process and tools to:

- Identify, map, categorise and prioritise Project stakeholders who have influence on the Project or who the Project influences (including any vulnerable groups or communities) and identify and record key issues and concerns that stakeholders may have about the Project.
- Build trusting relationships with local stakeholders based on a transparent and timely supply of information, open dialogue, and provision of opportunities for stakeholders to voice opinions and concerns for informing Project design and mitigation measures, and minimising impacts on local resources and/or stakeholders.
- Keep stakeholders regularly informed about the Project's activities, explaining the nature of the construction and operation as well as decommissioning stages, overall Project duration, and any changes that could generate new impacts or increase the existing ones, and opportunities for grievance and engagement.
- Demonstrate how national requirements, good international industry practice (GIIP) and international standards and guidelines as well as corporate requirements have been addressed in the ESIA.
- Build positive stakeholder relationships and ensure ongoing stakeholder participation during project implementation.

- Implement a viable grievance mechanism to allow stakeholders to register their complaints, comments as well as queries that need to be addressed in a timely manner by the Project.
- Maintain a record of all consultations and grievances using a Stakeholder Database and Grievance Mechanism Database (or similar) to include detailed procedures for receipt of inquiries and complaints, time deadlines for responding to the submitter of the grievance and record keeping.

1.3 Structure of the Document

The SEP contains the following sections:

- Chapter 2 – Project description.
- Chapter 3 – Roles and responsibilities.
- Chapter 4 – Regulatory Policy and Framework.
- Chapter 5 – Stakeholder identification and analysis.
- Chapter 6 – Stakeholder engagement program.
- Chapter 7 – Tools, techniques and record management.
- Chapter 8 – Grievance mechanism.

This document also provides a time schedule for consultations, which may be subject to revisions during project lifecycle. The resources available to implement the SEP are also described in this document.

2. Project Description

2.1 Project Location

The Project site is located on unoccupied land in Ratoma in the north-east of Conakry. The proposed development site ('Site') which is to house the Administrative City Construction Project covers an area of approximately 7 hectares (total site area is 70,591 square metres of surface area) and is located on a larger area of historically cleared brownfield land owned by the Guinean state that totals approximately 202 ha.

The Project includes the development of twelve 7 storey buildings, providing 72,000m² of office space to house Government Ministry departments. The location of the new Administrative City Construction Project is intended to relieve congestion on the Kaloum peninsula and to improve urban mobility by transferring the headquarters of Government Ministries to Ratoma. It is noteworthy to mention that it is not definite at this stage that which governmental buildings/authorities/departments will be moved to the proposed Project site, however from discussions with SONAPI, it seems the vast majority of ministries will be relocated except for defence related ministries.

The Project site is located near the premises of Radiodiffusion Télévision Guinéenne (RTG), the US Embassy, Orange Guinea Headquarters' and Saudi Arabian Embassy's construction sites and the Ministry of Foreign Affairs.

There are also Chinese construction company, China Geo-Engineering Corporation (CEGEP), Kaporu Rail police station, sanitary materials depot, car/truck repair and garage, ACC's welfare facilities and site offices, SEG water tank/pumping station and Kaporu Rail cemetery in the vicinity of the Project site (to the west of the Project site). There is also Kipe Power Station (Central Electrique de Kipe) to the northwest of the Project site (approximately 500 m).

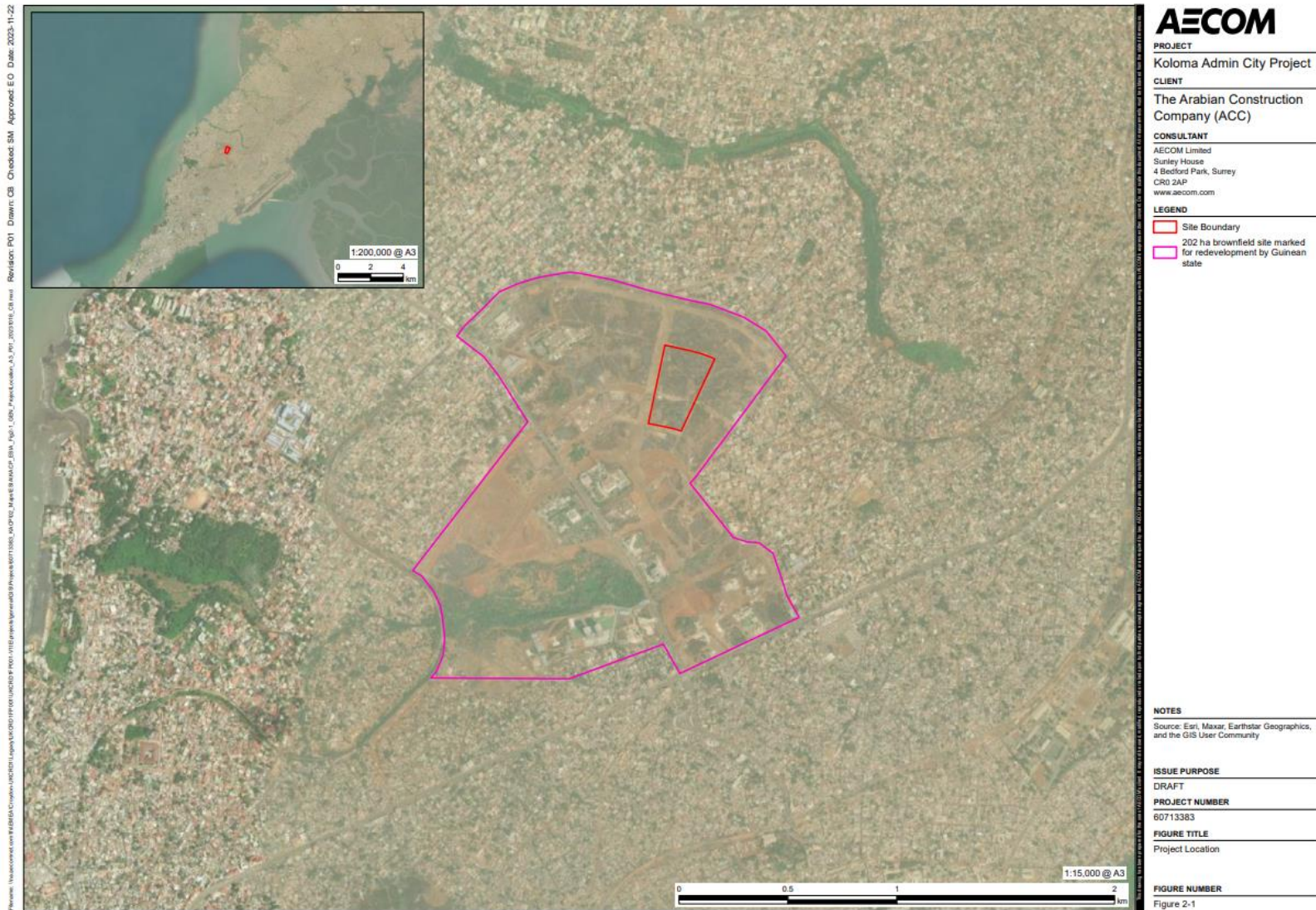


Figure 2-1: Project location view (Pink line boundary – 202 ha brownfield site marked for redevelopment by Guinean state and Red line boundary – 7 ha site allocated to the Administrative City Construction Project)

The Project Site is accessible via Transversale 2 (to the west of the site), which is the main road providing access to the airport from the northern cornice, and RO308 (along the southeast of the site). Access signages were placed at several locations to show access to the Project site. The Project Site is fully fenced off, and two control and guard points were established on site for controlled entrance and exit access (on the west and east of the fence). The Site is currently in the possession of the State through a land title N°09981/2007/TF, and reserved for constructions for public administration, republican institutions, diplomatic missions.

Whilst the site is currently unoccupied, as confirmed on the site visit, the site was historically occupied and subject to two evictions which occurred in 1998 and 2019. These evictions were carried out by the Ministry of Habitat and Construction and have been the subject of much criticism by local communities and NGOs such as Human Rights Watch. SONAPI explained to AECOM that some compensation was awarded for evictions in 1998, however this is yet to be verified by the community. SONAPI has however confirmed that no compensation has yet been paid to displaced families who were evicted in 2019. SONAPI, with support from its consultant Chemas Consulting Ltd, has now recently begun engaging with evicted families and their representative group, "Collectif des déguerpis" (The Collective of the Evicted) with the intention of retrospectively paying compensation in the form of cash and replacement land.

2.2 Schedule

The construction (for both Phase and Phase 2 including test and commissioning) is expected to last approximately 27 months and planned to be finalized by the end of January 2026.

2.3 Project Area of Influence

The Project Area of Influence (Aoi) that has been preliminary defined based on the anticipated environmental and social (E&S) impacts and the presence of receptors broadly includes the following which is also outlined in **Chapter 13: Socio-economics** of the ESIA report:

- Direct AOI is comprised of the Project site location plus a 300m buffer around it where physical disturbance of environmental and social receptors (including the neighbouring communities) might take place as a result of the presence of Project and traffic movement.
- The indirect AOI is an area up to 1 km radius from the site which could potentially be affected by dust/noise, visual/landscape changes, hindered access to places and indirect socio-economic impacts.
- The communities around the immediate surrounding of the Project site and at a wider distance within Conakry were considered. These are areas likely to be affected by economic benefits of the project and may also include labour sending areas.

