



NETWORK REINFORCEMENT AND ACCESS PROJECT (NRAP)

STAKEHOLDER ENGAGEMENT PLAN

DECEMBER 2022

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List of Acronyms

CANGO	Coordinating Assembly for NGO's
CES	CES Environmental and Social Advisory Services
CLO	Community Liaison Officer
CSS	Construction Site Supervisor
EEA	Eswatini Environmental Authority
EEC	Eswatini Electricity Company
EHS	Environmental, Health and Safety

ENTC	Eswatini National Trust Commission
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESIA	Environmental and Social Impact Assessment
FGD	Focus Group Discussion
GBV	Gender Based Violence
GoKE	Government of the Kingdom of Eswatini
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
I&AP	Interested and Affected Parties
IBRD	International Bank for Reconstruction and Development
KII	Key Informant Interview
kV	Kilovolt
LMP	Labour Management Procedure
MCC	Marketing and Corporate Communications
MNRE	Ministry of Natural Resources and Energy
MTK	MTK Sustainability Consultants
MVA	Mega Volt Amp
NATIC	Nhlangano AIDS Training Information and Counselling Centre
NCCU	National Children's Coordinating Unit
NERCHA	National Emergency Response Council on HIV and AIDS
NGOs	Non-government organizations
NRAP	Network Reinforcement and Access Project
NSC	National Steering Committee
PAP/s	Project Affected Person/s
PCP	Project Contact Person
PIU	Project Implementation Unit
Project	Eswatini Network Reinforcement and Access Project
RA	Regional Administrator
RAP	Resettlement Action Plan

RPF	Resettlement Policy Framework
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan
SHERQ	Safety, Health, Environmental, Risk and Quality
SSO	Social Standards Officer
SWAGAA	Swaziland Action Group Against Abuse
SNL	Swazi Nation Land
WLSA	Women and Law in Southern Africa-Swaziland
WB	World Bank

Definition of Key terms

Asset survey	A survey undertaken to identify and assess all assets by owner and / or rights holder.
Census	A survey of all persons who will be displaced by a project that captures all Appropriate socio-economic baseline data of affected persons and their households and records their assets to determine eligibility for compensation and other support
Household	A group of persons who may or may not be related, but who share a home or living space, who aggregate and share their incomes, and evidenced by the fact that they regularly take meals together.
Livelihood	A livelihood comprises the capabilities, assets and activities required for a person to make a living such as: wages from employment; cash income earned through an enterprise or through sale of produce, goods, handicrafts or services; rental income from land or premises; income from a harvest or animal husbandry; share of a harvest (such as various sharecropping arrangements) or livestock production; self-produced goods or produce used for exchange or barter; self-consumed goods or produce, food, materials, fuel and goods for personal or household use or trade derived from natural or common resources; pensions; various types of government allowances (child allowances, special assistance for the very poor); and remittances from family or relatives.
Compensation	Payment in cash or in-kind for an asset such as land and improvements on land, or a resource that is acquired or affected by a project.
Cut-off date	The date of the commencement of the valuation of assets of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and / or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees and woodlots) established after the cut-off date will not be valued or compensated.
Grievance mechanism	A grievance mechanism is a process for receiving, investigating, responding to and closing out complaints or grievances from affected communities in a timely, fair and consistent manner
Grievance	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as 'concern', 'complaint' and 'issue'
Complainant	An individual, group or organization who submits a grievance to the company.

Concern	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as ‘complaint’, ‘grievance’ and ‘issue’.
Anonymous Grievance	Grievances where the identity of the complainant is not known to the company.
Community	A group of people who share a common sense of identify and interact with one another on a sustained basis.
Stakeholder	Individuals or groups who can affect, or are affected by, or have a legitimate interest in the company’s performance. Stakeholders can include, but are not limited to: government officials, communities, NGOs, media, contractors, business organizations and legislative and regulatory authorities.
Gender-based violence	Is an umbrella term which includes many harmful behaviors? These include Sexual Exploitation and Abuse (“SEA”) and Sexual Harassment (“SH”).
Project Affected	Any individual who, as a result of the land acquisition required for the Project, Person (PAP) loses the right to own, use, or otherwise benefit from a built structure, land residential, agricultural, pasture or undeveloped / unused land), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Resettlement	The displacement or relocation of an affected population from one location to another within the national territory, and the restructuring or creation of comparable living conditions.
Resettlement Action Plan (RAP)	A plan that provides a comprehensive set of actions for addressing impacts related to physical and economic displacement. It describes the procedures and activities that will be taken to compensate for losses, mitigate adverse project impacts, and provide development benefits to those who will be resettled or displaced as a result of a project.
Resettlement Policy Framework (RPF)	A requirement for projects with sub-projects or multiple components that cannot be identified before project approval. The framework clarifies resettlement principles, organizational arrangements, and design criteria to be applied to subprojects to be prepared during project implementation.
Sexual exploitation	any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).
Sexual harassment	Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.
Sexual Abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).
Service provider	An organization that provides a holistic approach in responding to GBV survivors

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1. INTRODUCTION

1.1 Overview

This document is an update of the original Stakeholder Engagement Plan (SEP) that was prepared during the project preparation phase and disclosed on July, 2019. The original SEP forms part of the Environmental and Social Impact Assessment (ESIA) for the Network Reinforcement and Access Project (NRAP)—hereafter referred as “Project”.

This version of the SEP is updated to mirror: i) Project engagements that have taken place from 2020 to 2022 including ESIA/ESMP disclosure, Resettlement Action Plan process thus far, GBV Action plan activities including GRM process for GBV related issues of the NRAP ii) Considerations and tools to be used to engage stakeholders in time of Covid-19, and unrests iii) Schedule for engaging stakeholders from March 2022 to March 2023/4. It also mirrors the updated annex section with latest minutes, reports, registers attached as proof of engagements and what was discussed and agreed on.

1.2 Project Information

The Government of the Kingdom of Eswatini (GoKE), through the Ministry of Natural Resources and Energy (MNRE) and the Ministry of Finance (MoF), received financing through a Loan (Loan No. IBRD 89810) from the World Bank for the implementation of the Network Reinforcement and Access Project (‘the Project’), Project No. P166170. Component 1 of the Project entails the construction of an 82 km long 132 kV transmission line, the construction of two new substations, as well as the expansion of the Nhlangano II Substation and the Hluthi Switching Station which seeks to increase electricity supply in the Shiselweni region.

1.3 Project Development Objective (PDO)

The project development objective is to *strengthen the electricity network to improve the quality and reliability of service and increase access to electricity in the Shiselweni region*

1.4 Project Components

The Project is divided into four major components, as follows:

Component 1 – Transmission and Distribution Grid: This component comprises two sub-components with the objective of strengthening the transmission and distribution network in the Shiselweni region of Eswatini. The sub-components include:

- a. *Sub-Component 1a – Reinforcement of the Southern Transmission Grid.* This will involve construction of transmission lines and two new substations, as well as expansion works at the existing Nhlangano II substation and the Hluthi switching station.
- b. *Sub-Component 1b – Reinforcement of the Distribution Network.* This aims to improve the reliability of the distribution network through linking the new substations to the distribution network, reinforcement of weak segments of the distribution network and install control equipment in key segments of the network.

Component 2 – Electricity Access Expansion. This will enable provision of financing to support an estimated 8,000 household connections to be installed through the Rural Electrification Program (REP). EEC’s Rural Electrification Unit will implement this component.

Component 3 – Analytical Support and Capacity Building. This component will finance technical assistance to the MNRE to improve electrification planning and implementation, monitoring, and verification capacity.

Component 4 – Contingent Emergency Response Component. This component will enable the provision of funding to support the GoKE response in the event of an eligible emergency with major adverse economic and/or social impacts.

1.2.1 Project Network



Figure 1 Transmission Line Route (Coastal & Environmental Services, 2022)

2. REGULATIONS AND REQUIREMENTS OF THE STAKEHOLDER ENGAGEMENT PLAN

2.1 Statute and Regulations

This SEP considers the existing institutional and regulatory framework within the context of the following Kingdom of Eswatini legal instruments:

- ✓ Environmental Management Act, 2002
- ✓ Electricity Act of 2007
- ✓ Environmental Audit, Assessment and Review Regulations, 2002
- ✓ Industrial Relations Act, 2000
- ✓ Employment Act 1980
- ✓ Occupational Health and Safety Act, 2001
- ✓ Factories, Machinery and Construction Works Act, 1972
- ✓ Workman's Compensation Act 7, 1983
- ✓ Sexual Offences and Domestic Violence Act, 2018
- ✓ Children's Protection and Welfare Act 6, 2012
- ✓ The Constitution of Eswatini, 2005

In addition to Kingdom of Eswatini legal instruments, the SEP also takes into account the following international guidelines and standards:

- ✓ World Bank Environmental and Social Framework (ESF) which provides a set of Environmental and Social Standards (ESS)
- ✓ WB Environmental, Health and Safety (EHS) General Guidelines (2007) and EHS Industry-Specific Guidelines for Electricity Transmission and Distribution (2007).

2.2 Scope of Stakeholder engagement

As highlighted above, stakeholder engagement within the project environment is guided by the Environmental and Social Standard- 10 and the Electricity Act of 2007, Environmental Management Act, 2002, and the Constitution of Eswatini which stipulate that a person shall not be deprived of land without the due process of the law and where a person is deprived, that person shall be entitled to prompt and adequate compensation for any improvement on that land or loss consequent upon that deprivation unless otherwise provided by law. The Electricity services act states that the Company (Article 54), must first secure the land for the servitude through a negotiated agreement with the landowners and may place any conduit above and below the ground across any land upon which no buildings have been constructed in consultation with the municipality, chiefdom, whichever is applicable.

2.3 Engagements Considerations

In consideration of risks that might hinder active engagement with stakeholders, the project has identified Covid-19 and political unrests to be the highest risk and therefore precautionary measures have to be put in place.

2.3.1 Covid-19 considerations

Covid-19 restrictions in Eswatini, alternative ways will be adopted to manage consultations and stakeholder engagement in accordance with the local laws, policies, WHO Health and Safety Guidelines and new social norms in effect to prevent virus transmission should there be need during implementation of the project. This means effective and meaningful consultations to meet project and stakeholder needs and adhere to the restrictions put in place by the government and international best practices to contain virus spread. The alternate approaches to be practiced for stakeholder engagement will include: having consultations in small groups as smaller meetings were now permitted while ensuring that distance and mask requirements are adhered to during the meeting, or else make reasonable efforts to conduct meetings through

2.3.2 Political unrest considerations

With unforeseen political unrests that erupt over the night, the project at this point try to keep informed stakeholders at project level and community level using different approaches. At project level, the expectation is that stakeholders at this level such as government ministries, departments, NGO:s etc have access to ICT solutions effective for communication hence meetings through online channels (e.g., Zoom, Skype, etc.) will be employed for their engagement. This aims to diversifying means of communication and relying more on social media, chat groups, online platforms, and mobile Apps (e.g., Facebook, Twitter, WhatsApp groups, project web links/websites, etc.) for meeting, workshops and or feedback lines of communication. For those in communities, CLO's shall be used to share any information needed until a time it is safe to engage on the ground. The above-mentioned approaches shall be reviewed and adjusted from time to time to stay in alignment with current country and company level regulations and or changes.

2.4 World Bank Requirements

Stakeholder engagement is a requirement for Investment Project Financing (IPF) supported by the World Bank. This SEP is designed to fulfil the project's requirements as stated in ESS-10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the NRAP. Specific objective of this SEP is to promote inclusiveness by crafting project level engagement plan (s) that will:

- Identify stakeholders and build and maintain a constructive relationship,
- Assess the level of stakeholder interest and support for the project,
- Promote and provide means for effective and inclusive engagement with project- affected parties,
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed.

3. OVERVIEW OF STAKEHOLDER ENGAGEMENT AND GUIDING PRINCIPLES

3.1 Stakeholder Engagement Overview

Constructive and meaningful stakeholder engagement processes must be free of manipulation, interference, coercion, and intimidation, and conducted on the principle of providing timely, relevant, understandable and accessible information, in a culturally appropriate format. It will involve interactions between identified groups of people and to provide stakeholders with an opportunity to raise their concerns and opinions (e.g. by way of meetings surveys, interviews and/or focus groups), and ensures that this information is taken into consideration when making project decisions.

3.1.1 Aim of Stakeholder engagement

An effective stakeholder engagement aims to develop a “social license” to operate and will depend on mutual trust, respect and transparent communication between EEC and its stakeholders. In turn, this shall improve decision-making and performance by:

- i. Managing costs - Effective engagement can help project EEC avoid costs, in terms of money and reputation.
- ii. Managing risk - Engagement helps project EEC and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- iii. Enhancing reputation - By publicly recognizing human rights and committing to environmental protection, EEC and financial institutions (World Bank) involved in financing the project can boost their credibility and minimise risks;
- iv. Avoiding conflict - Understanding current and potential issues such as land rights and proposed project activities;
- v. Improving corporate policy - Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in EEC corporate practices and policies;
- vi. Identifying, monitoring and reporting on impacts - Understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- vii. Managing stakeholder expectations - Consultation also provides the opportunity for EEC to become aware of and manage stakeholder attitudes and expectations.

3.2 Principles for Effective Stakeholder Engagement

Stakeholder engagement shall be informed by a set of principles defining core values underpinning interactions with stakeholders. Common principles based on International Best Practice include the following:

- 3.2.1 **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process;
- 3.2.2 **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- 3.2.3 **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized;

- 3.2.4 **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- 3.2.5 **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- 3.2.6 **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

3.3 The Guiding Objectives of Stakeholder Engagement

The stakeholder engagement objectives for the Project as informed by the ESS-10 Standard are as follows:

- a. To inform Interested and Affected Parties (I&APs) and key stakeholders of the proposed application and environmental studies;
- b. To initiate meaningful and timeous participation of I&APs;
- c. To identify issues and concerns of key stakeholders and I&APs with regards to the application for the development (i.e. focus on important issues);
- d. To promote transparency and an understanding of the project and its potential environmental (social and biophysical) impacts (both positive and negative);
- e. To provide information used for decision-making;
- f. To provide a structure for liaison and communication with I&APs and key stakeholders;
- g. To ensure inclusivity (the needs, interests and values of I&APs must be considered in the decision-making process);
- h. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance;
- i. To anticipate and avoid risks and impacts and where possible, minimize or reduce risks to acceptable levels;
- j. To focus on issues relevant to the project, and issues considered important by I&APs and key stakeholders; and
- k. To provide responses to I&AP queries.

3.4 Stakeholders Engagement Update

The overall motivation for updating the SEP is to disclose project engagements after every phase of the project. As a living document, the SEP shall be updated through Section 5 of the document using Table 3 (mainly under status column and the key issues/concerns column). All activities done to date are reflected in that section. Consequently, the updates shall report on project engagements undertaken during that project phase and those that are on-going according to project phases. Annexes section provides details of engagements including detailed minutes of meetings held, issues raised, responses given, agreed actions (if any) dates, reports generated based on engagements with stakeholders as well as meetings pictures.

This SEP is updated to reflect engagements that have occurred within Component 1 and 2 post disclosure of SEP in April 2019; Finalization of Designs, EISA/ESMP development and

disclosure, Resettlement Action Plan process, GBV Action plan activities including GRM process for GBV related issues of the NRAP while also mirroring activities to come within the Preconstruction Phase of the project for all Components, as well as Construction activities.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Identification of Stakeholders

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. In fulfilment of its requirement, the EEC, through the Project Implementation Unit (PIU), has identified all the stakeholders and intends to build and maintain a constructive relationship with them. As part of this process, it has been critical to identify vulnerable and disadvantaged groups such as women, children, people living with disabilities etc. This SEP has thus been used by the project to identify and will continue to identify stakeholder as: i) project-affected parties, ii) interested parties, and those who have the potential to influence project outcomes. Among those identified as relevant stakeholders includes project affected communities, NGOs, government agencies, academia, media, etc.

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

4.1.1 Project-affected parties

Project-affected parties under NRAP include households and communities that are likely to be impacted in the project area from Nhlangano town to Lavumisa- where component 1a activities of the project are to be implemented. The project has identified project-affected parties' interests and roles in the project's design, implementation, and decision-making processes. Project activities under this component are likely to result in clearance of vegetation, crops, and fences within the servitude for laying transmission line. Other project activities such as substations upgrading and construction are likely to affect communal land uses such as grazing and subsistence farming in the smallholder farms and may result in temporary restriction of access to homesteads, businesses, communal lands as well as social amenities and services. Direct social and economic impacts resulting from this component shall be addressed by Resettlement Action Plan (RAP) which has already been developed and disclosed as of October 2022 (attached in Annex C,no.2). Therefore, communication on the timing of works will be a crucial component of the project to minimize adverse impacts and keep Project Affected Persons (PAPs) informed. The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of the EEC. The direct responsibility of implementation is the responsibility of the project coordinator/manager, the PIU, and the project social specialists.

The project will also positively impact targeted beneficiaries, these include that the proposed project will strengthen the electricity network in the Shiselweni region by improving the reliability of service and increase access to electricity for domestic and productive uses, by:

- ✓ Reducing transmission system interruptions in the region.
- ✓ Reducing distribution system interruptions in the region.

- ✓ Increasing the number of households provided with electricity in the region.
- ✓ Reducing the high technical system losses that are inherent with low voltage transmission systems.
- ✓ People can open businesses and also make more opportunities with supply of electricity.
- ✓ Job opportunities during construction
- ✓ Compensations for those directly affected by the project to reduce negative impacts and improve living conditions where possible.

4.1.2 Other interested parties

These include individuals, groups, or organizations with an interest in the project. These groups of stakeholders may be interested on the NRAP for variety of reasons including concerns with its location, some of its characteristics, and its impacts, or other matters related to the broader public interest. Interested parties may include regulators, government officials, the private sector, the scientific community, academia, workers' unions, women's organizations, civil society organizations, and cultural groups.

The project has and will continue to identify other interested parties' interest and roles in the project's implementation, and decision-making process. The EEC, through the NRAP PIU and engaged Consultants, has undertaken preliminary stakeholder identification exercise and has developed a list of all the actors that may affect the project design and outcome. A total of 21 stakeholders have been identified (Table 1). The relationship between EEC and the identified stakeholders is currently encouraging and shall be nurtured continuously to create and maintain constructive engagements.

4.2 List of identified stakeholders and their role

Table 1 below shows the stakeholders identified to date and are listed according to their roles in the SEP.

Table 1: List of Stakeholders Identified

NO.	Stakeholder	Potential Role
<i>Government Ministries</i>		
1	Ministry of Natural Resources and Energy	<ul style="list-style-type: none"> ✓ Responsible for establishing the program implementing the access component. ✓ Perform quality assurance and approve payments for completed house connections
2	Ministry of Finance	<ul style="list-style-type: none"> ✓ Provide oversight and control of the disbursement of project funds to the implementing agency. ✓ Monitor compliance of the financial reporting of project funds by the implementing agency
3	Ministry of Economic Planning and Development	<ul style="list-style-type: none"> ✓ Responsible for managing capital projects for government departments and parastatals ✓ Manage organization. ✓ <u>Monitor project progress and reporting to World Bank.</u>
4	Ministry of Health	<ul style="list-style-type: none"> ✓ Public Health Section shall assist with educating project stakeholders on health issues such as prevention of HIV and the COVID-19 pandemic

		during project implementation.
5	Ministry of Tinkhundla Administration and Development	<ul style="list-style-type: none"> ✓ Responsible for Constituency centers (Tinkhundla) which are key to community development.
6	Deputy Prime Minister's Office	<ul style="list-style-type: none"> ✓ Gender Department and Family Issues to assist with policies regarding vulnerable people and educating stakeholders about the legislation for preventing occurrence of gender-based violence (GBV). ✓ Ensure compliance with international children treatment standards, provisions. ✓ Facilitates and monitors the implementation of effective policies and strategies that meet the needs of vulnerable groups. ✓ Assist with the coordination of interventions for Persons with Disabilities.
7	Ministry of Commerce, Industry and Trade	<ul style="list-style-type: none"> ✓ Responsible for the development of land for industrial use as well as the management of industrial sites
8	Ministry of Tourism and Environmental Affairs	<ul style="list-style-type: none"> ✓ Responsible for the management of environmental, heritage and cultural resources.
9	Ministry of Works and Transport	<ul style="list-style-type: none"> ✓ Responsible for the development of road infrastructure. The project will be in proximity to the MR11 road, whose maintenance responsibility falls under this ministry. ✓ Assist in verifying land acquisition procedures
10	Eswatini Royal Police Service	<ul style="list-style-type: none"> ✓ The Project can bring crime, violence and other criminal offences. The services of this stakeholder will be on a as needed basis. ✓ Their services will also be requested to be used by the affected local communities to report Gender Based Violence Incidents.
Government Agencies or Parastatal stakeholders.		
11	Eswatini Environmental Authority (EEA)	Have the overall oversight and responsibility of ensuring compliance to environmental and social regulations by all organizations, persons, companies whose actions and processes have a potential environmental and social impact. The Project will, from time to time, be required to obtain permits and authorization prior to implementation of certain components of the project. Furthermore, EEA will frequently carryout inspection of the project implementation process to ensure compliance to the environmental and social regulations.
12	Eswatini National Trust Commission (ENTC)	To be consulted on sensitive areas of nature conservation such as game reserves, heritage sites, etc. that the Project may affect.
13	Town Board of Nhlangano	The overriding institution in Nhlangano Town. The council governs private, commercial and government owned land in the town. The Project is expected to encroach and affect municipal land used for the provision of municipal services. The town council will from time to time be engaged to provide guidance and permission to use encroached land.
14	Eswatini Energy Regulatory Authority	Eswatini Energy Regulatory Authority is a statutory Energy Regulatory Body established through the Energy Regulatory Act,

		2007 (Act No.2 of 2007). The responsibilities include exercising control over the electricity supply industry and regulation of generation, transmission, distribution, supply, use, import and export of electricity in Eswatini. The Authority will provide information and guidance in resolving land disputes between parties affected by Project.	
<i>Regional and Community Level stakeholders</i>			
15	Chiefs and their council (Bandlancane) beNkhundla	Bucopho	<ul style="list-style-type: none"> ✓ Local community leaders acting as representatives of their local community. Meetings with traditional authorities will follow local practices and be held prior to any wider communication in local communities in order to respect the cultural and social structures. ✓ Be involved in and facilitate the resolution of community conflicts and land disputes at community level. ✓ Facilitate and monitor the implementation of the Project. ✓ Responsible for allocation of land in Swazi Nation land. In cases where there is need for land compensation for any loss of land, they are responsible for allocating
16	Regional Administrator		<ul style="list-style-type: none"> ✓ According to the laws of the country, Regional Administration (RA) is the second level of government after National Government, which makes the Shiselweni an important stakeholder. RA provides structures for national government to allocate resources in an efficient, effective and more equitable way to communities in the country. Throughout the project life-cycle, the Shiselweni Regional Administrator will be involved in the following when the need arises: ✓ Facilitate resolution of community conflicts and land disputes in the Chiefdoms <p>Facilitate and monitor the implementation of the Project</p>
<i>Affected and Interested parties</i>			
17	NGO's in the project area; NATICC, World Vision, CANGO, Redcross, ICAP, AHF, SWAAGA		<ul style="list-style-type: none"> ✓ Organization that are working in the same project area in issues such as GBV, HIV/AIDS, development projects, Health projects etc. hence they have to be engaged on possible assistance in some of the project activities such as GBV requirements, merging of efforts where target population is the same and so on.
18	EWSC ,		<ul style="list-style-type: none"> ✓ EWSC is implementing a project along the same project area hence not only should they be engaged on possible impacts but also create synergies.
19	ESWADE		<ul style="list-style-type: none"> ✓ ESWADE has a project constructing a Dam with the project network along that Dam line hence they need to be engaged to share drawings and agree on alternatives.
20	Beneficiaries		As direct beneficiaries of the development project, they have to be engaged through-out the life cycle for awareness, sensitization, feedback and opinions from them.
21	Project affected persons		As directly affected by project, they have to be engaged through-out the life cycle for information sharing, awareness, negotiation, compensation sensitization, feedback and opinions from them.

4.3 Stakeholders Analysis

A preliminary stakeholder analysis was conducted during the preparation phase NRAP. The analysis involved assessment of stakeholders' perception of the potential changes (negative and positive) to be brought about by project implementation. The stakeholders' analysis is a dynamic process that will be done on regular basis with the aim of tracking changes in the stakeholders' perceptions throughout the project cycle while also noting that their influence and interest may change according to the project phase. Table 2 below presents the stakeholders' analysis according to their interest, influence and other details.

The EEC, through its project unit, shall continuously classify stakeholders based on: i) their power to influence and their interest on the project, ii) the legitimacy of each stakeholder's relationship with the project, and iii) the urgency of the stakeholder's claim on the project activities, - potential risks and impacts. According to the preliminary stakeholder's analysis conducted, 21 stakeholders have been identified with potential interest and influence on the project. The table below shows the outcome of the analysis.

NO.	Stakeholder	Interest	Influence
1	Ministry of Natural Resources and Energy	High	High
2	Ministry of Finance	High	High
3	Ministry of Economic Planning and Development	High	Low
4	Ministry of Health	High	Low
5	Ministry of Tinkhundla Administration and Development	High	High
6	Deputy Prime Minister's Office	High	High
7	Ministry of Commerce, Industry and Trade	High	Low
8	Ministry of Tourism and Environmental Affairs	High	Low
9	Ministry of Works and Transport	High	High
10	Eswatini Royal Police Service	High	Low
11	Eswatini Environmental Authority (EEA)	High	High
12	Eswatini National Trust Commission (ENTC)	High	High
13	Town Board of Nhlangano	High	Low

14	Eswatini Energy Regulatory Authority	High	High
15	Chiefs and their council (Bandlancane), Bucopho beNkhundla	High	Low
16	Regional Administrator	High	High
17	NGO's in the project area; NATICC, World Vision, CANGO, Redcross, ICAP, AHF, SWAAGA	High	Low
19	EWSC	High	Low
19	ESWADE	High	Low
20	Beneficiaries - Mampondweni, Ngwenyameni, Zikhetheni, Hohhoho, Emuva, Mabonabulaweh, Manyiseni, Kwaluseni, Mchinsweni, Nkonka, Maplotini and Vimbizibuko	High	High
21	Project affected persons	High	High

Table 2:Stakeholder analysed according to influence and interest in the project

The objective of the stakeholders ‘analysis was to determine each stakeholder’s interest and its ability to influence NRAP design and its implementation. The purpose of the analysis and preliminary engagement is to determine and source the opinions of the most powerful stakeholders to help define the project at its preliminary stage. It is also to build an understanding of the stakeholders early on and to ensure they fully grasp and understand NRAP.

4.4 Stakeholder Engagement plan

The goal of the project’s Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project- affected and interested parties throughout the project life cycle on issues that could potentially affect their livelihoods and properties as well as their interests as discussed in above sections.

While advancing effective, inclusive and, meaningful engagement with project- affected and interested parties, the EEC, through PIU, shall conduct consultations that will ensure two-way communication processes.

The objective of the engagement and consultations plan under the project is to:

- (a) Begin early in the project planning process to gather initial views on the project proposal and inform project design;
- (b) Encourage stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- (c) Ensure that stakeholders understand how the project is likely to affect them;

- (d) Ensure consistency in messaging;
- (e) Continue engagement on an ongoing basis as risks and impacts arise and manage stakeholders' expectations;
- (f) Ensure prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
- (g) Consider and responds to feedback;
- (h) Support active and inclusive engagement with project-affected parties;
- (i) Ensure that consultation(s) is/ are free of external manipulation, interference, coercion, discrimination, and intimidation; and
- (j) Ensure consultation (s) is/are documented and disclosed by the NRAP.

Informed by the stakeholder's analysis above, the proposed stakeholder engagement plan would be as follows:

 *Engaging high interest and high influence stakeholders:* the plan is to fully engage this group and apply all effort to ensure that they are satisfied and fully informed of the project at all times. This will be done by: i) focusing efforts on these groups of stakeholders throughout the project cycle; ii) involving most influential stakeholder (s) in NRAP governance decision making bodies and, iii) engaging them and consulting them regularly. Annual, bi-annual, and quarterly engagement plan. Targeting these groups of stakeholders shall be incorporated into the NRAP annual work plan.

Engaging high interest and low influence: the plan is to keep this group informed, ensuring that no major issues arise because of the Project. The Project will maintain this group's interest, particularly in component 1a. This will be done by: i) involving this group of stakeholders in the implementation arrangement of component 1a of the Project, ii) taping into their interest and use them as a goodwill ambassador while advancing component 1a works in the respective influence areas, iii) keeping them in the loop on decision that will influence component 1a and 2 design and implementation.

5. STAKEHOLDER ENGAGEMENT PROCEDURE

Stakeholder engagement is an essential tool towards facilitating involvement in decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner. The project has engaged stakeholders since planning and project appraisal and now it is at implementation stage which requires an updated plan for engaging stakeholders according to project phase and Environmental and Social Standards requirements. This section shall therefore be used to reflect all engagements done within the project and updates of engagements also reflected herein with Annexes to support the engagement activities described in the section.

5.1 Objective

According to the Stakeholder Engagement and Information Disclosure (ESS10), stakeholder engagement plans are a useful tool for managing communications between EEC and its stakeholders throughout the project lifecycle. The main objective of this procedure is to reflect planned and on-going engagements of the project post project planning and appraisal phase which is implementation phase. The implementation phase includes pre-construction and construction phase.

5.2 Scope

The planning phase of the project triggered ESS1 and ESS10 which was applied in the engagements process. However, the activities of pre-construction and construction phase also make ESS 2, 4 and 5 also applicable in those stakeholders who have to be engaged on activities that affect or impact on them for instance land acquisition, construction works etc. Consequently, this plan/procedure reflects engagements planned and on-going for pre-construction and construction for Component 1a and Component 2. Additionally, the SEP of the project states that the SEP is a living document and shall be updated as and when necessary, throughout the project cycle. The plan shall further be updated and disclosed before construction activities commence to reflect all engagements that have been done including on-going engagements. The Outcome column shall be used to update engagements that have been done with associated evidence attached in annexes.