3. Roles and Responsibilities

This section presents an organisational structure to support ACC and SONAPI in delivering stakeholder engagement activities. Effective stakeholder engagement requires clear lines of communication and effective coordination within the Project, between the Project and partners, and with stakeholders.

Key participants in the management of stakeholder engagement include:

- The current Project owner SONAPI
- ACC In-country Project team; and
- Project consultants and contractors
- The project operator (Ministries housed at the premises, to be confirmed)

ACC in-country Project Team will be responsible for engagement in the construction phase and the Project owner will be responsible for stakeholder engagement throughout the life of the Project. The Project's Environmental & Social consultant will assist the in-country Project Team with engagement activities during the ESIA process, as per the pre-agreed allocation of roles.

Table 3-1 sets out the key roles and responsibilities required to manage the stakeholder engagement process for the Project.

Table 3-1: Key Internal Stakeholder Tasks and Responsibilities

Responsibility	Task	Phase
ACC (Contractor)		
ACC Project Director Aaron Chehab	<ul style="list-style-type: none"> • Ensuring that there is a clear and well-defined strategy to guide stakeholder engagement activities and that the staff, resources and systems are in place to enable the strategy and this SEP to be implemented during the construction phase 	Construction phase
Regional HSE Manager Sumucho Elvis	<ul style="list-style-type: none"> • Providing technical supervision where necessary • Review of monitoring reports • Input into complex grievance investigations where necessary • Ensure this SEP is updated on a regular basis, as when appropriate (including stakeholder lists). • Ensure that the Grievance Mechanism is implemented. • Attendance of key engagement activities during the ESIA construction phase where needed. 	Construction phase
ACC Construction Manager Elie Mehanna	<ul style="list-style-type: none"> • Organisation, logistical arrangements and attendance at key stakeholder meetings. • Supporting with engagement activities where needed. • Attendance of key engagement activities during the ESIA construction phase where needed. • Input into complex grievance investigations where necessary. 	Construction phase
Project HSE Manager Oliver Jangalei Ndango	<ul style="list-style-type: none"> • Ensure this SEP is updated on a regular basis, as when appropriate (including stakeholder lists). • Ensure that the Grievance Mechanism is implemented. • Attendance of key engagement activities during the ESIA construction phase where needed. • Input into complex grievance investigations where necessary. • Monitoring the implementation of the SEP and Grievance Mechanism. 	Construction phase
Community Grevance Management Consultant Didier Bazzo (SEES)	<ul style="list-style-type: none"> • Ongoing maintenance of stakeholder engagement tools (engagement plan, engagement log, grievance mechanism) into the operation phase following the departure of ACC. 	Construction phase

- Community engagement and outreach programs during operations.
- Communicate with the community about upcoming activities, meetings and trainings.
- Prepare posters, press releases, media release and other external engagement where appropriate.

Community Grievance Officer	<ul style="list-style-type: none"> • Responding to the grievant in the first instance and maintain contact with grievant throughout the process, investigating and close out of grievances within input from community leaders. • Prepare posters, press releases, media release and other external engagement where appropriate. 	Construction phase
-----------------------------	---	--------------------

Project's Environmental & Social Consultant

ESIA Social Team <i>(to be involved during EIA/ESIA development)</i>	<ul style="list-style-type: none"> • Providing support to ACC Stakeholder Engagement (SE) Manager during the ESIA phase. • Providing support for organisation, logistical arrangements and attendance at stakeholder meetings as per the pre-agreed allocation of roles during the ESIA phase. • Documenting stakeholder engagement activities. 	ESIA development phase
---	--	------------------------

SONAPI (Project Owner/Operator)

SONAPI	<ul style="list-style-type: none"> • Supporting the ACC and its environmental and social consultant with engagement activities where needed. • Attendance of key engagement activities during the ESIA construction phase. • Conduct all engagements and communications regarding compensation for previously evicted households. • Respond to all compensation related grievances and maintain a separate grievance database regarding the compensation process. • Implementation and resourcing of the Grievance Mechanism in the operational phase following the departure of ACC. 	All phases
--------	--	------------

4. Regulatory Policy and Framework

This section sets out the regulatory policies and framework related with the involvement of the stakeholders in the Project. SONAPI and ACC is planning to receive funding from Deutsche Bank AG and UK Export Finance (UKEF) for the development of the Project. According to the IFC categorisation and the OECD Common Approaches definition, AECOM consider that the Project may meet the definition of Category A given the project has significant social risks and impacts associated with resettlement and livelihood restoration, however it should also noted that the history of the site is complex and there is a current compensation process underway for households previously evicted from the Project site and the wider area in 2019 and 1998 which SONAPI is responsible for.

The national and international requirements are explained in this chapter.

4.1 National Legal Framework

A detailed description of the national legal framework is contained in *Chapter 3: Legislation and Institutional Framework* of the ESIA report. The following are relevant for Stakeholder Engagement.

4.1.1 Environmental Code

Environmental legislation is governed by the Environmental Code (Decree No. D/2019/221/PRG/SGG promulgating Law No. L/2019/0034/AN of 04 July 2019 on the Environmental Code in Guinea) which sets out the legal framework for the preservation, management, use and restoration of natural resources.

Article 11 states: *"The Ministry in charge of the environment shall receive, for its opinion, all draft texts directly or indirectly affecting the environment, all programmes, policies, strategies, plans and projects, and all authorisations involving an impact on natural resources and the environment."*

Article 25 requires any player whose activities may have a potential impact on the environment to carry out an environmental assessment. Articles 27 to 34 describe the purpose, procedure, content and validation of the environmental assessment. The first article (No. 69) of the Code states that *"Sites of historical, archaeological, scientific and cultural importance, as well as plant and animal species of ecological, aesthetic or medical interest, are protected by this Code"*.

4.1.2 Order on Administrative procedure for Environmental Assessment (amending order A/2022/1646/MEDD/CAB/SGG of 25 July 2022)

Article 15 states that all development projects, works or operations likely to harm the environment and classified in one of categories A, B, C or D are subject to a prior Environmental and Social Impact Assessment (ESIA). In accordance with the procedure set out in Order 1595, the various stages in carrying out the ESIA are as follows:

- Submission of the project notice;
- Preliminary sorting;
- Drawing up the scope (scoping) and terms of reference;
- Carrying out the study;
- Examination/analysis of the report;
- Decision-making;
- Implementation; and
- Environmental monitoring and control.

Order specifying the content of the reports required for Strategic Environmental Assessments, Environmental and Social Impact Assessments, Environmental and Social Impact Notices, Relocation Action Plans and Simplified Relocation Action Plans.

A Local Environmental and Social Impact Assessment (EIES) Report was prepared in November 2022 by Administration et Controle des Grands Projets (ACGP) for the Project in line with the national legislation. An Environmental Conformity Certificate was obtained as reported by SONAPI during the meeting held on 13th September 2023 and later the conformity was put on hold by the authorities for this Project. This EIES contained a consultation process which is outlined in section 6.1.

Another consultancy company, Chemas Consulting Group LLC., was appointed by SONAPI for the development of 2 Environmental and Social Impact Assessments (2 ESIA), 2 Involuntary Resettlement Plans (2 IRPs), 1 Livelihood Restoration Plan (LRP) and a Socioeconomic Audit/Reference Situation (ASE/SR) as part of the Koloma Administrative City Project (PCCAK) in line with the national legislation for both for 9 ha of the area allocated for SONAPI (The same Project area which is subject of this ESIA study) and Koloma Directional Center (CDK) area which covers around 202 ha¹. This EIES contained a consultation process which is outlined in section 6.1.

4.2 International Standards

In order to ensure that the Project comply with international requirements (IFC Performance Standards on Environmental and Social Sustainability (IFC PSs), World Bank Group (WBG) / IFC Environment, Health and Safety standards and guidelines, Equator Principles 4) as mentioned below, an ESIA is being conducted and this SEP accompanies the ESIA.

In summary, according to the best practices and the international requirements, an ongoing process of engagement with stakeholders should be initiated during the ESIA process and continued during the project implementation. A documented grievance mechanism needs to be established. Stakeholders should be also identified through the ESIA process. Therefore, this SEP is now offering consultation opportunities for stakeholder as described in the following sections.

4.2.1 International Finance Corporation (IFC) Performance Standards (PS)

The IFC Performance Standards (PS) set out the requirements for undertaking stakeholder engagement throughout the Project lifecycle and requires formal evidence of stakeholder engagement at specific stages of Project development, including key stages within the ESIA process, e.g. ESIA Scoping, draft ESIA preparation, and commencement of operations.

IFC PS 1 'Assessment and Management of Environmental and Social Risks and Impacts (2012)' sets out the requirements relating to stakeholder engagement and the EIA process, particularly in relation to 'Affected Communities'. Further guidance is available in the IFC documents 'Good Practice Manual: Doing Better Business through Effective Public Consultation (1998)' and 'Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (2007)'.

A summary of IFC Performance Standard 1 engagement requirements is presented below. These will be applied by the Project as a benchmark of GIIP.

¹ It is noteworthy to mention that the surface areas mentioned in the Chemas Consultancy's ESIA and associated studies (9 ha and 202 ha) might be slightly different from the areas considered within the scope of this ESIA study. Once the reports become publicly available and completed, the surface areas need to be revisited and confirmed.