Table 3 below provides the planned engagements under NRAP and the status of each engagement

Stakeholder	Purpose of Engagement	Objective	Proposed timelines	Status	Outcome
Government parastatals/agencies Local/ traditional communities Vulnerable groups	• Preliminary engagements and stakeholder identification process <i>NRAP Stakeholder Engagement Plan, December 2022</i>	• To gain preliminary understanding of the scope of the project, appropriated and legislated engagement requirements and relevant stakeholders.	07-16 July 2020 (Refer to Annexure for meeting minutes)	Done	<ul style="list-style-type: none"> Project re-introductory meetings conducted in all the 13 affected Chiefs and their inner counsel and the ESIA and RAP process activities. Key stakeholders such as women, youth and potentially vulnerable groups identified for subsequent Focus Group Discussion (FGDs) sessions to be conducted for both ESIA and RAP process. Potential Enumerators for the RAP survey identified
• Government • Government parastatals/agencies • Local/ traditional communities • Vulnerable groups	• Scoping engagements	<ul style="list-style-type: none"> To generate feedback on the proposed study methodology, include the scope, approach and key issues to be investigated further in the ESIA. Train affected communities on project communication and the GRM. To meet key stakeholders and introduce them to Project and ESIA process. To disclose the project in the public domain to all interested and affected stakeholders 	Early- Mid August 2020	Done	<ul style="list-style-type: none"> Initial feedback from affected communities and persons secured. Project BID disseminated and communities trained on project communication and Grievance Redress Mechanism process. Affected communities, government ministries and parastatals and traditional leadership engaged.

		<ul style="list-style-type: none"> • To gather issues of concern and through this identify a list of potential impacts 			<ul style="list-style-type: none"> • Purpose of valuation explained to all affected landowners. • Asset inventory and cut-off date explained to affected PAPs.
<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Traditional leadership and their communities • Non-Governmental Organizations 	<ul style="list-style-type: none"> • ESIA Disclosure 	<ul style="list-style-type: none"> • To discuss the identified impacts and their mitigation measures with stakeholders allowing for their inputs and, • To provide stakeholders with the opportunity to comment on the Draft ESIA. • Involvement of stakeholders in identifying in assessing the appropriateness of the proposed mitigation measures. • Allow to comment on the draft ESIA • Disseminate draft ESIA report to all stakeholders. • Gathering and addressing stakeholder concerns on the impacts identified. 	October 2020	Done	<ul style="list-style-type: none"> • Draft ESIA findings shared with all key stakeholder • Key stakeholders' comments and concerns on the draft ESIA addressed. • Inputs on required line adjustments recommendations secured from directly affected stakeholders
Component 2 Contractor workers	<ul style="list-style-type: none"> • Continuous engagement to induct new employees on the NRAP and environmental & social safeguards 	<ul style="list-style-type: none"> • To promote safety and health at work through the provision of accessible means to raise workplace social, environmental, safety and health concerns (ESS 2, ESF page 31) 	December 2021- October 2024 The induction of new employees has been done from time to time. A total number 354 new employees have been inducted from January 2022 to date. First round of induction	On-going	<ul style="list-style-type: none"> • Contractor employees are aware of the project, expectations as well as environmental and social considerations.

			was held in the Shiselweni Region.		
Component 2 contractor workers	<ul style="list-style-type: none"> Continuous engagement to monitor compliance with legal and other requirements, such as environmental, social, health & safety management through site inspections and audits 	<ul style="list-style-type: none"> To ensure that appropriate information on environmental and social risks and impacts is continuously disclosed to stakeholders to improve compliance on environmental, social, safety and health safeguards (ESS 10, ESF page 97). 	February 2022- October 2022 Two types of inspections have continuously been conducted. Pre accommodation stay and during stay. Inspection was done with all contractor workers	Done	<ul style="list-style-type: none"> Inspections have played a huge role in identifying deviations and non-conformances. Reports were issued out to Contractors, and each expected to underpin root-causes, corrective and preventive actions.
Local/traditional	<ul style="list-style-type: none"> These are engaged before project implementation to sensitize them on project requirements, expectations, potential environmental, safety and social risks and mitigation measures 	<ul style="list-style-type: none"> To support the development of constructive relationships that are important for the management of the project's environmental and social risks (ESS 10, ESF page 98) 	February 2022 – October 2024 (Traditional Leaderships are continuously engaged on issues on issues pertaining to the project Resettlement Action Plan, component 1a contractors as well as component 1b and 2).	On-going	<ul style="list-style-type: none"> Rural communities are aware of the project, expectations as well as environmental and social considerations due to previous engagements.
Eswatini Environment Authority (EEA)	<ul style="list-style-type: none"> For the facilitation of the public participation process for IEE/CMP reports and issuing of project approval letter. 	<ul style="list-style-type: none"> To utilize national environmental and social institutions, systems, laws regulations and procedures in the implementation of projects (ESF, ESS1, page 16). 	March 2022- May 2022	Awaiting response	
Component 2 SHE Reps	<ul style="list-style-type: none"> Environmental safeguards Social safeguards Safety safeguards 	<ul style="list-style-type: none"> To provide contractor workers with accessible means to raise 	11 May 2022	Done	<ul style="list-style-type: none"> SHE Reps reminded of all requirements expected for

	<ul style="list-style-type: none"> Feedback, comments, recommendations, and issues from SHE reps 	workplace concerns (ESF, page 31).			<ul style="list-style-type: none"> compliance by Contractors. SHE reps are well aware of what is expected of them however they are faced with challenges in executing their duties efficiently. SHE reps expressed their grievances which contribute to non-compliance by contractors, which includes contractor directors do not understand the roles and responsibilities hence they are not allowed to make recommendations on compliance issues. EEC noted all concerns which are to be discussed extensively at PIU level, with relevant Contractors and EEC leadership.
Component 2 Contractor Directors	<ul style="list-style-type: none"> Project update Discuss concerns/grievances written via letter to the EEC from the contractor directors Resolve/address grievances and concerns 	<ul style="list-style-type: none"> To address and respond to contractors' grievances (ESF, page 98) 	16 May 2022	Done	
ESWADE (Component 1a)	<ul style="list-style-type: none"> Project brief ESWADE Project design impact on the project Sharing of project drawings 	<ul style="list-style-type: none"> Project information disclosure to allow stakeholders to understand the risks and impacts of the project on their own project going own in 	30 May 2022	TBA	

		communities (ESS 10, page 99).			
Component 1a communities Groups	<ul style="list-style-type: none"> Update on project implementation 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	June 2022	TBA	
Traditional Leadership (Component 1a and 2) (Scheme chairpersons, Indvuna yenkhundla, Bucopho, Umphakatsi)	<ul style="list-style-type: none"> Introduction of new RAP Consultant Introduction of Land Valuators Discussion on the commencement date of construction and role to be played by the leadership during works. 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	June 2022	Done	
PAP,s TDL under Component 1a	<ul style="list-style-type: none"> Update on project implementation Engagement on assets inventory exercise 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	June 2022 (Through phone calls, emails and letters.)	Done	<ul style="list-style-type: none"> Affected TDL aware of the stage of the project Aware and ready for asset inventory Question and concerns about the project addressed.
Component 1a communities (Traditional leadership, RAP consultant- Marco Da Cunha), CLOs, Group Scheme Chairpersons, PIU)	<ul style="list-style-type: none"> Introduction of new RAP Consultant Discussion on role of new RAP Consultant RAP Disclosure 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	October 2022 (Refer to attached meeting minutes and registers)	Done	<ul style="list-style-type: none"> RAP disclosed to all affected community's leadership Affected people's concerns and questions on RAP gathered and addressed
Component 1a Communities	<ul style="list-style-type: none"> Project brief Conduct GBV/SEA/SH awareness refresher sessions in partnership with Eswatini Water Services Corporation (EWSC) 	<ul style="list-style-type: none"> To ensure that communities are retrained on GBV risks. Bring HIV testing services closer to communities and provide opportunities for 	August – October 2022	Done	<ul style="list-style-type: none"> Community members aware of GBV risks and expectation on their conduct during line construction.

	<ul style="list-style-type: none"> • HIV/STIs Mobile clinic services • Women and young girls only GBV awareness sessions • GRM awareness sessions • Community and contractor conduct during works 	<ul style="list-style-type: none"> • testing for HIV to affected communities. • To ensure that appropriate information on environmental and social risks and impacts is continuously disclosed to stakeholders to improve compliance on environmental, social, safety and health safeguards (ESS 10, ESF page 97). 			<ul style="list-style-type: none"> • More GBV cases reported to NATICC • Women aware of their rights and GBV GRM process • More people tested for HIV/STI and related diseases.
Component 1b & 2 communities	<ul style="list-style-type: none"> • Project Brief • Conduct GBV/SEA/SH awareness sessions in partnership in communities where contractor workers are accommodated and work. • HIV/STIs Mobile clinic services • Women and young girls only GBV awareness sessions • GRM awareness sessions • Community and contractor conduct during works • 	<ul style="list-style-type: none"> • To ensure that communities are retrained on GBV risks. • Bring HIV testing services closer to communities and provide opportunities for testing for HIV to affected communities. • To ensure that appropriate information on environmental and social risks and impacts is continuously disclosed to stakeholders to improve compliance on environmental, social, safety and health safeguards (ESS 10, ESF page 97). 	August – October 2022	Done	<ul style="list-style-type: none"> • Community members aware of GBV risks and expectation on their conduct during line construction. • More GBV cases reported to NATICC • Women aware of their rights and GBV GRM process • More people tested for HIV/STI and related diseases.
Submission of Final ESIA to WB	<ul style="list-style-type: none"> • Formal Submission of Final ESIA to WB 	<ul style="list-style-type: none"> • Incorporation of final ESIA comments from the WB and final submission of the report. 	August 2022	Done	<ul style="list-style-type: none"> • Document approved by the WB and associated national approvals (EEA) • Document disclosed on EEC website and WB website
Shiselweni Regional Administrator	<ul style="list-style-type: none"> • Project update • Discussion of RAP and commencement of payouts • RA to assist in resolving any community conflicts and land 	<ul style="list-style-type: none"> • To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	November 2022	On-going	

	disputes in the Chiefdoms that may arise due to RAP implementation				
Traditional Leadership (Component 1a and 2) (Scheme chairpersons, Indvuna yenkhundla, Bucopho, Umphakatsi)	<ul style="list-style-type: none"> Introduction of property and land valuator (phase 2) 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	Meeting held at Eswatini Water Services Corporation Auditorium on 10 June 2022. (Refer to attached minutes and registers)	Done	<ul style="list-style-type: none"> All affected communities aware and ready for the asset inventory exercise. Concerns and comments about assets inventory addressed
PAP,s TDL under Component 1a	<ul style="list-style-type: none"> Discuss Project affected meaning 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	Held community meetings between April – July 2022 (Refer to meeting minutes and registers attached)	Done	<ul style="list-style-type: none"> Project information of E & S risks and impacts disclosed. PAPs and community members concerns about the project addressed. Communities updated on the project
PAP's in SNL under Component 1a	<ul style="list-style-type: none"> Discuss Project affected meaning 	To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10.	Held community meetings between April – July 2022 (Refer to meeting minutes and registers attached)	Done	<ul style="list-style-type: none"> Project information of E & S risks and impacts disclosed. PAPs and community members' concerns about the project addressed. Communities updated on the project
PAP,s TDL under Component 1a	<ul style="list-style-type: none"> Valuation of Land/Assets Discuss compensation eligibility Discuss compensation GRM 	<ul style="list-style-type: none"> To ensure that compensation standards for categories of land and fixed assets is disclosed and applied consistently (ESF, page 56, ESS 5 requirements). 	April – July 2022 (Refer to meeting minutes and registers attached)	Done	<ul style="list-style-type: none"> Project information of E & S risks and impacts disclosed. PAPs and community members' concerns about the project addressed. Communities updated on the project

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PAP,s SNL under Component 1a	<ul style="list-style-type: none"> Discuss compensation eligibility Discuss compensation GRM Compensation agreement certificate signing Pay-outs 	<ul style="list-style-type: none"> To ensure that compensation standards for categories of land and fixed assets is disclosed and applied consistently (ESF, page 56, ESS 5 requirements). 	May – July 2022 (Refer to meeting minutes and registers attached)	Done	<ul style="list-style-type: none"> Project information of E & S risks and impacts disclosed. PAPs and community members' concerns about the project addressed. Communities updated on the project
<ul style="list-style-type: none"> Public – Eswatini Broadcasting Information Services (EBIS) and the Voice of the Church (VOC) TDL & SNL PAPs 	<ul style="list-style-type: none"> Resettlement Action Plan process Discuss compensation eligibility Discuss compensation GRM 	<ul style="list-style-type: none"> To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	July 2022	Done	<ul style="list-style-type: none"> Project information of E & S risks and impacts disclosed. PAPs and community members' concerns about the project addressed. Communities updated on the project
PAP,s TDL under Component 1a	<ul style="list-style-type: none"> Discuss valuation reports Compensation agreement certificate discussion and signing Pay-outs and site hand over On-going engagement as an affected person 	<ul style="list-style-type: none"> To ensure that compensation standards for categories of land and fixed assets is disclosed and applied consistently (ESF, page 56, ESS 5 requirements). 	October – December 2022	On-going	<ul style="list-style-type: none"> Project information on E & S risks and impacts disclosed. PAPs and community members' concerns about the project addressed. Communities updated on the project
<ul style="list-style-type: none"> PAPs Other Project affected communities Vulnerable Groups Traditional Leadership Regional Administration office 	<ul style="list-style-type: none"> Resettlement Action Plan (RAP) disclosure and Stakeholder consultation 	<ul style="list-style-type: none"> Copies of the final RAP disclosed to all government ministries and placed at all tinkhundla centres and the Regional Administrator's office. RAP summary posters translated from English to Siswati posted at all tinkhundla centres. 	October – December 2022	On-going	<ul style="list-style-type: none"> RAP disclosed on EEC and World Bank website Public disclosure of land and assets records compiled during the survey. Validation of land and assets with individual PAPs on a needs basis.

		<ul style="list-style-type: none"> • RAP disclosed through the translated summary to both TDL and SNL PAPs. • Compensation agreement disclosure to all PAPs through community and family level meetings facilitated by SSDs and Community Liaison Officers. • Home visits to vulnerable PAPs to disclose final RAP and Compensation agreements translated to Siswati to ensure effected disclosure of RAP to illiterate people. • Dissemination of final RAP to all stakeholders. • Use of Leaflets on non-technical summary of RAP for PAPs. 			<ul style="list-style-type: none"> • Disclosure of compensation schedules to PAPs and acknowledgement of receipt- any differences in opinion on the asset inventory or compensation value is identified at this stage:
Town Board of Nhlangano, Hluthi and Lavumisa	<ul style="list-style-type: none"> • Project update • Inform the Board on the commencement dates of Component 1a civil works which will impact encroached land. 	<ul style="list-style-type: none"> • To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	December 2022	TBA	
Eswatini Royal Police Service	<ul style="list-style-type: none"> • Project update • Request to be visible around project area under Component 1a during beginning of works to ensure safety of foreign workers • Request active turnaround times in reported cases such as theft, damages to property on site, assault etc. 	<ul style="list-style-type: none"> • To ensure that project information on E & S risks and impacts is disclosed in a continuous manner according to project requirements outlined under ESS10. 	December 2022	TBA	
Component 1a contractor employees	<ul style="list-style-type: none"> • Continuous engagement to monitor compliance with legal and other requirements, such as environmental, social, health & 	<ul style="list-style-type: none"> • To ensure that appropriate information on environmental and social risks and impacts is continuously disclosed to 	December 2022-October 2024	TBA	

	safety management through inspections and audits	stakeholders to improve compliance on environmental, social, safety and health safeguards (ESS 10, ESF page 97).			
Eswatini Environmental Authority (EEA)	• EEA to carryout inspection of the project implementation process to ensure compliance to the environmental and social regulations	• To utilize national environmental and social institutions, systems, laws regulations and procedures in the implementation of projects (ESF, ESS1, page 16).	September 2022-October 2024	TBA	
	• EEA to review and verify project compliance reports from EEC	• To utilize national environmental and social institutions, systems, laws regulations and procedures in the implementation of projects (ESF, ESS1, page 16).	September 2022-Post Construction	TBA	
PAP,s SNL under Component 1a	• Site clearance and handover	• To ensure that compensation standards for categories of land and fixed assets is disclosed and applied consistently (ESF, page 56, ESS 5 requirements).	February to April 2023	TBA	

Table 3: NRAP Stakeholder engagement procedure and update

6. INFORMATION DISCLOSURE

6.1 Objective in Information Disclosure

The objective of the information disclosure plan is to ensure that appropriate project information, particularly activities related to component 1a and 2 on environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. The World Bank standards require that the SEP be disclose after each updating process. The last update of the Project's SEP was done in April 2019 and it was disclosed in both the EEC and World Bank websites. Other important documents that have since been disclosed in EEC and World Bank websites include the Resettlement Action Plan as of September 2022, final ESIA/ESMP as of August 2022, Labor Management Plan in 2022, NRAP Occupational And Community Health And Safety Implementation Plan, ESMF, ESCP, RPF in 2019 respectively.

The EEC, through NRAP PIU, shall disclose project information to project-affected and other interested stakeholder mapped during stakeholder's identification exercise. Potential risks. impacts and benefits expected from components 1a and 2 of the project and potential opportunities that may emerge shall be explained and discussed during consultation (s).

Moreover, the EEC, through NRAP PIU, shall ensure that stakeholders are provided with access to the information listed in a timeframe that enables meaningful consultations with them on project including:

- (a) The purpose, nature and scale of the Project, particularly activities associated with component 1a and 2;
- (b) The duration of proposed project activities;
- (c) Potential risks and impacts of the project on local communities, and the proposals for mitigating potential impacts,
- (d) Highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize impacts;
- (e) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
- (f) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported;
- (g) The process and means by which grievances can be raised and will be addressed.

6.2 Guiding Principles of Disclosure

The disclosure and consultations activities will be informed by the following guiding principles:

- ✓ Consultations must be widely publicized particularly among the project affected stakeholders/communities, preferably 2 weeks prior to any meeting engagements;
- ✓ Allow non-technical information summary to be accessible prior to any event to ensure that people are informed of the assessment and conclusions before scheduled meetings;

- ✓ Location and timing of meetings must be designed to maximize stakeholder participation and availability;
- ✓ Information presented must be clear, and non-technical, and presented in both local language and mannerism;
- ✓ Facilitate in a way that allow stakeholders to raise their views and concerns;
- ✓ Issues raised must be answered, at the meeting or later.

6.3 Stakeholder Engagement Techniques

The project shall be responsive to requests for information from project-affected parties and other interested parties throughout the project cycle.

The ECC, through the PIU, shall make special efforts to inform, engage with, and understand disadvantaged or vulnerable groups with regard to risks and impacts associated with component 1a and 2 activities and the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances. Moreover, the Company shall solicit collaboration with local organizations working with disadvantaged and vulnerable people. These include World Vision, the Deputy Prime Minister's Office and others (as listed in stakeholder list). These organizations shall assist EEC with strategies of incorporating the views of the disadvantaged and vulnerable people.

Table below presents techniques that shall be utilized to the stakeholder engagement process.

Table 4: Stakeholder Engagement Communication Plan

Stakeholder	Communication	Method of Engagement
Ministry of Natural Resources and Energy	<ul style="list-style-type: none"> • Project Concept Note Preparation • Field Missions • Project Approval and Contracting 	<ul style="list-style-type: none"> • Formal meetings • Email • Reports • Phone calls • Letters
Ministry of Finance	<ul style="list-style-type: none"> • Project Concept Note Preparation • Field Missions • Project Approval and Contracting • Record discussions 	<ul style="list-style-type: none"> • Formal meetings • Email • Reports • Phone calls • Letters/Memo
Ministry of Economic Planning and Development	<ul style="list-style-type: none"> • Project Concept Note Preparation • Field Missions • Project Approval and Contracting • Record discussions 	<ul style="list-style-type: none"> • Formal meetings • Email • Reports • Phone calls
Ministry of Commerce	<ul style="list-style-type: none"> • Discussion on future plans of commercial and industrial Development • Implementation steering committee progress reports • Record discussions 	<ul style="list-style-type: none"> • Formal meetings • Email

Ministry of Health	<ul style="list-style-type: none"> • Project brief • Discussion with the related department on issues of health relevant to the project. • Record discussions 	<ul style="list-style-type: none"> • Formal meetings • Letters • Email • Phone calls
Ministry of Tinkhundla Administration and Development	<ul style="list-style-type: none"> • Project Concept Note Preparation • Field Missions • Progress reports • Record discussions 	<ul style="list-style-type: none"> • Formal meetings • Email • Phone calls • Letters
Deputy Prime Minister's Office	<ul style="list-style-type: none"> • Project brief • Disseminate technical information • Record discussions 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email • Phone calls
Ministry of Tourism and Environmental Affairs	<ul style="list-style-type: none"> • Project brief • Disseminate technical information • Record discussions 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email
Ministry Works and Transport	<ul style="list-style-type: none"> • Project brief • Allow group to comment – opinions and views • Build impersonal relation with high level stakeholders • Site visits 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email • Phone calls • Site visits
Eswatini Environmental Authority (EEA)	<ul style="list-style-type: none"> • Project Brief and request for categorization • Site visits • Periodic compliance reports 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email • Reports • Phone calls • BID
Town Councils of Nhlangano, Hluthi, and Lavumisa	<ul style="list-style-type: none"> • Project Brief and discussion of council procedures for servitude acquisition • Compliance and Monitoring meetings 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email • Workshops
Regional Administrator	<ul style="list-style-type: none"> • Preliminary Meeting • Present information on the Project • Induction and trainings on the Project • Allow group to comment – opinions and views • Build impersonal relation with high level stakeholders • Resettlement engagement Meetings (Refer to RPF and RAP) 	<ul style="list-style-type: none"> • Letters • Formal meetings • Email • Reports • Phone calls • BID • Workshops/trainings

Eswatini Royal Police Service	<ul style="list-style-type: none"> Distribute non-technical information Facilitate meetings with presentations and PowerPoint Allow the group to provide their views and opinions especially in issues of the keeping order during project in cases where there are disputes 	<ul style="list-style-type: none"> Letters Formal meetings Email Phone call
Eswatini National Trust Commission (ENTC)	<ul style="list-style-type: none"> Present information on the Project Allow group to comment – opinions and views 	<ul style="list-style-type: none"> Letters Formal meetings Email Reports Phone call
Eswatini Tourism Authority	<ul style="list-style-type: none"> Build impersonal relation with high level stakeholders Site visits where necessary 	<ul style="list-style-type: none"> Letters Formal meetings Email Phone call
Local/Traditional Community Leadership	<ul style="list-style-type: none"> Preliminary Meeting Present information on the Project to the community Leaders Induction and trainings on Project Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Resettlement engagement Meetings (Refer to RPF and RAP) Site visits 	<ul style="list-style-type: none"> Press Statements/Advertisements BID Letters Formal meetings Phone call
Local/Affected/Benefitting Communities	<ul style="list-style-type: none"> Present Project information to a large group of stakeholders, especially affected community members Allow the group to provide their views and opinions Build relationship with the communities, 	<ul style="list-style-type: none"> Sensitisation meetings, BID's and Posters throughout the affected communities FGD/KII Public meetings Workshops Site visits Trainings CLO's

	<ul style="list-style-type: none"> especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Resettlement engagement Meetings 	
Coordinating Assembly for NGO's Organisations on labour rights	<ul style="list-style-type: none"> Distribute non-technical information Facilitate meetings with presentations and PowerPoint Allow the group to provide their views and opinions Request guidance on how to handle issues related to their target groups as NGOs especially the vulnerable parties likely to be affected 	<ul style="list-style-type: none"> Formal meetings Email FGD/KII BID/Posters Press Statements/Advertisements

Focused efforts will be made to engage with directly relevant stakeholders, including vulnerable groups at the local level. Affected individuals will be consulted directly and via their representatives, and other influential people within communities. In addition, special efforts will be made to meet with representatives of potentially vulnerable groups who may not be reached through established structures.

All meetings will follow local practices and norms. Meetings with the local administration and with traditional leaders will be held prior to any wider communication in the communities in order to respect traditional structures. All affected communities and groups will be made aware of the Project feedback and grievance mechanism.

6.4 Avenues for Information Disclosure

There are various avenues that will be employed in the stakeholder engagement process and should be used for information disclosure:

i. *Community Forums:* To facilitate effective consultation with the communities during implementation of the project, the Social standards team, shall establish community forums

through local established Traditional leadership or authority to disseminate project information to community members. Chiefdoms through Chief's Royal kraals shall also be used.

ii. *Local Government*: Government representatives, District/Town Officers as development agents

iii. *Tinkhundla Centers*: as a channel to disseminate information on the project.

iv. *Information Boards*: Notice boards are effective mechanisms to inform the communities and wider audiences about the project. These can be installed on specific areas of impact among the communities. These will include notices in shops in local communities.

v. *The Media*: Newspapers commonly read in the project area will be used to notify the public.

6.5 Stakeholder Engagement Within Project Lifecycle

The process of updating this SEP shall be guided by the project phases and the stakeholders that need to be engaged through all the phases of the project. In all the project phases, the focus and scope of the SEP will be updated to ensure that the NRAP addresses external changes and adheres to its strategy.

The key life-cycle of the project phases to be considered when implementing stakeholder engagement are portrayed in the Figure below and they include Planning (design), Pre-construction, Construction and Commissioning.

6.5.1 Planning / Design (Pre-construction)

This is the process of ensuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements. It involves clearly setting out objectives and activities of the project. Key Activities that shall need engagement of stakeholders include:

- Identify key stakeholders
- Stakeholder analysis
- Inform Interested and Affected Parties
- Update of the existing environmental and social assessment (EISA) (disclosed in August 2022)
- Resettlement Action Plan (RAP)
- Project background information and disclosure
- Detailed Engineering Design
- Rural electrification process
- Operationalization of GRM (active system)

6.5.2 Implementation (Construction)

This is the process of undertaking activities as planned from the design or planning phase of a project cycle. It involves turning inputs into outputs towards the realizing of project goals (impact level). Key Activities that will need engagement of stakeholders include:

- Ensure that Construction Contractor(s) develop, implement and maintain the following instruments; Traffic management Plan, C-ESMP, Health and Safety management Plan, Labour Management Plan, Emergency Response Plan and OHS Plan with GBV action Plan;

- Community Awareness on project risks through meetings and training; such as GBV awareness sessions, inductions, safety and environmental risks and protection awareness sessions etc.
- Land acquisition process including dealing with compensation grievances
- Construction of transmission lines and two new substations, as well as expansion works at the existing Nhlangano II substation and the Hluthi switching station.
- Reinforcement of the Distribution Network
- Electricity Access Expansion construction activities
- Full operationalization of GRM (active system);

6.5.3 Commissioning (Post-construction)

Stakeholder engagement within the project preparation and implementation process is critical for supporting the project's risk management process, specifically the early identification and avoidance/management of potential impacts (negative and positive) and cost-effective project design. Key Activities that will need engagement of stakeholders within this phase of the project include:

- Removal of temporary structures;
- Rehabilitation of exposed areas;
- Landscaping;
- Shutdowns and
- Continue operationalization of GRM.

The following phases will be used to guide stakeholder engagement within NRAP:

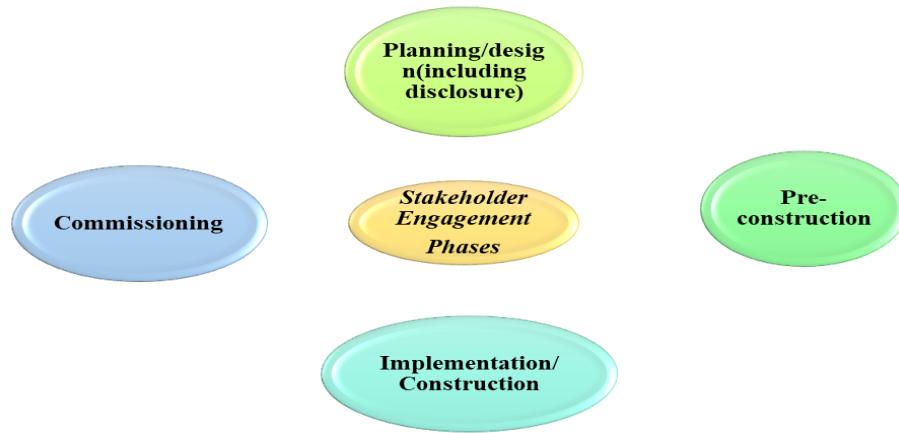


Figure 2:NRAP stakeholder engagement phases/cycles

The different phases/cycles of the project which are **Planning/design** (including disclosure), **Pre-construction**, **Construction** and **Commissioning** which shall guide Stakeholder engagement within the project cycle. At each and every stage of the different phases, specific stakeholders will be targeted at a time. This means that at each phase, activities to be undertaken will determine which stakeholders are engaged at that phase. All components of the project fit within the 4 phases

of the project. The detailed of which stakeholder is to be engaged at which phase is detailed in *section 5* above.

7. RESPONSIBILITIES AND RESOURCES

7.1 Roles and Responsibilities of Project Unit

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function at EEC are described. The management, coordination and implementation of the SEP and its integral tasks is the responsibility of dedicated team members within EEC PIU, EEC supporting staff, its regional offices and local sub-contractors. The roles and responsibilities of the organization are presented below.

7.1.1. Project Implementation Unit (PIU)

The PIU is responsible for the preparation and physical implementation of the project. This unit will be under the oversight of the General Manager, Research and Development, comprising the following staff: Project Manager, Procurement Officer, Transmission and Substations Engineer, Safety Officer, 2 Social Standards Officers and an Environmental Officer.

Position	Role	Responsibility
Project Manager	Manage the PIU	<ul style="list-style-type: none"> Oversees implementation of the project to ensure its completion within the allocated project timelines
Project Engineer	Manage the overall implementation of the Project	<ul style="list-style-type: none"> Manage and lead the Project Implementation Team and the Project Implementation Unit (Sub Coordinators) Coordinate and supervise the implementation of the project to ensure timely completion of deliverables, within budget and the required quality Manage and supervise the work of consultants and contractors Ensure relevant stakeholders are engaged at all phases of the project Oversee the commissioning of the project
Procurement Officer	Manage the overall procurement of goods, services under the project and assist in contract management	<ul style="list-style-type: none"> Timely preparation and updating of procurement plans Monitoring and control of procurement processes Management of contracts and procurement reporting Work with the Environment and Social Development Officers to ensure that all the Procurement documents adequately reflect environmental and social requirements. Compliance with internal, Government of the Kingdom of Eswatini (GoKE) and World Bank control systems and procurement rules, policies, guidelines, regulations etc

Environmental Officer	<ul style="list-style-type: none"> • Monitor implementation of the ESMP • Monitor implementation of instruments such as the C-ESMP and LMP • Monitor/control environmental impacts 	<ul style="list-style-type: none"> • Notify EEA of significant environmental impacts/aspects that arise during project implementation • Compile Project Compliance Reports to report quarterly to the EEA on the compliance status • Compile reports
Social Standards Officers (two)	<ul style="list-style-type: none"> • Manage all social development aspects of the project • Oversee all planned stakeholder engagement activities or in process of being implemented • Update SEP as and when necessary 	<ul style="list-style-type: none"> • Develop, implement and monitor all stakeholder engagement strategies/plans for the Project; Manage the grievance mechanism. • Prepare documents related to the management of Intensive stakeholder engagement. • Liaise with the project coordinator to ensure that stakeholder engagement requirements/protocols are understood; and • Proactively identify stakeholders, project risks and opportunities and inform the PM/PE/ to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.
Safety Officer	<ul style="list-style-type: none"> • Manage all OHS aspects of the project 	<ul style="list-style-type: none"> • Development, implementation, and monitoring of the Project Specific OCHSIP, compliance to national legislation, World Bank Environmental, Health, and Safety guidelines and • Ensure implementation of the LMP in line with the World Bank requirements.