Table 4-1: Stakeholder engagement requirements as set out in IFC Performance Standard 1

Issues	Key Requirements
Stakeholder analysis and planning	<ul style="list-style-type: none"> • Identify Project affected stakeholders, including vulnerable groups² • Develop and implement a Stakeholder Engagement Plan
Disclosure of information	<ul style="list-style-type: none"> • Provide stakeholders with access to information on: <ul style="list-style-type: none"> - Purpose, nature and scale of the Project - Duration of proposed Project activities - Any risks, potential impacts and mitigation measures - Proposed stakeholder engagement process - Grievance Mechanism
Consultation	<ul style="list-style-type: none"> • Consultation will be in line with the degree of potential project impacts and will: <ul style="list-style-type: none"> - Begin early and continue throughout the Project lifecycle - Be based on prior disclosure and dissemination of information - Focus on those directly affected - Be free of outside interference and external manipulation - Enable meaningful participation - Be documented
External communications	<ul style="list-style-type: none"> • Implement and maintain a procedure for external communications that: <ul style="list-style-type: none"> - Registers communication - Screens and assesses issues raised - Tracks and documents responses - Adjusts the management programme
Grievance Mechanism	<ul style="list-style-type: none"> • Establish a Grievance Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the Project. • The Grievance Mechanism should: <ul style="list-style-type: none"> - Resolve concerns promptly - Use a transparent and culturally appropriate consultative process
Ongoing reporting to affected communities	<ul style="list-style-type: none"> • Provide periodic progress updates, specifically with regard to issues or grievances communities have raised • Communicate any updates of the management programme • Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually.

Source: IFC Performance Standards, 2012

² Vulnerable stakeholders are defined as those who may be differently or disproportionately affected by the Project due to pre-existing disadvantaged status, or whose situation may mean that they are hard to reach, and/or require differentiated measures in consultation and disclosure activities to allow their effective participation.

4.3 OECD Common Approaches

The OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence is revised on 06 April 2016.

Regarding public consultation and disclosure of Project information, a summary of the Common Approaches requirements is presented below.

Table 4-2: Summary of Common Approaches Requirements for Public Consultation and Disclosure Issues

	Key Requirements
Public consultation	<p>(17) When undertaking a review, Adherents [the ECAs] should indicate to the appropriate parties involved in the project the type of information they require, including, where appropriate, the need for an Environmental and Social Impact Assessment (ESIA). The applicant [the company] is responsible for providing the appropriate information to satisfy Adherents' requirements. The information to be supplied should include, but is not limited to: ...</p> <ul style="list-style-type: none"> The results of any public consultations with local communities directly affected by the project and/or their legitimate representatives and of any engagement with other parties, such as civil society organisations, that have expressed an interest in the project. It is the responsibility of the buyer/project sponsor to undertake any such public consultations and/or engagements with interested parties. For the purposes of public consultations, environmental and social impact information should be made available to affected communities in a language accessible to them. <p>(19) The scope of a review for a Category B project may vary from project to project. Adherents [ECAs] should require appropriate information to be provided by the applicant [Company] that addresses the relevant environmental and social impacts of the project. Such information may be contained in an ESIA or in project-related assessment reports, planning and concept documents, environmental and social studies and plans, technical documentation of pollution control plans and criteria, applicable legal and regulatory frameworks, community engagement activities (information disclosure, dissemination, consultation and other participatory processes) and information collected during discussions with applicants.</p>
Information disclosure on potential impacts	<p>(36) Adherents [ECAs] should, where appropriate, encourage project sponsors [Company] to make ex post monitoring reports and related information including concerning how environmental and/or social impacts are being addressed publicly available at regular intervals, including in forms accessible to local communities directly affected by the project and other relevant stakeholders.</p>
On-going information disclosure	<p>(41) Subject to the legal provisions on public disclosure in Adherent countries, Adherents [ECAs] should make available to the public at least annually environmental and social information on projects classified in Category A and Category B for which an Adherent has made a final commitment with respect to providing official support, including the type of information reviewed and the international standards applied, together with an ECA contact point for obtaining additional information.</p>
On-going information disclosure	<p>Appendices: ...</p> <ul style="list-style-type: none"> Action Plan that (i) describes the actions necessary to implement the various sets of mitigation measures or corrective actions to be undertaken, (ii) prioritises these actions, (iii) includes the time-line for their implementation, and (iv) describes the schedule for communicating with affected communities when on-going disclosure or consultation is expected.
On-going information disclosure	<p>Appendices: ...</p> <ul style="list-style-type: none"> Associated reports, audits, and plans (e.g. Resettlement Action Plan or Indigenous Peoples/ Natural Resource Dependent Community plan, community health plan).
Public consultation	<p>Appendices: ...</p> <ul style="list-style-type: none"> Record of interagency and consultation meetings, including consultations for obtaining the informed views of the affected communities and/or their legitimate representatives and other interested parties, such as civil society organisations. The record specifies any means other than consultations (e.g. surveys) that were used to obtain the views of affected groups.
Information disclosure on action plans	<p>Annex II: ESIA report</p> <ul style="list-style-type: none"> (7) ... Where the buyer/project sponsor identifies measures and actions necessary for the project to comply with applicable laws and regulations and to meet the international standards applied to the project, the management programme will include an Action Plan, which is subject to disclosure to the affected communities and on-going reporting and updating.

4.3.1 Equator Principles IV (EPs)

The Equator Principles (EPs) are common baseline and framework applying environmental and social standards to identify, assess and manage environmental and social risks in projects. EP IV has become effective in October 2020 and comprising ten (10) core principles. “Equator Principle 5: Stakeholder Engagement” outlines the requirements regarding stakeholder engagement consultation and disclosure:

- An effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner.
- An Informed consultation and participation process with potentially affected communities.
- Making readily available the appropriate assessment documentation to the affected communities, and where relevant other stakeholders, in the local language and in a culturally appropriate manner.
- Taking into account of and document the results of the stakeholder consultations as well as including any actions agreed as a result of the consultation.
- Ensuring disclosure early in the assessment process, in any event before the Project construction commences, and on an ongoing basis for the Projects where environmental or social risks and adverse impacts occur.

“Equator Principle 6: Grievance Mechanism” requires establishing a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project’s environmental and social performance promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern.

5. Stakeholder Identification and Analysis

5.1 Stakeholder identification & analysis

In accordance with lenders applicable standards, this SEP shall ensure that relevant stakeholders have been identified and consulted. Stakeholder identification is conducted based on available primary and secondary data information, a review of available Project documentation including national ESIA, input from the Project consultants, as well as being informed by the results of site visits undertaken to date. According to the IFC PS1, stakeholders are defined as persons, groups or communities external to the core operations of a project who may be affected by the Project or have interest in the Project (including individuals, businesses, communities, local government authorities, local nongovernmental and other institutions, and other interested or affected parties).

The key primary stakeholder group will be the local communities around the Project site including those previously evicted, neighbouring land users (particularly related to impacts from the Project activities) and the general public. Other important stakeholders include authorities at national, regional and district level, and non-governmental organizations (NGOs).

Stakeholders were analysed according to the level of impact or interest in the project has on them and also their level influence over the project using the X/Y graph shown below in Figure 5-1. The analysis can be used guide the type and level of engagement with the stakeholder, it should however only be considered a guide and formulaic approach should be avoided.

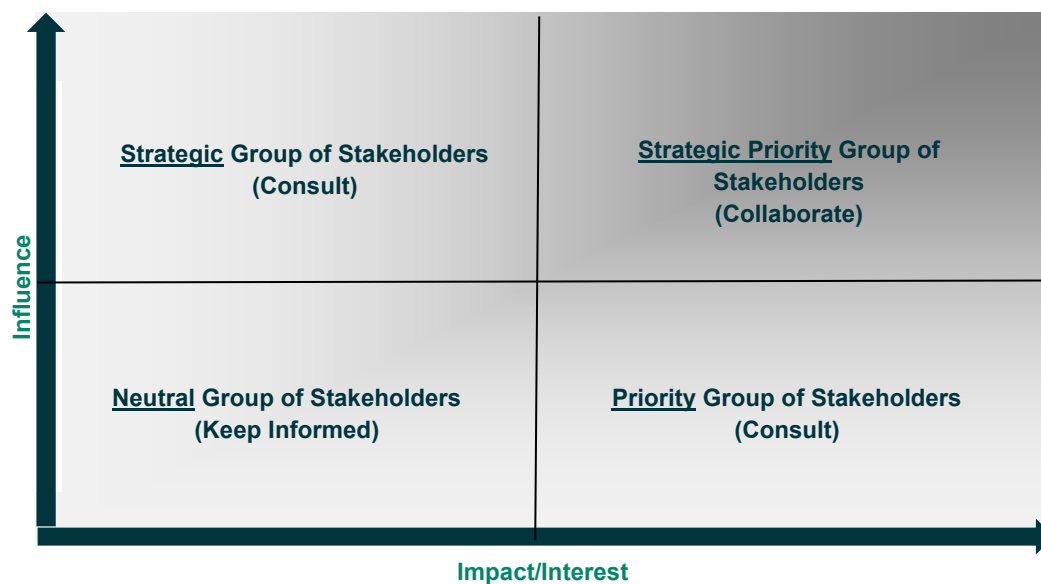


Figure 5-1: Stakeholder Analysis

The stakeholder list will be continuously updated throughout the life of the Project. Table 5-1 outlines the stakeholder groups and potential key stakeholders, as well as their specific relevance to or interest in the Project that have been identified throughout the ESIA process.