Table 5: Roles and responsibilities for the PIU

7.1.2 Support Staff

EEC has several existing staff who shall provide support to the Project. The following offices have been identified within the EEC:

- 1) **GIS Office:** the surveyors have developed many transmission routing options and identified tentative resettlement impacts. It is expected that the office will continue to lend support to the Project Implementation Unit's Social Development Officer regarding the resettlement process.
- 2) **Legal office:** the legal office will assist in the drafting, and vetting of Contracts.
- 3) **Outsourcing Office:** will lend support with regard to contracting during Project implementation.
- 4) **Commercial Services:** inspects primary suppliers twice annually and will report to Project Implementation Unit any irregularities.
- 5) **Transport Department:** The EEC Transport Department is responsible for the Management of the fleet allocated to the Project Implementation Unit.

7.1.3 Other supporting stuff to the project include the following:

- 1) Community Liaison Officers (CLOs) : a total of thirteen (13) community liaison officers (CLOs), who are members of the PIU, have been engaged for the duration of the project. Each CLO represents an affected chiefdom within the project area, namely, Mapondweni, Ngwenyameni, Mchinsweni, Ezikhetheni, Manyiseni, Nkonka, Maplotini, Vimbizibuko, Kwaluseni, Hhohho Emuva, Mabonabulawé, Nsingizini and Mbilaneni. The duties of the CLOs include the following;
 - a) Facilitate the smooth liaison between contractors, staff and local residents by maintaining regular contact and networking with communities (located within reasonable proximity to the project construction site) and other key relevant stakeholders.
 - b) Tasked with the responsibility of managing expectations of interest groups.
 - c) Assist EEC in the identification of potential implementation problems and bottlenecks with regards to both the community and the local government relationships.
 - d) Work with the Social Development Officer, the project team and in line with the EEC communication strategy and the Stakeholder Engagement Plan to:
 - e) Disclose project related information to interest groups and people that are affected or likely to be affected by the project
 - f) Ensure that communities at construction sites are kept abreast of the project developments and communication channels remain open with the communities
 - g) Forward questions and grievances related to the project from the community members and leaders to appropriate authorities including the local authorities such as chiefs or their inner council representatives.
 - h) Risk and impact mitigation (including managing and resolving local grievances, conflict resolution and mediation) and
 - i) Through culturally appropriate and sensitive awareness raising, support community member access to the project GRM in relation to grievances related to the environmental or social performance of the NRAP
- 2) **Owner's Engineer (Consultant)** : shall provide institutional capacity and support to the Project Implementation Unit (PIU) with: (a) overall project management and supervision including procurement, design, contract management; and (b) oversee the overall implementation, monitoring, and reporting of safeguards aspects such as the ESMP, Labor Management Procedure (LMP), SEP and RAP.
- 3) **Sub-contractors** ; shall report and support Owner's engineer and shall complement the PIU in the construction of Component 1a and 2 of the Project.
- 4) **Third-Party Independent Monitoring Agency**; An independent Monitoring Consultant for the environment and social issues is engaged by the PIU called MMA. The independent monitoring consultant shall be responsible for ensuring compliance with approved plans and programs related to environmental and social issues. The independent monitoring consultant will be engaged throughout project preparation and implementation.

7.2 Integration and support

Since stakeholder engagement activities will influence other departments or require their inputs, the Social Specialist, through the 'Project Manager', needs to ensure that the various

managers are included or kept informed on the stakeholder engagement process. Decisions taken by managers might have a direct or indirect impact on communities which would need to be communicated at the appropriate time. In order to advance the Project, the PIU will work collaboratively with some of the EEC departments and stakeholders such as (i) Commercial Services, (ii) Finance, (iii) Corporate Communication and Marketing, (iv) Operations Division, (v) Corporate Services, (vi) Managing Director's Office. The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarized below.

EEC Departments	Role	Interest	Influence	Coordination	Frequency
Commercial Services	Coordinate overall procurement under the project and prepare and revise Procurement Plans as needed	High	High	Hold meetings to update procurement plans and review delivery timelines that have high project risk impact	Regularly
Finance	Account for the deposits and withdrawals of project funds with financial institution(s) and perform the audits and provide financial reports in accordance with the World Bank rules and guidelines	High	High	Hold meetings to evaluate project financial performance	Regularly
Corporate Communication and Marketing	Work with the Social Officer to conduct stakeholder engagement and project disclosure and outreach activities	High	Low	Hold meetings to review and update stakeholder engagement plan	Regularly
Operations Division	Ensure timely and efficient construction and commissioning of the transmission line, substations and quality control.	High	High	Hold project progress meetings to highlight project challenges and risks	Regularly
Corporate Services	Recruitment of PIU staff such as the Social Officer and Procurement Officer	Medium	Medium	Share PIU staff requirements	As needed
Managing Directors Office	Ensure timely approval of procurement processes	High	High	Provide updates on project progress through reports and meetings to discuss project risks that need their intervention	Regularly

Figure 3: Internal Departments for support to the project

7.3 Resources

The EEC Marketing and Corporate Communications (MCC) Department will be responsible for the design proper implementation and monitoring of the SEP. This department is responsible for the company-wide stakeholder management program at EEC. The MCC Manager will provide management oversight of SEP and will work closely with Project Team Members for expertise in the different functions required in the project. This is to ensure that the SEP is implemented in a successful manner.

7.4 Training

All parties involved on the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures. All ESIA and RAP service provider personnel will also be subject to induction training that covers the relevant SEP aspects and activities that they will be engaging in during the development and implementation of these respective processes.

7.5 Budget

The SEP is financed from the project resources under component 1a and 2 of the project's components with a sum of **E560,100.00**. As the SEP is a living document, this budget shall be updated to reflect additional stakeholder activities as project implementation progresses.

No.	Stakeholder Engagement Activities	Qty	Unit	Unit Cost	Total Cost (E)
1	Inductions for Contractor workers refreshments	15	No.	E7,500	E112,500
2	GBV Sessions refreshments	21	No.	5200	E109,200
3	Printing of GRM educational posters (both official languages) & translation services	15		200	E3,000
4	Printing of RAP Summary posters	50		150	E7,500
5	National Newspaper adverts - GRM	2	No.	10000	E20,000
6	Printing IEC material related to GBV/SW	30		120	E3,600
7	PA system for awareness raising of Mobile clinics	5	No.	4000	E20,000
8	National Newspaper advert - GBV/SW GRM	2	No.	10000	E20,000
9	Issue of Public Notice of Cut of date (National Newspapers)	2	No.	10000	E20,000
10	Airtime for CLO's to communicate with PAPs during RAP implementation	13	No.	100	E1,300
11	Refreshments for RAP Disclosure meetings	14	No.	1000	E14,000
12	Refreshments for RAP Contract signing meetings	14	No.	1000	E14,000
13	Local travel to meet with stakeholders (diesel, mileage, servicing car) – assuming 50 meetings	50		1500	E75,000
14	Meeting venue (outside of EEC) – assuming 20 meetings outside	20		1800	E36,000
15	Lodging costs during RAP and other stakeholder engagement meetings	20		5200	E104,000
	TOTAL SEP COST				E560,100

7.6 Contacts

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8. GRIEVANCE REDRESS MECHANISM (GRM)

As described in the key terms definition, a Grievance is a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to EEC operations and the livelihood, well-being or quality of life of the claimant(s). As a result, the objective of the project Grievance Redress Mechanisms (GRM) is to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow EEC through the NRAP project team to respond to and manage grievances filed by affected people and other parties.

Grievances may emerge from directed and indirect interventions related to component 1a and 2 civil work activities. Grievances may arise among affected households and communities on a variety of issues ranging from compensation rates and eligibility criteria to the relocation sites and the quality of services available at those sites, where applicable. Sexual Exploitation/Harassment SEA/SH related grievance are also expected to arise from the project implementation activities particularly during construction phase. Workers' related grievances mechanisms are addressed on page 69 section 10 of the Labour Management Procedure (LMP) and Resettlement related grievance are addressed in accordance with the Resettlement Policy framework (RPF) and the RAP GRM developed and disclosed September 2022.

8.1 Scope of GRM

The GRM process is anchored from the World Bank requirements and the EEC Communication Policy. According to the World Bank's SS10 paras 26-28 section on Grievance Redress, the Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances. The EEC Communication Policy facilitates that the EEC not only engages stakeholders, customers and communities the company works in but also provide means of them to report, feedback and raise concerns.

8.1.1 Responsibilities

The GRM is the responsibility of the Social Development Officer. The project manager and EEC principals, the Ministry (MNRE) or any appointed independent party will intervene during the grievance process to approve the complaint/grievance resolution report including the proposed solutions.

8.2 Objectives of the GRM

The NRAP has established GRMs as part of the accessible and inclusive means to raise issues and grievances and allow EEC through the project team to respond to and manage grievances filed by affected people and other parties.

The **key objectives** of the GRM are therefore to:

- Record, categorize and prioritize the grievances.

- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

8.3 Confidentiality

The personal details of Complainants shall only be made available to those involved in the resolution of the grievance in question and must follow policies related to protecting personal data when handling the grievance. The EEC will accept, log, and seek to address grievances contained in anonymous grievance forms, but, due to the anonymous source of the grievance, will not be able to respond directly to the Complainant.

8.4. Design of the GRM

The design of the GRM takes into consideration the views of affected communities expressed during the resettlement planning process. It also takes into consideration the location of the intended, their language use and level of education. It is for this reason that simple forms written in Siswati have been placed within communities with the main logbook placed at Constituency level within all three project Constituencies. The *guiding principles* in the GRM design include the following:

- ✓ **Fairness** - Grievances are treated confidentially, assessed impartially, and handled transparently.
- ✓ **Objectiveness and independence** - The GM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. GM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- ✓ **Simplicity and accessibility** - Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them. Project beneficiaries have a range of contact options including, at a minimum, a telephone number (preferably toll-free), an e-mail address, and a postal address. The GM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GM does not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).
- ✓ **Responsiveness and efficiency** - The GM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances are trained to take effective action upon, and respond quickly to, grievances and suggestions.
- ✓ **Speed and proportionality** - All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
- ✓ **Participatory and social inclusion** - A wide range of project-affected people—community members, members of vulnerable groups, project implementers, civil society, and the media—are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, are able to access the GM.

8.4.1 Guiding procedure of the GRM

The PIU is required to disclose and explain to affected persons, communities' stakeholders the procedure for complaints filing as early as possible and on a regular basis throughout the project cycle. As alluded in the principles above, the GRM shall be available at no cost, and it is important that it be easily accessible, with special attention paid to accessibility for disadvantaged and vulnerable individuals or groups. Additionally, the PIU will ensure that the grievance procedure is accessible, adequately registered and tracked, and resolution is affirmed within one month of registration as outlined in the **Figure 4** below.

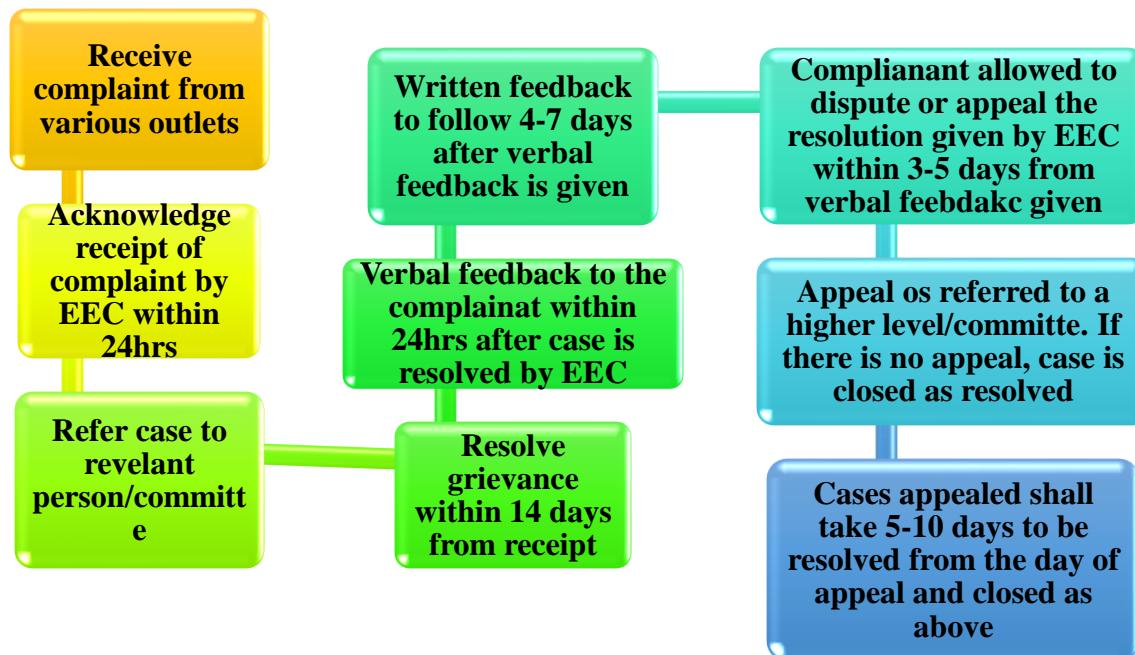


Figure 4: NRAP GRM Process Flow

The following procedures shall be followed while filing and processing complaints through the above described NRAP GRM process in Figure 4:

i) Grievance Register Book:

A grievance register book shall be opened and kept in the office of resident engineer, EEC Community Liaison officer and at the Inkundla. All grievances shall be registered when and upon the receipt of complaints from the aggrieved. The book shall have: i) case reference number, ii) the aggrieved name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column.

ii) Responsibility for Registering Complaints:

The Resident Engineer, CLO, and Indvuna yeNkhundla in the project area shall register in the Grievance Register Book all complaints received.

At the project level the Social Standards team shall be responsible for receiving and filing all NRAP cases whilst GBV cases shall be handled with the assistance of NATICC who shall keep a SEA/SH separate register as well.

iii) Case Receipt:

Within 24 hours of receiving complaints, the monitoring consultant, EEC social team shall issue a letter to the aggrieved acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue.

vi) SEA/SH SEA/SH grievances will not be documented in the public accessible book. However, a SEA/SH action Plan has been prepared to manage related risks, and a specialized NGO is working in partnership with EEC which is NATICC engaged for awareness on the already developed system that captures SEA/SH and HIV/AIDS related issues. It is attached in this section below on GBV/SEA/SH GRM.

v) PAPs:

All PAPs who have issues with their compensation and assistances are required to submit written complaints to the appropriate level of GRMs or directly verbally report to CLO's and nearest EEC depot/service center. Both depot and service center agents have been trained as of August 2022 on the NRAP GRM process and procedure.

xi) Recording

Mediation meetings and outcomes will be recorded and kept in safe places at each of the Grievance Redress Mechanism Committee's locations.