Table 5-1: Summary of Key Potential Stakeholders following Identification and Analysis

Stakeholder Group	Stakeholder (Org)	Stakeholder (Individual)	Level of Engagement	Interest/Relation to the Project
Internal Stakeholders	SONAPI	Maimouna Laure May Barry	Collaborate	Project Owner
	Workers from ACC, the Project Contractor		Collaborate	Contractor
	Construction Workers & Workers Representatives	Itragec-sarlu, Mr. Fofana Inza Africa resourcing experts-sarlu, Mr. Amadou Cissoko Guinee travaux interim-sarlu, Mr. Fanta Cisse	Collaborate	Workforce
	Civil Servants and support staff that will be located at project during operation.	Not Yet Available	Consult	Workforce Representatives
	Ministries and workforce to be relocated to the Project	Not Yet Available	Consult	Workforce Representatives
	Local businesses and residences on the roads to the north and southeast of the site on roads RO308, RO363 and RO251	Not Applicable	Consult	<ul style="list-style-type: none"> • Close proximity to the site • Potential perceivable impacts of the Project (dust, noise, glare, visual, water- and land use-related, load on communal infrastructure) • Potential opportunities (employment, community development) • Interested in the compensation process.
China Geo-Engineering Corporation (site to the west of the project)	Not Available	Keep Informed		
Kaporo Rails Cemetery	Not Available	Keep Informed		
Kaporo Rails Police Station	Not Available	Keep Informed		
Community within Kaporo Rail Ward	Not Available	Keep Informed		
Community within Koloma Soloprime Ward	Not Available	Keep Informed		
Guinea Radio and Television	Not Available	Keep Informed		
Sanitation material depot	Not Available	Keep Informed		
Centrale électrique thermique (Thermal Power Plant to the west of the site)	Not Available	Keep Informed		
Orange Guinea headquarters construction site	Not Available	Keep Informed		
Distance >500m	United States Embassy	Not Available	Keep Informed	
	Ministry of Foreign Affairs, International Cooperation, African Integration and Guineans Abroad		Keep Informed	
	Police Department		Keep Informed	

Stakeholder Group	Stakeholder (Org)	Stakeholder (Individual)	Level of Engagement	Interest/Relation to the Project
Authorities and Regulators	Ministry of Energy Département Nationale d'Hydraulique (DNH) Société des Eaux de Guinée (SEG)	Mr KOMARA Mamady, Central Director in charge of Technical Management. Mr. Aboubacar Camara, Deputy General Manager for Investment and Development	Consult	<ul style="list-style-type: none"> • Approvals for and assistance in Project activities within each of the authorities' remit (land issues, water use, energy, transportation, archaeology, investment support, etc.) • Support with providing various baseline information on the area of Project implementation (from the rural district level to the republican level) • Potential assistance in interaction with other authorities and local population/organisations • Regulatory Approvals where necessary
	Ministry of Urban Development, Habitat, and Territorial Administration	Mr KOUROUMA Aboubacar, General Secretary	Consult	
	Ministry for the Advancement of Women, Children, and Vulnerable People		Consult	
	Ministry of Security and Civil Protection		Consult	
	Ministry of Health and Public Hygiene	Mr BALDE Mamadou Seydou Alseny (head of department)	Consult	
	Ministry of Pre-university Teaching	Mr CONDE Djénè Mady, DGA BSD	Consult	
	Ministry of Work and Civil Service		Consult	
	Ministry of Economy, Finances, and Planning		Collaborate	
	Ministry of Culture Tourism and Handcrafts	Mr CONDE Aboubacar Sidiki, National Director.	Consult	
	National Directorate of Family Health and Nutrition	Dr KABA Fadima, National Director. Dr Camara Facinet, Deputy National Director	Consult	
Ministry of Justice and Human Rights	Ms DOUMBOUYA Marie, Operations and Partnership Division Manager	Consult		
Regional, Provincial and Local	Office of Mayor of Ratoma	Mr Mamadou Barry	Consult	
	Soloprime district chief	Kaba Dabo, Chief quartier Soloprime	Consult	
	Collective of the Evicted		Collaborate	
National-General	Grand Imam of Conakry	Elhadj Mamadou Saliou Camara	Keep Informed	<ul style="list-style-type: none"> • Support with providing various baseline information on the area of Project implementation • Potential assistance in interaction with other stakeholder groups • Assistance with identification of impacted people • Potential support on the consultation process
	Archbishop of Conakry	Vincent Coulibaly	Keep Informed	

Stakeholder Group	Stakeholder (Org)	Stakeholder (Individual)	Level of Engagement	Interest/Relation to the Project
				<ul style="list-style-type: none"> Potential to provide opinion on the facility design to facilitate disable people/patient's/employee's access.
NGO	Human Rights Watch	Not Available	Consult	<ul style="list-style-type: none"> National newspapers that can disseminate Project information to a wide audience, may have a general interest on Project activities.
	United Nations Mission for Human Rights in Guinea	Mr Firmin SINDAYE, Head of the Protection Unit Mr Ibrahima Sakoh, Human Rights Program Officer	Consult	<ul style="list-style-type: none"> Interest related to research and education Support with providing various baseline information on the area of Project implementation

6. Stakeholder Engagement Programme

This section describes engagements that have been and will be undertaken throughout the ESIA Process as well as an on-going basis throughout the life of the Project. The programme comprises several stakeholder engagement activities which aim to:

- Build and maintain stakeholder relationships.
- Gather information on the local environmental and social issues.
- Continue to disclose Project information (including any access restrictions, employment and procurement opportunities, and community health and safety issues).
- Monitor and evaluate stakeholder engagement.
- Provide stakeholders the opportunity to provide feedback.
- Manage grievances.

This section presents a summary of the stakeholder engagement programme, namely in two parts: previous engagement activities held during the national ESIA process as well as present engagement activities held during ESIA process and future engagement activities.

Issues identified during the stakeholder engagement process have been recorded in the assessment of impacts in the ESIA and appropriate mitigation has been developed where appropriate.

6.1 Previous Engagement Activities

6.1.1 Previous ESIA's

Three national EIA/ESIA's processes have been carried out, one in 2022 by SONAPI and Administration et Contole des Grand Projets (ACGP) for the Administrative City and two others in 2023 by Chemas Consulting Limited (Chemas) for the wider Koloma Area (ongoing at the time of writing this SEP/ESIA report) as well as for the Administrative City area. The engagement activities for both ESIA's are summarised below.

Table 6-1. Engagement Activities held during wider Koloma ESIA process in 2023 (Conducted by Chemas Consulting Ltd)

Stakeholders Present	Method/Location/Date	Responsibility
Communal Director of the Environment The Municipal Director of the Environment of Ratoma	2022 (Date unknown)	SONAPI and ACGP
Joint public consultation with Sector 4 victim	Nongo Youth Centre 09/08/2023	Chemas (on behalf of SONAPI)
Focus group with women from sector 4	Nongo Youth Centre 09/08/2023	Chemas (on behalf of SONAPI)
Focus group with young people from sector 4	Nongo Youth Centre 09/08/2023	Chemas (on behalf of SONAPI)
Joint public consultation with residents of the Kaporo-rails neighborhood	Ward manager's yard 18/08/2023	Chemas (on behalf of SONAPI)
Joint public consultation with residents of the Koloma Soloprimo district	School classroom public of Soloprimo 18/08/2023	Chemas (on behalf of SONAPI)
Guinean Environmental Assessment Agency (AGEE)	Meeting room AGEE 22/08 /2023	Chemas (on behalf of SONAPI)
Center for Geophysics and Seismology (CGS)	CGS Director's Office 22/08/2023	Chemas (on behalf of SONAPI)

Stakeholders Present	Method/Location/Date	Responsibility
National Wildlife and Forestry Directorate (DNFF)	DNFF meeting room 23/08/2023	Chemas (on behalf of SONAPI)
Commune de Ratoma,	Office of the Director of Microprojects 24/08/2023	Chemas (on behalf of SONAPI)
Members of the collective board	Collective headquarters 26/08/2023	Chemas (on behalf of SONAPI)
Société des Eaux de Guinée (SEG)	Office of the Head of the SEG Communal Centre in Ratoma 29/08/2023	Chemas (on behalf of SONAPI)
Regional Operations Center d'Intervention et de Secours (CORIS)	CORIS meeting room 30/08/2023	Chemas (on behalf of SONAPI)
Direction Nationale de l'Aménagement du Territoire et de l'Urbanisme (DATU) (National Department of Town and Country Planning and Urban Development)	DATU meeting room 30/08/2023	Chemas (on behalf of SONAPI)
Public Validation Meeting	16/05/2024	SONAPI

Issues raised during these engagements include:

- Risk of pollution of the head of the kakimbo spring.
- The felling of valuable trees within the project right-of-way.
- The destruction/profanation of cemeteries and/or isolated graves.
- The inconvenience caused by the noise, dust and exhaust gasses of machinery during the construction phase.
- The effects of climate change.
- Collaboration of all the technical departments in the various soil and subsoil studies was raised as a challenge.
- Compliance with specifications, in particular the types of buildings that must not exceed a certain height.
- Run-off water and waste management issues could impact the immediate neighbourhood and pollute the Kakimbo river.
- Anthropogenic activities can also be at the origin of certain seismic movements, notably the use of explosives in certain quarries.
- Compensation and social support of those evicted.
- Non-recruitment of residents during the works and risks of unmet expectations leading to unrest.
- The project will relieve congestion on the Kaloum peninsula, improve urban mobility and, offer job opportunities.
- Cohabitation of workers and local populations, and the risks of GBV inherent in the project, are also among the major fears expressed.
- Labor issues, such as risk of increased demand for labour, discrimination against local workers, frustrations and industrial action.
- Influx risk including Gender-Based Violence (GBV) or sexual harassment.
- Risks of transmission and spread of STI/HIV/AIDS on the site and in the surrounding neighbourhoods.
- Traffic disruption and road safety risks.

6.1.2 ESIA Phase

During the preparation of ESIA process, stakeholder engagement meetings were undertaken by AECOM's local partner, SEES, between August and November 2023. A site visit was also undertaken by AECOM between 12th and 15th September 2023.

6.1.2.1 Methodology

A list of project stakeholders was identified prior to the engagement sessions. Stakeholders identified include individuals, groups, governmental and non-governmental organizations that may be affected by or may influence project development, either positively or negatively.

In the beginning of each engagement session, a brief introduction and update (including background information for the Project, ESIA process and construction status or progress) of the Project was provided. The format of the engagement varied depending on the number of stakeholder's present and the environment.

The meetings provided an opportunity for communities, institutions and government agencies within Conakry to express their concerns and propose ideas to mitigate those concerns and thereby contribute to improvement of the project implementation.

The engagement included conducting four focus groups with selected local residences located within 300m of the site boundary. This included one focus group for land users and one for women only for Kaporo rail ward and again for Koloma-Soloprime ward.

Minutes were taken during each stakeholder meeting and the key issues that were raised during the consultation meetings are presented in Table 6-2 below. Key issues raised were considered as part of the impact identification and assessment. Further details of these consultations are provided below

Table 6-2. Engagement Activities held during ESIA Process

Stakeholders Present	Location/Date/Method	Summary of Key Issues Discussed	Responsibility
Ministry of Culture Tourism and Handcrafts	3 rd October 2023 Ministry Office	<ul style="list-style-type: none"> Introduce the project. The ministry explained they did not know the area. They asked to do a site visit and survey. 	SEES
National Director of Security of Roads Cournel Tun Kara	10 th October 2023	<ul style="list-style-type: none"> Introduce the project. 	SEES
Director of Urbanism and Land Management	1 November 2023	<ul style="list-style-type: none"> Introduce the project. SEES asked for the original land demarcation but it was explained that this cant be shared. 	SEES
Soloprino District Chief	12 TH September 2023 Meeting held at the chief's residence	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. The Chief gave his own personal account of the historic evictions and his view of the motivations. The Chief also stated he was unaware of any compensation process. The Chief expressed his support for the project but stated that victims of the evictions should be compensated. The Chief also explained how the current site is not safe and they welcome the building of public buildings. 	SEES and AECOM
Mayor of the Commune of Ratoma	12 TH September 2023 Meeting at the major's office	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. The Mayor gave his own personal account of the historic evictions and his view of the motivations. The Mayor stated he was aware of the compensation process underway and he himself has been identified as someone to receive compensation. The Mayor expressed his support for the project but stated that victims of the evictions should be compensated. 	SEES and AECOM
Archbishop Vincent Coulibaly of Conakry	13 th September 2023 Meeting held at the Archbishop's office	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. The Archbishop stated that the evictions were politically motivated and nothing to do religion. The Archbishop stated that the land at Ratomo site has been promised for a cathedral near the US embassy, The Archbishop confirmed there were no religious tensions between Christian and Muslims in Conakry and he has a good relationship with the Grand Imam. The Archbishop confirmed that Muslims and Christians are evenly distributed in Conakry and that the site is not in an area which contains a specific religious community. 	SEES and AECOM
AGEEE	14 th September 2023 Meeting held at the AGEEE office	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. Information was gathered wastewater treatment and waste disposal in Guinea. The direct stated he was familiar with the project and was part of the impact studies. They spent a week searching for sites of heritage importance without success. The Agency noted that, a committee from Environmental Evaluation Agency had undertaken site visit. As informed, the Committee's opinion was that there were no known sites or features of cultural value, and no buried human remains on site. 	SEES and AECOM
Representatives of Collective of the Evicted	15 th September 2023 Meeting held at the residence of the chairman	<ul style="list-style-type: none"> SONAPI raised a concern that the collective was expecting compensation before construction can start. The Collective explained that the project is welcome and that construction can start and that compensation will follow. SEES explained that if anything happens on site to stop the project, the collective will likely be blamed. 	SONAPI and SEES

Stakeholders Present	Location/Date/Method	Summary of Key Issues Discussed	Responsibility
Land users and residents of Kaporo rail ward	25 th September 2023	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. Discussion of the community history and profile, minority and vulnerable groups, demographic trends and migration, location of community assets, sources of income, access to healthcare. Mobility and traffic in Conakry was raised as an issue and a concern by the participants. Environmental protection was seen as important but the current empty space at the project site was seen as a reminder of their neighbours who were evicted. Tensions and conflicts within the community were mentioned but they were being managed by religious leaders. Participants expressed frustration over the loss of access across the whole Koloma site, the lack of compensation and lack of engagements before the project fences were erected. Frustration was also expressed over the current site perceived as a "bandit nest" and unsafe. Concern was raised about dust noise and traffic. Perceptions of the project were positive but high expectations were expressed regarding youth employment. 	SEES
Land users and residents of Koloma rail ward	22 th September 2023	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. Discussion of the community history and profile, minority and vulnerable groups, demographic trends and migration, location of community assets, sources of income, access to healthcare. Traffic and domestic waste in Conakry was raised as an issue and a concern by the participants Environmental protection was seen as important but the current empty space at the project site was seen as a reminder of their neighbours who were evicted. Tensions and conflicts within the community were mentioned but they were being managed by religious leaders. Participants expressed frustration over the loss of access across the whole Koloma site has hindered business and the fences going up has blocked shortcuts. Participants were concerned about the high cost of living that the opening of the site could cause in the ward 	SEES
Women of Koloma ward	26 th September 2023	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. Discussion regarding livelihoods of women, family and domestic responsibilities, distribution of control over household finances social issues including domestic violence. Participants expressed support for the project but had high expectation of employment for the project. Concerns were raised regarding traffic accidents and also unwanted attention given to young women and girls by the construction workforce. 	SEES
Women of Kapro rail ward	27 th September 2023	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. A map of the site was shared. Discussion regarding livelihoods of women, family and domestic responsibilities, distribution of control over household finances social issues including domestic violence. Participants expressed support for the project but had high expectation of employment for the project and training for women. 	SEES
Ministry of Education Djene Mady CONDE	1st November 2023 At the Ministry Office	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. The Minister raised an issue that there is not enough quality teachers at all levels and not enough infrastructure (e.g school buildings) this is because the level of pay is too low to retain teachers. It was explained that normally the law says no more that 2000m between home and school (but this is not the reality) Level of success of moving from primary to secondary is 50% They have a challenge finding technical courses They have no information on the parents and children so there is not enough students in this type of school. 	SEES

Stakeholders Present	Location/Date/Method	Summary of Key Issues Discussed	Responsibility
Guinea Water Society (director of technical management) Mamady Komara	1st November 2023 At the Ministry Office	<ul style="list-style-type: none"> The minister didn't know anything about the evictions SEES introduced the project and explained the purpose of the meeting and the ESIA process. The Minister explained they need 250,000 cubic meters by this year for pipeline plus the long term source of water. Likely to have a drought. This is why quality of water is not good. When the pipe is empty, then bacteria and oxidisation then fill up again and water. All the water comes from the south coast, all the water needs to be pumped over the mountain, the tank near the site is very important for them. The issue with illegal water extraction. This year there have been 6184 illegal connections. They have a few projects to increase distribution for the Conakry and they found finance for first part but they other money for the rest. 	SEES
Ministry of Health Balde Mamadou Saydou (chief of risk management department) (national director for monther and child and nutriciaian) Kaba Fadima	1st November 2023 At the Ministry Office	<ul style="list-style-type: none"> SEES introduced the project and explained the purpose of the meeting and the ESIA process. The Minister explained they lack of qualified medics and infrastructure. There is no education of medics. Most doctors are from other countries in Africa. Greatest illness were malaria, water borne diseases, Ebola and Covid 19. Traditional medicine is agreed by the ministry, this form of medicine is very important for population, first they go traditional medicine and after that they go to the hospital. There is not enough control on this type of medicate. Traditional medicine specialists must have an agreement from the ministry to do to the job. 25% of children less than 5 years old are malnourished. 46% of pregnant are anemic. 	SEES
Representatives of Collective of the Evicted	Meeting held at the residence of the chairman 30th January 2024	<ul style="list-style-type: none"> MFC and SEES interviewed the Collective to understand their story and their perceptions of the projects and the support they had received from SONAPI and Chemas. Questions were asked about the survey process and the data that was collected. 	
AGEEE	Meeting held at the AGEEE office 31st of January 2024	<ul style="list-style-type: none"> MFC and SEES interviewed AGEEE to understand the status of the conformity certificate and discuss the impacts of the project. 	
DATU	Meeting held at the DATU office 31st of January 2024	<ul style="list-style-type: none"> MFC and SEES interviewed DATU to understand the process for land titling for the replacement land. 	
Guinea Water Society (director of technical management) Mamady Komara	Phone Call 8th May 2024	<ul style="list-style-type: none"> SEES called Guinea Water Society to understand the water capacity and demand in Conakry and understand the plans for increased capacity over the next 10 years. 	
DATU	Meeting held at the DATU office 9th May 2024	<ul style="list-style-type: none"> Meeting with DATU to discuss drainage on the site. It was explained that there are no maps of drainage in the Ratoma area. 	