8.4.2 Potential issues and complaint filing

Grievances are expected to arise:

a) Directly from affected property owners and will be handled as follows;

- The aggrieved person will first report his/her case to the Project Area Community Liaison Officer working in the 13 communities affected by the project For communities under component 2 of the project which do not have CLO's, the Electricity group chairperson's, Bucopho are used to report project related grievances. They have been trained on how to refer these cases reported to them.
- The Community Liaison Officer will report the grievance to the Project Engineer/ Resident Engineer who will address the grievance and feedback the Community Liaison Officer within five working days. For those cases requiring the attention of PUI shall be reported directly to the Social standards team at EEC.

b) Grievances may also be reported through EEC's 24-hour Call Centre, which uses a system called CRM that allows for the tracking of issues as they are scaled up and resolved allowing for feedback to the complainant. When the complaint is raised, it is registered and a job card to resolve the complaint is issued. Once the complaint is resolved, the job card is signed off. The PIU and supporting EEC staff to the project have been trained as of August 2022 on the Social Standards process of login and following up cases on CRM.

Through the office of the Social Standards team, the EEC will systematically track grievances lodged related to Project implementation and, as part of the tracking system, keep a separate record of any grievances that may arise as part of the resettlement and compensation process. It shall

ensure that grievances are sorted at the point of registration is to specifically address the special concerns which relate to compensation, relocation or livelihood restoration in a timely manner. Compensation grievances shall follow the developed RAP GRM process in the disclosed RAP. The points of access for grievances will be shared as part of consultation with all PAPs and through broader community consultation. The Community Liaison Officers and the Social Officer will serve as the points of registration for any resettlement related complaints and oversee the process to reach resolutions. The issue can be logged as an anonymous grievance. Below is a non-exhaustive list of possible access points for grievances of the project (these shall be updated as and when new outlets are identified):

No.	Grievance Outlet/Access point
01	Verbal through reporting to CLO's
02	Verbal through reporting to Group scheme chairperson/ Committee member/ Bucopho/ Umphakatsi representative
03	Verbal through reporting to Social Specialist/PIU members and EEC support staff
04	EEC Hluthi and Nhlangoano depot and service centers
05	Constituencies Log Book (5 Tinkhundla)
06	EEC website – www.eec.co.sz
07	EEC Contact Centre -
08	World Bank website – www.worldbank.org
09	Through letters submitted to the Ministry of Natural Resources
10	Through letters submitted to the EEC, Head offices, Mbabane P.O.Box 258
11	Eswatini Environment Authority (EEA)
12	Eswatini Energy Regulatory Authority (ESERA)

Table 6: NRAP Grievances Outlet/access points

8.4.3 Closure of Grievance

A grievance will be considered resolved or closed when a resolution satisfactory to both parties has been reached and after corrective measures have been successfully implemented. Once the solution is under implementation or has been implemented to the satisfaction of the complainant, an outcome/close out form shall be signed by both parties, stating that the grievance has been closed. The grievance will then be archived in the project grievance database (excel spreadsheet).

8.5 Grievance Redress Mechanism Structures

As the GRM works within existing legal and cultural frameworks, it is recognized that in the Project's GRM, grievances will be handled following a hierarchical structure of dealing with all complaints received. The entry level structure is the Community Level GRM, this level is followed by the Project Level GRM where cases not solved at first entry are taken to this level. EEC level and Regional level structures are also taken into consideration before reaching the final structure in the hierarchy which is the National Level GRM structure which shall have all cases resolved at this level as the final structure in resolving grievances related to the project. The *GRM grievance resolution process* involves the following *main steps* at each level:

1. Receipt of grievances and acknowledgement

2. Screening for standing and/or acceptance or rejection
3. Processing of complaint
4. Grievance resolution approach
5. Closure of grievances;
6. Handling of grievance records and documentation.

For handling grievances relating to sexual exploitation and abuse (SEA) and sexual harassment (SH), please refer to SEA/SH action plan prepared in below sections.

8.5.1 Community Level Grievance Redressal Mechanism

It is recognised that local communities have existing traditional and cultural grievance redress mechanisms. This level therefore refers to complaints/ grievances that can be resolved directly between the site and the complainant through traditional and cultural grievance redress mechanisms. During the project implementation, it is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of EEC, contractor(s), and or Government representatives at local and national level.

8.5.1.1 Grievance handling Process under this level:

- ✓ CLO provide first receiving platform for issues,
- ✓ When a grievance is logged to the CLO's, they must acknowledge the complaint within 24 hours of receipt of the complaint.
- ✓ The Social Standards team within EEC must acknowledge the complaint within 24 hours of receipt of from CLO.
- ✓ If the complaint is logged anonymously, it will be automatically referred to the head of the Project Unit which is the Project Coordinator who shall be assisted by Social team to review the complaint.
- ✓ If not anonymous, upon registration, the Social Standards team will refer the issue for resolution or mediation to relevant officials.
- ✓ The SS team shall sort feedback from the relevant officials handling the cases assigned to them within 5-7 days so to update the Complainant of the status
- ✓ If a hearing through the GRM Committees (explained below) at this level is required, the grievant shall be notified at this stage
- ✓ All cases should be resolved within 10 – 14 days at this level

8.5.1.2 Community Level GRM Committee

At community level the project will establish a GRM committee and shall have the following members:

- The Supervising Consultant, Chair
- The Resident Engineer, Member
- The Contractor, Member
- EEC Community Liaison Officer
- EEC Social Standards Officer and the Assistant Social Standards Officer
- PAPs' representative

8.5.1.3 Community Level GRM Access Points:

The points of access for grievances shall include and not limited to the following:

- i. GRM Form available in both local languages – placed with Group schemes chairpersons, Bucopho, Tinkhundla centre, and project CLO's.
- ii. Nhlana and Hluthi depot walk-ins
- iii. EEC Tol free line –
- iv. EEC website – www.eec.co.sz
- v. CLO's on the ground
- vi. Electricity Group scheme Committee Members

8.5.2 Project level Grievance redressal Mechanism

This refers to the process that needs to be followed when the grievance cannot be resolved directly between the site and the complainant, requiring a review by a Grievance Committee. Issues that are not resolved at Community level GRC shall be handled at the project level by PIU. A project level GRM is a harmonised system for all project related disputes and resolutions. Its objective is to bring the GRM closer to all stakeholders at various levels of project implementation. Issues that are not resolved at first instance dispute/grievances resolution shall be escalated to the next level. All effort shall be made to resolve issues at the first instance.

8.5.2.1 Grievance handling Process

- ✓ The SS team shall refer cases not solved at first instance within 24hrs after evidence that case resolution is not being reached at first instance.
- ✓ The project level GRM committee shall resolve or reach a decision five (5) days from the date the complaint is received.
- ✓ The chairperson of the GRM committee shall communicate the committee's decision to the aggrieved PAPs in writing and keep record of all decisions related to each case
- ✓ SS shall keep records of all the writings and update records related to the case accordingly

8.5.2.2 Project Level GRM Committee

The Project level GRM shall comprise of the following members:

- PIU Project Coordinator – Chair

- Project Engineers
- Social Standards Officer
- Assistant Social Standards Officer
- Environmental Officer
- Safety Officer
- EEC Legal/Compliance Officer
- EEC Marketing Manager

8.5.3 Regional Level Grievance Redressal Mechanism

The objective of the regional level GRM is to resolve complaints that the project level GRM is unable to handle.

8.5.3.1 Grievance handling Process

- ✓ The Project Coordinator/Manager shall refer cases not handled at project level to this level in writing requesting intervention
- ✓ Regional level GRM shall do everything possible to resolve issues within fifteen (15) – twenty-one (21) days from the date the case has been transferred to it from the project level GRM.
- ✓ The chairperson of the GRM committee shall communicate the committee's decision to the aggrieved (PAPs) in writing and keep record of all decisions related to each case.
- ✓ SS team shall keep records of all the writings and update records related to the case accordingly

8.5.3.2 Regional level GRM Committee

The Regional level GRM shall comprise of the following members:

- Regional Secretary, Chair person
- Municipality CEO
- Ministry of Housing Regional Representative
- EEC Branch Manager
- Social Standards team
- Marketing Manager
- Environmental Officer
- Project Coordinator
- Safety Officer

8.5.4 EEC Level Grievance redressal Mechanism

A committee of knowledgeable persons, experience in the subject area, shall be constituted at the EEC to handle complaints that have not been addressed or resolved at the Project level in the impact area or the project area corridor.

8.5.4. 1 Grievance handling process

- ✓ The EEC level Grievance redress committee shall do everything possible to hear and determine the issues within five (5) days from the date the case has been transferred to it from the GRC.
- ✓ The chairperson of the GRC shall communicate the outcome to the aggrieved PAP(s) in writing.
- ✓ The GRC shall maintain a record of all outcomes related to each case.
- ✓ If the complaint is not resolved to the satisfaction of the aggrieved party, it will then be referred by the EEC Secretary to the National Steering Committee (NSC).
- ✓ The NSC will be required to address the concern within 1 month. Should measures taken by the National Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Ombudsman's Office, and the Ombudsman's decision will be final. It is rare for a complaint to be unresolved after the Ombudsman's decision, or for the Ministry of Natural Resources and Energy (MNRE) resolution, to be taken further. However, on both cases, the very last resort will be at the Courts, or more specifically the Land Court for any related disputes.

The EEC level GRM shall be comprised of the following members:

- General Manager, Chairperson
- Legal Compliance Officer, Member
- Social Standards Office team, Members
- Safety, Health, Environmental, Risk and Quality (SHERQ) Manager
- PAPs Representative

8.5.5. Judiciary Level Grievance Redressal Mechanism

The project level process will not impede affected persons access to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of Eswatini. Grievance handling Process

- ✓ This level of GRM will involve the corporation engaging or seeking National Judiciary systems to solve the case depending on the type of case.
- ✓ For instance, if it is employment related, the Industrial court shall be involved, and all judgement shall now depend on the courts and shall be deemed final after following all court procedures.
- ✓ The time frame of resolving cases at this level are now beyond the control of the EEC hence cases timeframe shall be deemed by the Court engaged.
- ✓ Decisions taken here shall be deemed final decision for all cases of the project at country level.

8.5.6. World Bank Grievance Redress Service

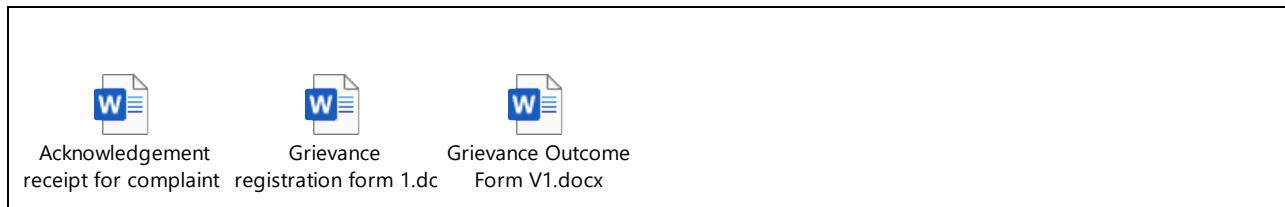
Grievances are referred to the World Bank GRM Service in situations where the Project GRM has failed to reach an amicable resolution of disputes lodged.

8.3.6.1 Grievance handling Process

- ✓ Communities and individuals who believe that they are adversely affected by the Project can submit complaints to the World Bank's Grievance Redress Service (GRS) - known as the World Bank's independent Inspection Panel⁸ which determines whether harm occurred, or could occur, as a result of non-compliance with its policies and procedures.
- ✓ Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and World Bank Management has been given an opportunity to respond.
- ✓ For information on how to submit complaints to the World Bank's corporate Grievance Redress Service, please visit; <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit:
- ✓ www.inspectionpanel.org.
- ✓ Email: grievances@worldbank.org
- ✓ Fax: +1.202.614.7313
- ✓ Mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street,

8.6 GRM Forms

The CLO's are then tasked with recording all GRM forms submitted to the Log book for candid handling of grievances, however for those recorded anonymously shall be submitted straight to the Social Specialist. The GRM forms to use at community level to report grievances related to the project is attached:



8.7 Grievance training

In an effort to make the projects GRM process and procedure to be effective and efficient as possible, the World Bank team through The Social Development team shall be requested from time to time to deliver a participatory GRM Assessment and Training Workshop which aims the following:

- i) Raise the PIUs' (PITs) awareness on the importance of GRMs in development projects;
- ii) Build PIUs capacity in grievance management, resolution and feedback as well as reporting and analysis of grievances to improve project implementation; during the GRM assessments.

Furthermore, The Social Standards team within EEC shall also ensure that all those involved in the project GRM are trained on the procedure including the Committee members. As of August 2022, the PIU, CLO's and traditional authorities, Depot technicians, service centre and call centre agents have been trained on the GRM process of the project.

8.8 Awareness raising and GRM Disclosure

Part of an effective GRM is an adequately disclosed process and procedure to all Stakeholders of the project at all levels. Annex reports, minutes, register are attached which show GRM disclosure to PAPs and many other stakeholders of the project with the latest disclosure including the RAP GRM and GBV GRM in communities between May to October 2022.

8.9 TREATMENT OF GENDER BASED VIOLENCE (GBV) INCLUDING SEXUAL EXPLOITATION/ABUSE/HARASSMENT (SEA/SH) CASES

The NRAP has partnered with NATICC as a service provider to assist with handling all GBV related cases of the project with an MOU entered into since June 2020. The NATICC is one of the leads GBV organizations in the Shiselweni region. Not only does the NATICC assist with GBV cases, but they also assist with prevention activities such as GBV awareness sessions in communities and schools in the project area.

With respect to complaints relating to sexual exploitation or abuse and sexual harassment, because of the risk of stigma, reprisals and rejection that can be associated, this GRM will only serve to;

- i. Refer complaints to GBV service providers (NATICC) and ensure case is closed
- ii. Record resolution to the complaint

When a sexual exploitation and abuse (SEA) or Sexual harassment (SH) type grievance is submitted, EEC social personnel focal person who is trained in managing SEA and SH type of grievances should report the complaint to the GBV service provider within 72 hours. Otherwise, when the complaint is received, the procedures set out should be adapted to ensure the following;

1. Confidentiality of information; Confidentiality is essential throughout the process otherwise the survivor risks retaliation and loss of security. No identifiable information on the survivor should be stored in the GRM. The GRM should not ask for or record information on more than the following related to the SEA/SH allegations;
 - ✓ Nature of the complaint (what the complainant says in his or her own words without direct questioning)
 - ✓ If possible, whether the perpetrator was to some extent associated with the project
 - ✓ Age and sex of survivor
 - ✓ Information on whether the survivor was referred to services
2. After recording the above information, the GRM GBV focal person which is the EEC social standards team shall provide survivors with information regarding options for reporting and responding including referral to existing GBV service providers who will be able to provide health, psychological and legal support.

NB: No attempt shall be made to investigate the complaint, rather an immediate referral shall be made.

3. The case is closed when the survivor no longer requires support.

Table below summarizes the steps to be undertaken once a SEA/SH case has been reported.