6.2 Future Engagement Activities

The future planned engagement methods are divided into the following categories:

- **Notification methods:** Used to inform stakeholders and the general population of the SEP activities and the project development process.
- **Disclosure and consultation methods:** Used to provide information to stakeholders or to engage in a two-way dialogue by which information is shared with the stakeholders and these in turn can express their views and concerns about the project.
- **External grievance mechanism:** System to receive and facilitate resolution of the stakeholder's concerns and grievances about project-related issues.

Table 6-3 describes the proposed timeline for the stakeholder engagement during the ESIA, construction and operation phase of the Project and the tools that are proposed for each stakeholder engagement phase and for each type of stakeholder.

The draft SEP will be updated to account for ongoing engagement during construction and operational phases.

Table 6-3. Stakeholder Engagement Programme

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification	Responsibility
ESIA DISCLOSURE PHASE						
All stakeholder groups	<ul style="list-style-type: none"> Disclosure online for 30 days 	June-July 2024 ACC Website	<ul style="list-style-type: none"> Disclose the results of the ESIA study online. This will include: <ul style="list-style-type: none"> The ESIA (English Only) The SEP (English Only) The NTS (English and French) 	<ul style="list-style-type: none"> ESIA, non-technical summary (NTS) and SEP 	<ul style="list-style-type: none"> Media announcements Website announcements 	SEES on behalf of ACC
CONSTRUCTION PHASE						
All stakeholder groups	<ul style="list-style-type: none"> Leaflets in public places Media announcements Noticeboards 	Monthly/Quarterly updates as required	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction. 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Media announcements Website announcements. Notice posted in public locations. 	ACC/SEES
Soloprino District Chief	<ul style="list-style-type: none"> One-to-one meetings Phone calls 	Quarterly District Chief Office	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction. Explanation of grievance mechanisms. Discus strategies to manage labour influx. Gather feedback on local perceptions or issues with the project. Communicate the Grievance Mechanism 	<ul style="list-style-type: none"> Notices, leaflets, letters. 	<ul style="list-style-type: none"> Phone Call 	ACC/SEES
Mayor of the Commune of Ratoma	<ul style="list-style-type: none"> One-to-one meetings Phone calls 	Mayors Office Quarterly	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction. Explanation of grievance mechanisms. Discus strategies to manage labour influx. Gather feedback on local perceptions or issues with the project. Communicate the Grievance Mechanism. 	<ul style="list-style-type: none"> Notices, leaflets, letters. 	<ul style="list-style-type: none"> Phone Call 	ACC/SEES
Local communities in the immediate surrounding	<ul style="list-style-type: none"> One-to-one meetings Phone calls Public event 	To occur at least every six months at an appropriate venue	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction. Raise awareness of community health and safety and any dangers around the construction zone. Explanation of grievance mechanisms 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Media announcements Notice posted in public locations 	SEES on behalf of ACC

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification	Responsibility
			<ul style="list-style-type: none"> Advertise potential employment opportunities or local procurement opportunities. Manage expectations about opportunities and direct workers to the employment agencies. Explain that anyone coming directly to the site entrance looking for work will be turned away and that local hiring agencies should be approached. Discourage small informal vendors from setting up too close to the project where it might be unsafe due to project traffic. Communicate the Grievance Mechanism 			
Local Hiring Agencies	<ul style="list-style-type: none"> One-to-one meetings Phone Calls Emails 	Monthly or Quarterly (As required)	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction. Advertise potential employment opportunities or local procurement opportunities. 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Phone Calls Emails 	ACC
Employees/Workers	<ul style="list-style-type: none"> Notices Internal Meetings 	Site offices To occur at least monthly	<ul style="list-style-type: none"> Disclosure upcoming changes in workforce uptake/slowdowns or retrenchment. Raise awareness of HSE as per internal HSE plans. Communicate internal grievance mechanism. 	<ul style="list-style-type: none"> Notices Induction meetings Weekly/Monthly meetings 	<ul style="list-style-type: none"> Notices Site Announcements Phone Calls Emails 	ACC
Regional Government Agencies	<ul style="list-style-type: none"> One-to-one meeting 	Government Offices To occur at least Quarterly	<ul style="list-style-type: none"> Disclose and discuss the construction status and any major events due to take place such as major labour uptake, commencement of new phases or the end of construction, component delivery or any new activity which may require notice given or authorisation. 	<ul style="list-style-type: none"> TBC 	<ul style="list-style-type: none"> Personal interaction 	ACC
OPERATION PHASE						
General Stakeholders	<ul style="list-style-type: none"> Leaflets in public places Media announcements 	Monthly for the first 6 months as operation commences, then annually.	<ul style="list-style-type: none"> Disclose and discuss the status of operation activities and any changes in environmental policy, plans and procedures that are followed. Disclose the opening of Administrative City and the various ministries moving in. Promote the various services available at the Administrative City. Raise awareness of community health and safety. Explanation of grievance mechanisms Advertise potential employment opportunities (if applicable) 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Website announcements. Notice posted in public locations. 	SONAPI (Or operating entities)

Stakeholder Category	Stakeholder Engagement Methods	Location/ Timeline	Purpose	Consultation Disclosure Materials	Mean of Advance Notification	Responsibility
			<ul style="list-style-type: none"> Advertise potential procurement and local business opportunities. 			
Local communities	<ul style="list-style-type: none"> Leaflets in public places One-to-one meetings Phone calls 	Monthly for the first 6 months as operation commences, then annually or as and when required.	<ul style="list-style-type: none"> Discuss other community benefits and manage expectations. Raise awareness of community health and safety. Implementation of grievance mechanism Making comment/complaint forms available at the gates. 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Website announcements. Notice posted in public locations Personal interaction 	SONAPI (Or operating entities)
Workers at Administrative City	<ul style="list-style-type: none"> One-to-one meetings 	Monthly for the first 6 months as operation commences, then annually or as and when required.	<ul style="list-style-type: none"> Disclosure upcoming changes in workforce uptake/slowdowns or retrenchment. Raise awareness of HSE as per internal HSE plans. Implementation of the grievance mechanism. 	<ul style="list-style-type: none"> Notices Leaflets 	<ul style="list-style-type: none"> Website announcements. 	SONAPI (Or operating entities)

Regarding all future engagement activities, considerations will be made for vulnerable groups. Resources distributed in meetings will be differentiated in a way appropriate to individuals. The stakeholder engagement programme will include activities which specifically target Affected Persons as well as disadvantaged and vulnerable groups. The identified vulnerable groups in the ESIA include:

- Young families (where the parents are under 30) who have lost both parents
- Children and young people
- Families with disabled parents or children
- A widow
- A single parent family
- A single retired person
- An elderly person (over 65 years old)
- Women in the family
- People in poor health
- People who are discriminated against
- Households under the poverty line
- Households in financial difficulty
- Households who do not have access to water
- People who evicted and do not receive compensation
- Refugees or internally displaced

The project will ensure that vulnerable people are included and represented in engagement meetings by ensuring that vulnerable or discriminated people are invited to meetings and that meetings are accessible to the physically disabled. During the meetings, the views of discriminated or marginalised groups or individuals will be sought and any suppression of views from other attendees will not be tolerated. Any materials generated for engagement should be in the appropriate language include illustrations for any illiterate attendees. Where appropriate, female only meetings can be held when discussing gender sensitive issues.

7. Tools, Techniques and Record Management

7.1 Introduction

This section briefly describes tools and techniques that will/may be used for engaging with stakeholders, including frequently asked questions and answers, and specific tools and techniques that will/may be employed to share information with stakeholders and collect and compile their feedback.

7.2 Tools and Techniques for Engaging with Stakeholders

A variety of tools and techniques can be used to disclose Project information and collect engagement data. The key tools and techniques that can be used for the Project are summarised in Table 7.1.

Table 7-1: Tools and Techniques for Information Disclosure and Collection

Aim	Tool/Technique	Description
Share and disclose information	Public meeting	Allows disclosure of information to a wide range of stakeholders. Project information can be made available in printed format and Project staff can provide verbal explanations. Should not be used as the sole means of information disclosure but consider combining with a technique that can reach less vocal and mobile stakeholders (e.g. poster/flyers/leaflets, letters, and media).
	Poster/Flyer/Leaflet	Use posters, flyers or leaflets to keep all stakeholders informed about the status and progress of the project. A means to reach stakeholders who are less likely to participate in a public meeting. A poster/flyer/leaflet can also be used to explain the grievance mechanism. These methods will be deployed two weeks in advance of a specific activity (e.g. public consultation), if possible, to allow for word of mouth dissemination of the relevant information
	Letter	A means to disseminate project information. Can also be used as a feedback mechanism to update stakeholders on how their comments have been considered. Combine with flyer and consider including a Comment Form.
	Media (radio, print, TV)	Television and print media can be used nationally. Useful to disclose information regarding permitting, and employment and any specific project progress updates.
Collect and compile information and feedback	Focus group discussion (FGDs)	Can be used to explore perceptions on specific issues in depth.
	In-depth informal interview	Useful technique to build rapport with stakeholders and to learn their individual perspectives on the Project. This is a time-consuming process and usually reserved for key stakeholders.
	Comment Form	A means to learn information from stakeholders individually and to allow less vocal stakeholders to share their views on the Project. Should be used at public meetings.
	Grievance Form	To collect information from a specific stakeholder relating to a specific project activity or activities and provide the stakeholder with a record of receipt/acknowledgement of their grievance.

Source: Adapted from 'Techniques for Effective Public Participation', International Association for Public Participation, 2011

The notification methods outlined below can be used for announcing information disclosure and consultation activities.

7.2.1 Disclosure and Consultation Methods

Disclosure of relevant project information will help communities to be affected and other stakeholders understand the risks, impacts and opportunities of the project. Providing stakeholders with complete, accurate and understandable information is essential to allow meaningful participation. Consultation methods provide a mechanism for stakeholders to provide feedback and share their concerns, complaints or suggestions about the Project.

7.2.1.1 Online Disclosure

Online disclosure allows for quick and free access to documents for all stakeholders that have internet. Documents disclosed online will be disclosed at a website created for this purpose by the Project.

The following documentation will be publicly disclosed:

- Draft ESIA
- Draft Stakeholder Engagement Plan (this document).
- Non-technical summary of the ESIA
- Environmental and Social Action Plan as part of ESIA

7.2.1.2 Public Consultation Meeting through open meetings

Open meetings allow for stakeholders to share their views and opinions, promoting transparency as all stakeholders can see that the same information is shared with everybody and community members can learn about the position of their representatives. Any individual that goes to a meeting will be allowed to attend and share his/her concerns.

During the construction phase presentations will disclose all relevant information to the attendees, in a visual and oral manner, to ensure that illiterate attendees get all the information. A significant amount of time in the meeting has to be allowed for the stakeholders to express their views. Every point raised by the stakeholders will be replied to and all comments, questions and answers will be minuted.

If any assistance is required to attend a public meeting, the Project will take the necessary measures to ensure that they can attend or to provide the relevant information and gather their feedback.

Consultation meetings will be conducted for the ESIA phase and at regular intervals by the HSE manager who is responsible for engagement on a quarterly basis during construction and yearly during operation.

7.2.1.3 Expectation Management

In all engagements with local communities, expectations about employment and project benefits should be managed. While it is important to communicate opportunities to local people and highlight the project benefits, the project should not make promises that it cannot keep or raise expectations to the point it becomes impossible to meet them. The following steps should be taken to manage expectations:

- Avoid making specific commitments to employ a certain number of local people unless the project knows it is able to.
- Record all commitments made verbally or officially in an engagement database or a separate commitments database so they are not overlooked by the project.
- The presence of international staff or delegates from lenders or international consultants on site can raise expectations of the level community benefits.
- Ensure this stakeholder engagement plan is implemented and engagement messages are developed before each meeting and engagement staff are prepared before the meeting so that unplanned commitments are not made.
- Engage with community leaders to communicate the limits of the project and diplomatically lowering expectations where they may have been over inflated.

7.2.1.4 Management of Worker Influx

Worker influx is expected to cause impacts on communities as described in the ESIA. Stakeholder Engagement will form an important part of the mitigation to manage worker influx. The following steps should be undertaken:

- The project will seek to employ local people from the immediate surroundings of the project rather than employing workers from outside of Conakry for example.
- The project has already held workshops and worker fairs to encourage local workers and businesses to seek opportunities with employment agencies.
- Clear communication with community leaders and the workforce on ways to seek employment through the agencies and discouragement of opportunistic workers gathering at the gates.
- Communicate the formal working practices at the Project and the need for employment contracts and the code of conduct.
- Employees at the project should be briefed on how to manage influx by communicating the employment opportunities, but also managing expectations and the need to seek employment through agencies.
- Employees should be made aware of the Code of Conduct to and should be briefed on how to behave when interacting with communities, particularly with local informal business around the project site.
- Any contractors working on the project should be required to sign up to the Code of Conduct and abide by similar measures to avoid influx.

7.3 Recording and tracking of SEP

Transparent documentation of engagement activities will enable tracking of stakeholders' perceptions and concerns regarding the development of the Project and facilitate the identification of additional stakeholders and stakeholder groups.

Suggested monitoring and evaluation activities are outlined below:

- Monitoring media coverage for The Project
- Keep records of all engagement activities including meetings attended, community meetings, focus group discussions, etc.
- Keep copies (electronic or hard copy) of all communication material.
- Conduct stakeholder interviews to gauge level of satisfaction.
- Develop and assess performance in terms of Key Performance Indicators (KPIs). Some suggested KPIs include:
 - Number of engagement activities facilitated quarterly - by stakeholder group and engagement type;
 - Number of attendees at stakeholder engagement activities (expected vs actual); and
 - Number of grievances received per quarter.
- Revise plans and activities.

8. Grievance Mechanism

A key requirement of the IFC PS1 is the establishment and communication of an effective and adequate Grievance Mechanism. Effective implementation of a Grievance Mechanism is crucial to the management of grievances from the local community and other stakeholders. It is an integral part of the SEP and engagement process and should be reflective of the scale of impacts and expected risks of the Project.

8.1 Overview

Project's stakeholders need a trusted way to voice and resolve concerns linked to a project's operations especially from the nearby surrounding communities and facilities. A locally based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together. **ACC will only be responsible for the management of grievances related with the services it provides during the construction phase and also grievances of workers that are working at these services. Grievances related with the compensation process or historic grievances related to the evictions will be under the responsibility of SONAPI.** The objective of the grievance mechanism as follows:

- Increase the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances.
- Keep ownership of the dispute in the hands of local people.
- Offer an early, efficient, and less costly way to address concerns.
- Open channels for effective communication
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect & promote productive relationships

AECOM, on behalf of ACC in this SEP document, has developed a grievance mechanism for the Project in accordance with IFC's Performance Standards and Guidance Notes which present various principles and good practice measures on grievance mechanisms.

8.2 Principles

The United Nations Guiding Principles (UNGP) on Business and Human Rights lists several "effectiveness criteria" for the successful implementation of a Grievance Mechanism. The UNGP states that it should always be:

- **Legitimate:** it must have a clear transparent and sufficiently independent governance structure to ensure that no party to a grievance process can interfere with the fair conduct of that process;
- **Accessible:** it must be publicised to stakeholders who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal;
- **Predictable:** it must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer, and means of monitoring the implementation of any outcome;
- **Equitable:** it must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms;
- **Rights-compatible:** it must ensure that its outcomes and remedies accord with internationally recognised human rights standards; and
- **Transparent:** it must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

8.3 Community Expectations

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem.
- An honest response to questions about company activities.
- Modification of the conduct that caused the grievance.
- Some other fair remedy (options include: an apology /compensation).
- In voicing their concerns, they also expect to be heard and taken seriously. Finally, ACC, SONAPI, contractors, or government officials must encourage people that they can voice grievances and work to resolve them without retaliation. It is important to note that stakeholders are to be informed that the grievance mechanism can be used to submit complaints anonymously.

8.4 Responsibilities

8.4.1 Grievance Handling

The grievance mechanism implementation team during the construction phase shall be comprised ACC's, Construction Manager, HSE Manager and the Community Grievance Management Consultant. Clear lines of responsibility and accountability will be established within the implementation team.

It is important that all members of the team are adequately trained in stakeholder engagement. It is important that the person receiving grievances be a local person, who is fluent in both French and a local language and any other local customs.

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the contact information provided in Table 8-1.

Table 8-1: Responsible Persons and Contact Details

Construction Phase
Community Grievance Management Consultant Phone: 613 163 171 Email: plainte.cite.adm.koloma@gmail.com

8.4.2 Internal Construction Grievance Redress Committee

In addition to the responsible persons, a Construction Grievance Redress Committee will be set up with the following objectives:

- Reviewing quarterly engagement and grievance monitoring reports from ACC
- Assisting in investigations where required
- Implementing the appeal process

The Construction Grievance Redress Committee will consist of:

- ACC Construction Manager
- ACC Health Safety & Environment (HSE) Manager
- A Representative of the affected party
- Community Grievance Management Consultant

8.5 Implementation of the Grievance Mechanism

It is important to reiterate that the aim of the grievance mechanism is to establish a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the project's environmental and social performance. The grievance mechanism has the Affected Communities as its primary beneficiaries. It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally

appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies. The stakeholders will be informed and consulted about this grievance mechanism during the stakeholder engagement process undertaken for the ESIA. The grievance mechanism will be actively publicised during the lifecycle project.

The grievance mechanism for the project will comply with the following principles:

- Clarify at the outset what is the purpose of the procedure.
- Assure people that there will be neither cost nor retribution associated with lodging a grievance.

The entire process (i.e. how a complaint is received and reviewed, how decisions are made and what possibilities may exist for appeal) will be made as transparent as possible by putting it into written form, publicising it and explaining it to relevant stakeholders.

The grievance mechanism will be published at different locations and through letters to the authorities and clarifying that everyone is welcome to make use of it. All information about grievance procedures, grievance forms, and responses will be available in local language. Access to the mechanism will be free of cost.

Raising a complaint can pose risks for people, especially if it concerns issues such as corruption, misconduct, compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism will include precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a complaint, as well as an option to submit anonymous grievances.