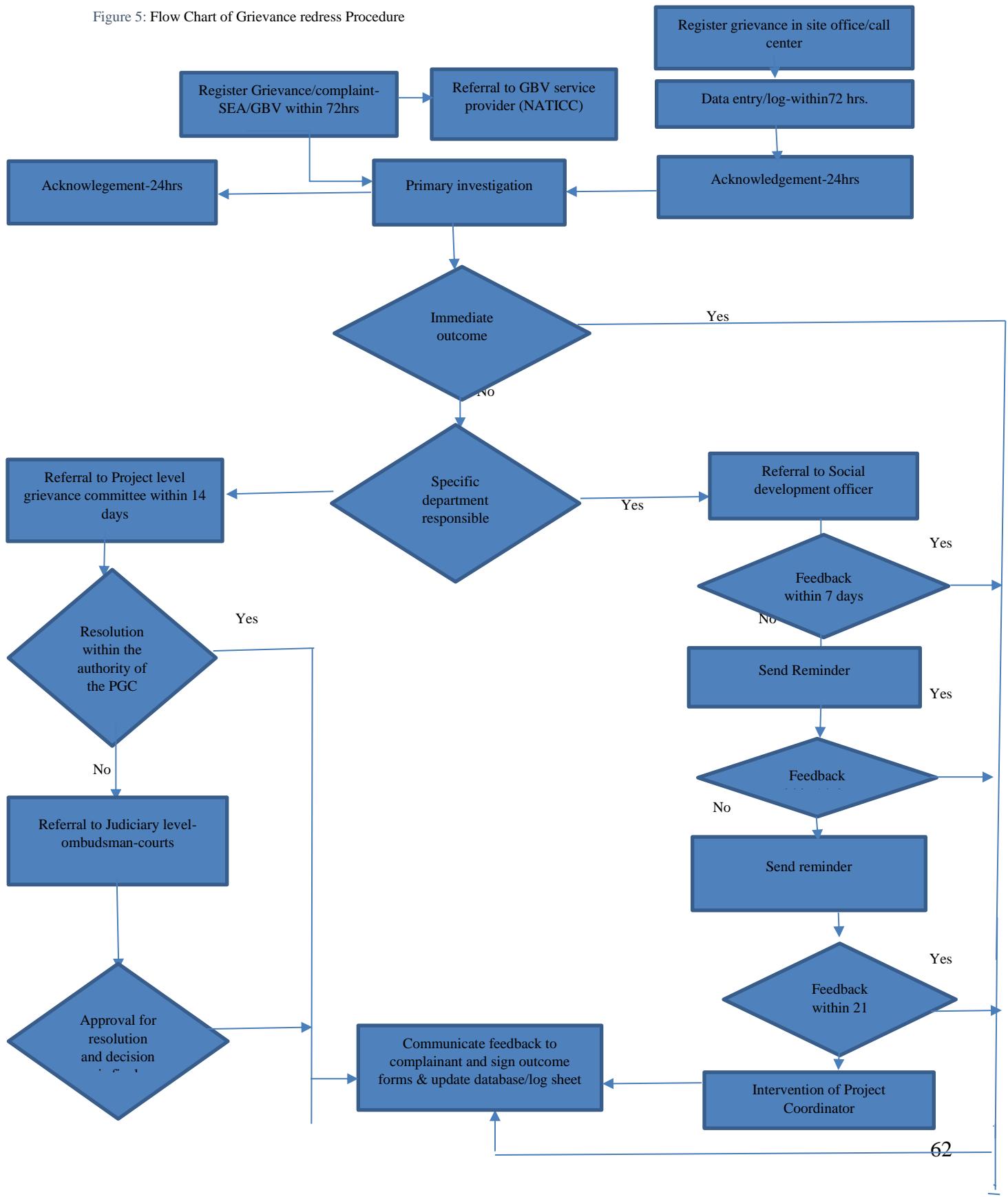
8.9.1 SEA/SH Complaint Process

Steps	Responsibility	Action	Feedback/Follow-up	Timeline
Receiving GBV Complaint	EEC (CLO, Social Development Officer, Contractors, Contact Centre)	Logging case in Log Book	Acknowledge receipt of complaint and advice that case will be referred to NATICC (via phone)	Within 24hrs
Make Referral	EEC (Social Development Officer)	Use national referral form and submit with NATICC	Record in Log book that case has been referred for easy follow up/tracking.	Within 24hrs
Receive referral	NATICC	Contact the survivor/complainant and submit to EEC Form 2 which is Receipt of referral form for Client requiring care and protection	Acknowledge receipt from EEC through signing in Log Book. Survivor given a Feedback Slip.	Within 72 hours
Case handling	NATICC	Fact finding, counselling and protection if need be, court proceedings if need be till case is resolved	Survivor must provide informed consent along the entirety of the process and shall be engaged at every step of the case management. EEC shall provide feedback only on status of the case (for confidentiality issues).	Dependent on the type of case (e.g. sexual vs emotional or financial abuse)
Solved Case	NATICC & EEC	NATICC to feedback survivor on resolved case including the resolutions taken and assessment if such solutions are satisfactory and do not impose any future danger to the victim. Feedback loop to survivor will take into consideration his/her security (if needed) and confidentiality and then to aggressor.	NATICC to notify EEC on case resolved and EEC to update Log Book accordingly.	Within 24hrs
Record keeping of case	EEC & NATICC	Log all cases received, update status on cases as they are being resolved.	EEC and NATICC Social Development Officer to discuss Log books and consolidate accordingly.	Monthly

Table 7: NRAP GBV/SEA/SH Complaint Process

The key task in implementing the grievance mechanism is summarized in **Figure 5 below** and described above.

Figure 5: Flow Chart of Grievance redress Procedure



8.10 GBV/SEA/SH Action plan

In alignment with the ESMP and ESS4 of the world Bank, the NRAP developed an Action plan that has activities that address GBV/SEA/SH requirements of the project. The Action plan is described below.

Objectives of the Action plan

- A. To discuss strategies and support mechanisms to prevent and respond to allegations of GBV
- B. To provide guidance for adapting the GRM to allow for the uptake of SEA/SH allegations

Revision date: *This action plan has been revised as of September 2022 and is a living document shall be revised as and when necessary, in relation to GBV activities.*

ACTION	TIMING OF ACTION	RESPONSIBILITY	ONGOING MANAGEMENT	RISK	BUDGET
<p>Sensitization of interested and affected parties of the importance of addressing GBV and the mechanisms that will be implemented (assessment of underlying risks and social situation)</p>	<ul style="list-style-type: none"> Preparation during ESIA process <p>31st March 2021</p> <ul style="list-style-type: none"> Project implementation (before civil works commence) and during the construction phase 	<ul style="list-style-type: none"> PIU Contractors (ESMP) 	<ul style="list-style-type: none"> PIU to monitor the situation in collaboration with service providers who will provide guidance where necessary Updating of ESMP's during implementation when the risk situation changes 	-	
<p>Consultation meetings engaging a variety of stakeholders conducted to inform them of GBV risks including project activities to get their feedback on project design and safeguard issues (political, cultural leaders, health teams-Rural health motivators (RHM), women groups and organizations working with children</p>	<ul style="list-style-type: none"> Throughout project life cycle 	<ul style="list-style-type: none"> PIU 	<ul style="list-style-type: none"> Monitoring and evaluation of implementation of SEP 	-	

NRAP Stakeholder Engagement Plan, December 2022

<p>Mapping out of GBV prevention and response players in the different communities in which the project is currently being implemented, Somtongo (Cabrini Ministries), Hosea (World Vision), Matsanjeni South (SWAGAA), Zombodze Emuva and Shiselweni 1 (NATICC DSW). This should include an assessment of the service providers capabilities to provide a survivor centered approach (case management, advocate, referral for services outside their scope, such as legal support-DSW), DCS-Royal Eswatini police</p>	<ul style="list-style-type: none"> • Preparation • Implementation <p>31st January 2021</p>	<ul style="list-style-type: none"> • PIU 	<ul style="list-style-type: none"> • Update GBV service providers stakeholder directory if there are any changes 	<p>-</p>
<p>Include all GBV risks that have been identified during social assessment in all safeguard instruments (ESMP) and also that of the contractors aligned to the company ESMP. The GBV stakeholder directory should form part of this ESMP for it to be effective and efficient</p>	<ul style="list-style-type: none"> • Preparation • Implementation <p>28th February 2021</p>	<ul style="list-style-type: none"> • PIU-Social Development • Contractors (Sub-contractors) 	<ul style="list-style-type: none"> • Continuously updating of ESMP when risk situation changes • Conduct ongoing reviews during spot checks and site visits 	<p>-</p>
<p>Clearly define the GBV requirements and expectations in all bidding documents</p> <p>Clearly explain and define the requirements of the bidders Code of Conduct to bidders before submission of bids</p>	<ul style="list-style-type: none"> • Procurement <p>31st March 2021</p>	<ul style="list-style-type: none"> • PIU • Bidders 	<ul style="list-style-type: none"> • Review by Evaluation team and PIU 	<p>-</p>

<p>Contractor's responses to the GBV requirements to be reflected in their C-ESMP and evaluated to ensure that the bidders ability to meet project GBV requirements are verified prior to finalization of the contract</p>	<ul style="list-style-type: none"> Implementation (Before civil works commences) <p>28th February 2021</p>	<ul style="list-style-type: none"> Contractors PIU 	<ul style="list-style-type: none"> Ongoing review during implementation 	<p>-</p>
<p>Code of conduct singed and understood by all parties;</p> <ul style="list-style-type: none"> Ensure obligations in the code of conduct are clearly understood by those signing Have code of conducts signed by all parties involved in the project Train project staff on the behavioral obligations under the code of conduct (training on SEA, SH and GBV) Disseminate code of conduct to all parties as part of their contract agreements Refresher sessions on GBV for contractor workers who have already signed CoC. 	<ul style="list-style-type: none"> Pre-bidding conference Implementation (prior to construction) Implementation <p>August 2022</p>	<ul style="list-style-type: none"> PIU Supervising consultant Contractors GBV service provider 	<ul style="list-style-type: none"> Ongoing review during implementation 	<p>-</p>

<p>Avail an effective grievance redress mechanism with multiple channels to initiate a complaint.</p> <p>GRM should have:</p> <ul style="list-style-type: none"> • Specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. • AGBV specialist to support project implementation • Printed pamphlets with project GRM contact details distributed amongst project area community members and project workers. 	<ul style="list-style-type: none"> • Project preparation and implementation <p>28th February 2021</p> <ul style="list-style-type: none"> • PIU • Supervising consultant <p>31st March 2021</p> <ul style="list-style-type: none"> • Ongoing review during implementation 	-		

	December 2022			
Sensitizing of high schools with a few selected primary schools along the project area. Focus to be on young girls mostly.	<ul style="list-style-type: none"> • Project preparation and implementation • October 2022 – December 2022 	<ul style="list-style-type: none"> • PIU 	<ul style="list-style-type: none"> • Developing and monitoring schedule for schools with the GBV service provider to ensure they are availability. 	E3000.00 for implementing team refreshments

NRAP Stakeholder Engagement Plan, December 2022

Refresher training sessions for project affected communities with a focus on women and girls.	<ul style="list-style-type: none">• Implementation• August 2022 – October 2022	<ul style="list-style-type: none">• PIU	<ul style="list-style-type: none">• Developing and monitoring schedule for session with the GBV service provider to ensure they are availability.	<ul style="list-style-type: none">• E54, 600.00 For refreshments
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Table 8: NRAP GBV/SEA/SH Action Plan

9. MONITORING AND EVALUATION

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and that stakeholders have been meaningfully consulted throughout the process. Monitoring involves gathering information on the impacts of actions and progress towards objectives as a basis for future action (Jiggins & Roling 2002). Monitoring and evaluation of the stakeholder process is considered vital to ensure EEC is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective.

Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- ✓ Sufficient resources to undertake the engagement;
- ✓ Inclusivity (inclusion of key groups) of interactions with stakeholders;
- ✓ Promotion of stakeholder involvement;
- ✓ Sense of trust in EEC shown by all stakeholders;
- ✓ Clearly defined approaches; and
- ✓ Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Two distinct but related monitoring activities in terms of timing will be implemented:

- **During the engagement activities:** short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- **Following completion of all engagement activities:** review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

9.1 Review of Engagement Activities in the Field

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

The engagement team will conduct debriefing sessions while in the field. This assesses whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary. The use of engagement tools developed through the ESIA engagement including:

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

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

9.2 Reporting Stakeholder Engagement Activities

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

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

In assessing performance, the following will be considered:

- Materials disseminated: types, frequency, and location;
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. women, youth, community leaders);

- ✚ Number of people attending public or formal meetings
- ✚ Number of comments received on specific issues, type of stakeholder and details of feedback provided;
- ✚ Numbers and type of stakeholders who meet the Project team by mail, telephone and any other means of communication;
- ✚ Meeting minutes, attendance registers and photographic evidence;
- ✚ Comments received by government authorities, community leaders and other parties and passed to the Project;
- ✚ Numbers and types of feedback and / or grievances and the nature and timing of their resolution; and the extent to which feedback and comments have been addressed and have led to corrective actions being implemented.

The Social Standards (SS) office plays a critical role as internal change agent for social and stakeholder-related matters at EEC. This becomes important if social and stakeholder risks identified need to be escalated for higher-level decision-making to identify a resolution. The SS office needs to remain actively involved with the community development and land acquisition/resettlement planning and implementation in order to identify potential risks or opportunities and ensure that the needed administrative support is provided. Moreover, grievances submitted as part the community development and land acquisition/resettlement processes need to be addressed under the GRM scheme.

9.3 Key Performance Indicators

A series of key performance indicators for each stakeholder engagement stage have been developed. A series of key performance indicators for each stakeholder engagement stage have been developed. Table below shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Project Phase	Key Activities	Indicator
Planning for construction	Preliminary Stakeholder engagement on project designs and anticipated impacts.	Stakeholder engagement report
Project Implementation	<ul style="list-style-type: none"> ✓ Project Notices issued (construction activities included) ✓ Grievance Redress 	<ul style="list-style-type: none"> ✓ Newspaper clippings ✓ All grievances addressed as per grievance procedure
Project Implementation	SEP Implementation	SEP reports
Project Implementation	Pre EEC-Customer Education	Customer Education reports
Project Completion	SEP implementation	Project SEP final report

Table 9: Key Performance Indicators by Project phase

The identification of project-related impacts and concerns is a key element of stakeholder engagement that will occur over the complete project life-cycle. As such, the identification of new concerns and impacts as the ESIA, RAP and as the Project progresses will serve as an overall indicator for the utility of the stakeholder engagement process. In the ESIA reports (disclosed August 2022) there were reviews of the engagement activities conducted; levels of stakeholder involvement (particularly for affected communities, women and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESIA report, particularly with respect to mitigation and monitoring strategies contained in the Environmental and Social Management Plan (ESMP).

9.4 Monitoring levels of Engagements

Low	High



Figure 6: Monitoring levels of Engagements

9.4.1 *Inform* - To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.

9.4.2 *Consult* - To obtain public feedback on analysis, alternatives and/or decisions

9.4.3 *Involve* - To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.

9.4.4 *Collaborate* - To partner with the public in each aspect of the decision, including the development of alternatives and the identification of the preferred solution.

9.4.5 *Empower* - To place final decision making in the hands of the public.

9.5 Evaluating Levels of engagements

Quantitative indicators	Qualitative indicators
Numbers of project level meetings and attendance levels	<ul style="list-style-type: none"> ✓ Growing solidarity and mutual support between project and project area ✓ People begin to have a say in and to influence local politics and policy formulation related to Electricity and Rural electrification specifically
Percentages of different groups attending meetings (e.g. women, vulnerable groups)	Interest to be involved in decision making at different stages by stakeholders
Numbers of direct project beneficiaries.	Increasing ability of stakeholders to propose and undertake actions
Take-up rates of project recommendations Received from stakeholders.	Interaction and the building of contacts with other groups and organizations in the Energy sector.
Numbers of local people who are involved in different stages of the project.	