Handling grievances encompasses a step-by-step process as well as assigned responsibilities for their proper completion.

The Project will follow the process' steps discussed in the sections below.

A flow chart below in Figure 8-1 illustrates the process for submitting, receiving and addressing grievances.

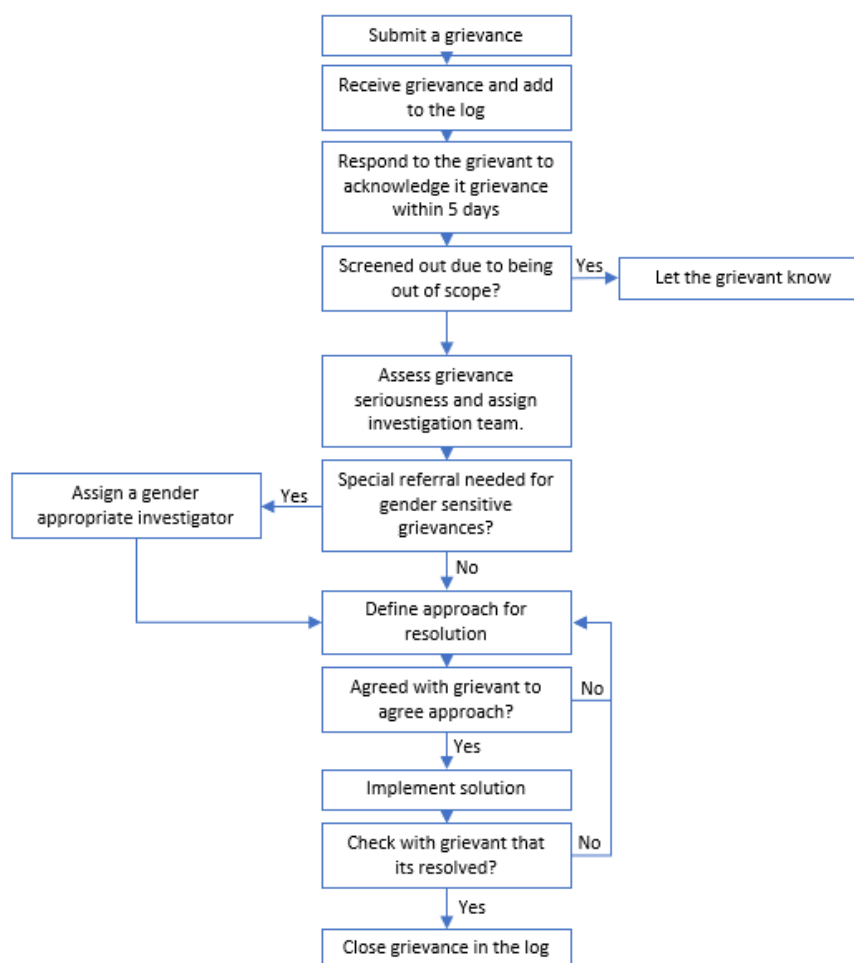


Figure 8-1. Grievance process flow chart

Once received, the grievances will be acknowledged as soon as possible by the Grievance Officer (a member of SEES), specially trained for this work and mastering French and the local languages spoken mainly in the commune of Ratoma (Soussou and Pular)(within 5 or less working days from receipt).

the officer must ensure that the following information is complete:

- Name (anonymous complaints are accepted),
- Full address and contact details,
- Telephone,
- Does the complaint relate to the ongoing compensation process?
- Does the complaint concern the ongoing construction operations for the project?
- Description of the complaint (whether it is a one-time or ongoing problem, whether it is an incident or
- Location of the problem,
- Your suggestion to solve the problem.
- Means of communication desired for the further processing of the complaint.

A formal confirmation—with a complaint number, or other identifier, and an initial timeline for response will be provided by the Project’s EHS manager within 15 days. Most grievances should be resolved within 15 days of receiving the grievance, for more complex investigations, the complainant will be updated within two weeks of the grievance being received and an updated timeline of how it will be resolved will be provided. The Project will issue a first letter of acknowledgement, stating what is outside the scope of the mechanism and what alternatives communities can use to address issues.

A grievance log will be kept, documenting all the actions taken to address each grievance. The Project will take full responsibility for investigating the details of grievances coming through its grievance mechanism, following the principle of “no cost”.

There will also be a special protocol for Gender Based Violence (GBV), Sexual Exploitation Acts (SEA) and Sexual Harassment (SH). This will include a safe, confidential and accessible grievance mechanism which is utilisable by the local community. An anonymous line will also be established for reporting which is gender sensitive. ACC will determine, after reading the officer's report, whether the case requires appropriate care based on gender or vulnerable sensitivity. ACC will assign a gender-appropriate investigator for cases where the sensitivity is gender-sensitive.

Any grievances which are raised regarding the compensation process or historic grievances about the evictions will be re-routed to the SONAPI.

It is important that the process is easily accessible and not intimidating to stakeholders.

During the assessment of the grievance, the EHS Manager will:

- Determine who will conduct the assessment. Typically, the EHS Manager will perform this task or direct it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a team member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
 - Identify the parties involved.
 - Clarify issues and concerns raised by the complaint.
 - Gather views of other stakeholders, including those in the company.
 - Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (minor, significant or major). Seriousness includes the potential to impact both the company and the community.

The grievance investigation team will provide a proposal to resolve the complaint, which will have the backing of the Senior Management. The EHS Manager will then contact the complainant to get an agreement on the proposed solution.

If all parties accept the proposed solution, the agreed actions will be implemented in the established timeframe. In the case that complainant does not accept the proposed resolution, the Project should re-assess the situation and make sure that all alternatives within the grievance mechanism are explored. If agreeing on a solution acceptable to all parties is not possible within the grievance mechanism, the complaint will be referred to external mechanisms.

When formulating a response, the Project will ensure that:

- The response considers the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- If necessary, the EHS manager presents and discuss the response to the complainant or will hold a meeting with the relevant organisation manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator to agree next steps.
- If the case is complex and a resolution time frame cannot be met, The Project will provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

Close-up monitoring of a complaint will be undertaken, if possible, by collecting proof that the necessary actions have taken place (for example a confirmation letter from the complainant and/or photos or other appropriate evidence that the grievance has been closed)

8.6 Publicizing Grievance Management Procedures

The grievance mechanisms will be publicized through posters (located at the project site, residential areas within 1km of the site), future consultation meetings with the community, letters (and online letters) to local and provincial authorities.

All information about grievance procedures, grievance forms, and responses will be available in French and a local language. Access to the mechanism will be free of cost. All written and/or verbal complaint will be recorded by the Project.

The project has signage near the construction site to inform the public the Grievance Mechanism as shown below in Figure 8-2. The display panel contains the procedure for filing a grievance, the phone number and steps in the procedures.



Figure 8-2: Signage for the grievance mechanism

8.7 Building Trust in the Mechanism

In order for community members to have trust in the Grievance Mechanism and be free of hesitation to use it, the project can take the following steps:

- Develop a formal and structured process that is consistent
- Ensure complaints are well documented
- Survey stakeholders about their perceptions
- Create an appeals process
- Provide for independent investigations
- Share information to complainants on their rights throughout the process
- Create an appeals process
- Provide for independent investigations
- Share information to complainants on their rights throughout the process

8.8 Request feedback

The Project will seek sign-off from the complainant(s) that the grievance has been resolved and request any feedback they have. This will be achieved via a Grievance Resolution document.

All grievances are to be signed off at an appropriate level of seniority of staff. The staff member who signs off the complaint should have sufficient knowledge about the topic to provide assurance. Once sign-off has occurred, this will be recorded in the grievance form.

8.9 Appeals and other recourse

If the complainant is not happy with the outcome of the grievance process, they may lodge an appeal which will automatically trigger another investigation by the Grievance Redress Committee. If the grievance is not resolved even after an appeal, the complainant may utilise other external channels such as:

- Raising an official complaint with community leaders.
- Contacting the lenders directly through their independent accountability mechanisms
- Seeking legal resource

Any grievances not signed-off as resolved will be investigated further.

8.10 Monitoring and reporting of grievance mechanism

The grievance mechanism will be monitored and evaluated. Suggested monitoring and evaluation activities are outlined below:

- Monitor the grievance log in terms of response times to address complaints lodged as well as the recurrence of complaints over time.
- Gauging level of stakeholder satisfaction as a secondary aspect to other stakeholder engagement meetings.
- Monitor media coverage of the Project.
- Keep records of all engagement activities including meetings attended, community meetings, focus group discussions, etc.
- Keep a library (electronic or hard copy) of all communication material.
- Conduct stakeholder interviews to gauge level of satisfaction.
- Develop and assess performance in terms of Key Performance Indicators (KPIs).
- Revise plans and activities.

The agent in charge of receiving complaints must send a daily report if at least one grievance is recorded in the register during the day. The Project will report internally to the Grievance Redress Committee at least quarterly on grievances received (both open and closed), and how they were resolved.

Table 8-2 Grievances received to date

Complainant	Date when complainant was informed of action	Date when action was taken	Date when grievance was received	Grievance	Are further actions needed (Y/N): If yes, please add details	Status of Complaint

Appendix A Grievance Form

Grievance Form

I, (full name)

Resident at:	
Tel:	Fax:
E-mail:	

Wish to raise the following complaint or concern (include location and duration of problem):
--

Preferred method of communication (verbal, written, other):

Signed:	Date:
.....	
.....	