Table 10: Evaluation of engagements levels for the NRAP

END

10. ANNEXES

This section presents all reports, minutes, workshops, trainings, pictures and all other evidence of engagements done at preliminary stage for Component 1 and 2 of the projects as well as the on-going implementation phase which includes mostly pre-construction and RAP activities. This section is such that the preliminary engagements are at the top to the latest engagements being the last.

ANNEX A: BACKGROUND INFORMATION DOCUMENT & PUBLIC POSTERS

EEC
Eswatini Electricity Company

NETWORK REINFORCEMENT AND ACCESS PROJECT

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND RESETTLEMENT ACTION PLAN PROCESS

RATIONALE

Through the Ministry of Natural Resources and Energy (MNRE), the Eswatini Electricity Company's (EEC) proposed Network Access and Reinforcement Programme (NRAP) (hereafter referred to as the 'Project') supports the Government of the Kingdom of Eswatini's (GoKE) goal to provide universal access to electricity by 2022 as stated in the Eswatini National Energy Policy. The Shiselweni Region remains the poorest of the four regions within Eswatini with high poverty indices and has been identified as the region with the lowest electricity access rate. The existing network within the region has limited capacity to reliably deliver the power needed to meet current and potential future demand. The proposed development objective of the Project will be to target the Shiselweni region of Eswatini and strengthen the electricity network to improve the quality and reliability of service and increase access to electricity.

PROJECT DESCRIPTION

The scope of the proposed project includes:

- (i) Construction of an 87km 132kV Nhlangano – Lavumisa overhead transmission line;
- (ii) Construction of three new 132/11kv substations at Hluti, Matsanjeni and Lavumisa;
- (iii) Upgrading of the existing Nhlangano 11 132/06/11kv substation; and
- (iv) Distribution network reinforcement and electricity access to households.

The Government of the Kingdom of Eswatini (GoKE) has requested financing from the International Bank of Reconstruction and Development (IBRD) for the proposed Network Reinforcement and Access Project (P166170). The Eswatini Electricity Company (EEC) has appointed Coastal and Environmental Services (herein after referred to as CES) to undertake an Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) Process in accordance with the World Bank's Environmental and Social Framework (ESF) and General Environmental, Health and Safety (EHS) Guidelines. In addition to these documents, CES will submit an Initial Environmental Evaluation Report (IEE) and a Comprehensive Mitigation Plan to the Eswatini Environmental Authority (EEA) as required by the Eswatini's Environmental Audit, Assessment and Review Regulations (2000).

PUBLIC PARTICIPATION

A critical element of the ESIA and RAP process is the public participation process. The objective is to contact, notify and inform as many stakeholders and members of the community, who may be interested and/or affected by the proposed Project, so that any such party may fully participate in, interact with and inform the ESIA and RAP process. As a stakeholder, your involvement in the public participation process is vital and thus it is very important for us to maintain an open and inclusive channel of communication with you.

CES, on behalf of the EEC, have appointed MTK Sustainable Technologies, based in Manzini, to facilitate the public participation process throughout the ESIA and RAP process.

For more information, registration as an Interested and Affected Party (I&AP), or submission of written comments, please contact us as per the details provided below:

For more information, please contact:	To register as an I&AP, please contact:
Email: joseph.ncwane@eec.co.sz	Email: sustainable@mtkinvest.com
Postal: The Project Manager Network Reinforcement and Access Project Eswatini Electricity Company Eluvatsini House, Mhlambanyatsi Road Mbabane, Kingdom of Eswatini	Postal: Ms. Thobile Khumalo MTK Sustainable Technologies PO BOX 4019 Manzini
Tel: (+268) 2409 4000	Tel: (+268) 2505 8875
Cell: (+268) 7825 4223	Cell: (+268) 7868 3475

 Sustainable Technologies (Pty) Ltd

Figure 7: EISA Process poster



	NETWORK REINFORCEMENT AND ACCESS PROJECT	
RESETTLEMENT ACTION PLAN PROCESS		
LEGAL FRAMEWORK		
<p>The proposed location of the Project's substations and powerline route is will traverse private and communal land and is therefore expected to economically displace Project Affected Persons (PAPs). The objective of the Resettlement Action Plan (RAP) process is to ensure that all PAPs are compensated in accordance with the World Banks' ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and Eswatini's compensation guidelines including livelihood restoration as needed. Construction activities will not commence until all PAPs have been compensated according to the final and accepted RAP.</p>		
RAP APPROACH AND METHODOLOGY		
<p>The RAP process will include the following main tasks:</p>		
<p>1. Public Consultation 1: Initial Site Visit and RAP Planning - the first round of public consultation will be initiated during which the Project-Affected Communities (PACs) will be introduced to the Project and the envisaged scope of resettlement (economic displacement). Project background information documents (BIDs), posters, signage and various media notices will be released to ensure a wide reaching engagement is achieved.</p>		
<p>2. Household census and land surveys - with the use of local enumerators, a household-level socio-economic baseline survey (SEBS), as well as a landholding/asset inventory survey will be conducted along the Project route to gather baseline socio-economic data, asset inventory and land valuation.</p>		
<p>3. Public Consultation 2 - A second round of public consultation will be required in order to provide feedback to the PACs on the household census and land surveys, as well as to provide the scope of economic displacement. Again, various public and media announcements will be made to notify stakeholders.</p>		
<p>4. Establishing Resettlement Planning Committees - A Resettlement Planning Committee (RPC) will be established in each PAC to help facilitate the RAP process and to ensure inclusive representation of all PACs. Meetings will be held with each RPC during the RAP process.</p>		
<p>5. Drafting The Resettlement Action Plan And Livelihood Restoration Plan - the RAP will provide a compilation of all the data collected, and a detailed compensation valuation, entitlement framework and the proposed Livelihood Restoration Plan (LRP).</p>		
<p>6. Public Consultation 3: Draft RAP - a third public consultation will be required in order to disclose the Draft RAP. All PACs and relevant government authorities will be notified accordingly and given sufficient time to respond to invitations and notices, and comment on the draft documents.</p>		
<p>7. Compensation and Resettlement Planning - final discussions will be held with each PAC to confirm compensation rates, livelihood restoration measures required and discuss the RAP implementation process.</p>		
<p>8. Public Consultation 4: Final RAP disclosure and submission - A fourth public consultation will be required in order to disclose the Final RAP. Sufficient notice will be given to all PACs, government authorities, and local and traditional leaders about this public review. After disclosure, the RAP will be submitted for review and acceptance.</p>		
<p>9. RAP Implementation - Post disclosure and approval of the RAP, the implementation phase of the process can commence. This will include compensation through an appointed payment agent, stakeholder engagement and grievance management, and monitoring and evaluation throughout the implementation process.</p>		
<p>10. RAP Completion Reporting - On completion of all compensation payments and transitional support assistance to PAPs, CES will generate the required Completion Report for submission to the EEC and World Bank to verify that all deliverables of the RAP process have been met. The RAP process will also be externally audited by a third party on completion of the powerline construction works.</p>		
<p>For more information, registration as an Interested and Affected Party (I&AP), or submission of written comments, please contact us as per the details provided below:</p>		
<p>Email: sustainable@mtkinvest.com Postal: Ms. Thobile Khumalo MTK Sustainable Technologies PO BOX 4019 Manzini Tel: (+268) 2505 8875 Cell: (+268) 7868 3475</p>		
 Sustainable Technologies (Pty) Ltd		

Figure 8: RAP Process poster

ANEEX B: STAKEHOLDER ENGAGEMENT MINUTES AND REGISTERS

1. MINUTES OF INITIAL KEY STAKEHOLDER MEETINGS

1.1 MINUTES OF MEETING WITH NGWENYAMENI INNER COUNCIL (BANDLANCANE):

Date: 7 July 2020

Venue: Ngwenyameni umphakatsi Gogo centre

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Mkhwanazi. He indicated that the EEC team had visited them earlier to introduce the NRAP and was keen to hear about new developments with regards to the project.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that there line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo, representing the CES team. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.



Ms. Thandeka Dube presenting an overview of the project



Ngwenyameni community inner council following the presentation

Remarks by CES/MTK

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduct site assessments. The community will however be updated when the studies will be moving to the Ngwenyameni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

- Indvuna expressed concerns about homesteads that will be negatively affected by the project.

Response: Every effort has been made to avoid homesteads.

- There has been people visiting homesteads apparently from EEC; are these people known to the company?

Response: Some consultants have been in the area to survey the prosed alignment.

- The community were previously informed that this would be a World Bank funded project.

Response: That is still the intention.

- Which areas will workers be recruited from

Response: recruitment will be done in consultation with bandlancane as every effort will be made to recruit from within the community. Work on the studies will begin in August.

- Will EEC connections to homesteads in the community be cut off during project implementation? *Response:* There will be disruptions during the construction phase but these will be at scheduled times.

Bandlancane requested a copy of the map to take to the chief.

Conclusion

The chairman thanked the EEC for the project that is promising to solve their electricity supply issues in the region and indicated that they are looking forward to its implementation. Bandlancane undertook to select suitable candidates within a week and present names to EEC.

1.2 MINUTES OF MEETING WITH MAMPONDWENI INNER COUNCIL (BANDLANCANE)

Date: 7 July 2020

Venue: Mampondweni umphakatsi Gogo centre (Dlamini Chiefdom)

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Johhanise Lushaba. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlango substation
- Installation of a 132kv transmission line from Nhlango to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.



Remarks by Ms. Thobile Khumalo and Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduct site assessments. The community will however be updated when the studies will be moving to the Mampondweni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Comments by Inner Council

- The community would like to know exactly where the new line runs with reference to existing landmarks.

Response: Wherever possible the new line follows the path of existing line. Subsequent engagements will shed more light as they will zoom into how the line will run within the Mampondweni community

- What is the ideal age of the Community Liaison Officer?

Response: The key trait is that they should be energetic, the estimate would probably be mid-thirties.

- During this COVID times will these individuals get money for soap (i.e get paid)?

Response: Yes the CLO and the enumerator will be paid.

Closing

The chairman thanked the team for their visit and promised to send the name of the CLO and enumerator to EEC by the end of the following week (17 July 2020)

1.3 MINUTES OF MEETING WITH HHOHHO EMUVA INNER COUNCIL (BANDLANCANE)

Date: 8 July 2020

Venue: Hhohho Emuva umphakatsi

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Malani Ndwandwe. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlango substation
- Installation of a 132kv transmission line from Nhlango to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.





Remarks by Ms. Thobile Khumalo and Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start the in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Hhohho Emuva community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Comments/Remarks from inner Council

- The indvuna explained to the team that there are two centres to the Umphakatsi. It was felt that the meeting should be held at the more remote centre which tends to be neglected in terms of communications. As a result some of the bandlancane were not present as they assumed that the meeting would be held at the other centre. However, all information would be passed on to them at umphakatsi.
- Improved electrification is welcomed by all of the community and they will select a CLO and enumerator who will represent them well in the workplace as jobs are needed.

1.4 MINUTES OF MEETING WITH ZIKHOTHENI INNER COUNCIL (BANDLANCANE)

Date: 8 July 2020

Venue: Zikhetheni umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Mduduzi Vilane. He then gave the team an opportunity to make their presentation.

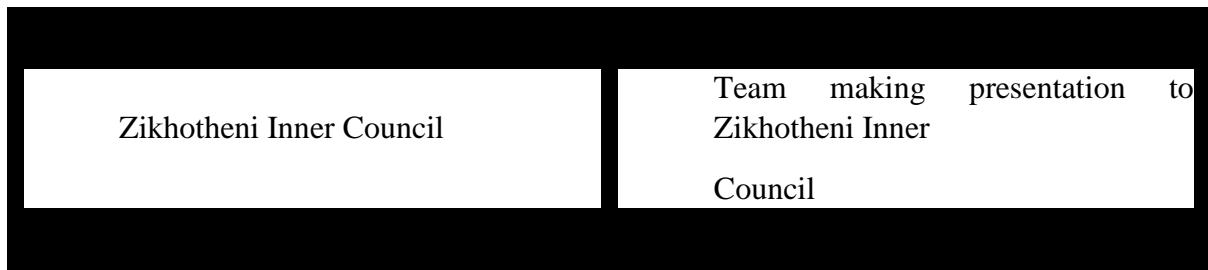
Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.





Remarks by Ms. Thobile Khumalo and Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Zikhetheni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Comments from inner council

- The transformer from Mhlosheni often goes offline. How will this be fixed?

Response: This is the purpose of the NRAP.

- Bandancane should call the community to introduce them to the consultant teams so that they are accepted by the community.
- When will work begin?

Response: The work will begin in early August that is why it is hoped that the names of the CLO and enumerator will be submitted next week.

- Why has the project chosen to go through Umpakatsi and not the inkhundla?

Response: Tinkhundla will also be engaged as part of the process of stakeholder engagement.

- This umphakatsi is very large so how will one enumerator manage?

Response: Enumerators are being recruited from all 11 communities to ensure equity among those affected.

The whole team will support each other as they move through the various communities.

1.5 MINUTES OF MEETING WITH MANYISENI INNER COUNCIL (BANDLANCANE)

Date: 8 July 2020

Venue: Manyiseni umphakatsi (Lushaba)

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Mlungisi Nxumalo. He then gave the introduced the team to the chief, Chief Bhejisa Lushaba, who also welcomed the team and gave them an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by Ms. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlango substation
- Installation of a 132kv transmission line from Nhlango to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where

environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between then community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.



Manyiseni Inner Council with Chief Bhejisa (on chair)

Remarks by Ms. Thobile Khumalo and Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start the in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Manyiseni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Remarks/Comments by chief

The chief⁷ stated that it takes time for anyone to fully understand a project therefore it will take many more visits before the community fully grasps the impacts. He noted that often developers work to fast and implement things without the approval of the community then it is too late to do anything to influence the project. At times such projects clash with the community's own development goals.

The chief would like the team to return with the engineers who were responsible for past projects. He stated that this visit means that in this project he felt there could be no blame as both sides are in communication so they are in it together. He stressed the need for consensus rather than coercion. The chief expressed concern at the pace of the project implementation.

It is important to know exactly how many and which homesteads may need to be resettled. The chief regularly meets with libandla on Saturday and will require a copy of the map as well as one that is more detailed.

1.6 MINUTES OF MEETING WITH MCHINSWENI INNER COUNCIL (BANDLANCANE)

Date: 8 July 2020

Venue: Mchinsweni umphakatsi gogo centre (Hlophe)

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Bhekizwe Dladlu. He introduced the team to the community and invited Ms. Thandeka Dube to make her presentation.

Presentation by EEC

The EEC was represented by Ms. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.





Remarks by Ms. Thobile Khumalo and Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start the in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Mchinsweni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumeration

team.

Remarks by Inner Council

The Indvuna explained that he thought the meeting was for the whole community hence the large turnout.

- What level of qualification is needed for the Community Liaison Officer and the enumerator?

Response: It must be understood that this is short term employment. A minimum of form 5 is expected as there will be some reading and writing required in English as well as Siswati.

- When are the candidates needed?

Response: Preferably names will be submitted to the EEC team next week.

- Some residents were left out of the electrification project in the community.

Response: It is hoped that all electricity schemes in the region will be improved as a result of the project.

- In the past there was an insistence that each household within a homestead should have its own connection.

Response: Illegal or multiple connections are discouraged for safety reasons.

- EEC placed poles within neighbours' homesteads and have said that it is up to the homeowner to pay for relocation of such poles.

Response: Such issues should be taken up at the depot as this briefing is only to deal with the NRAP.

1.7 MINUTES OF MEETING WITH MAPLOTINI INNER COUNCIL (BANDLANCANE)

Date: 9 July 2020

Venue: Maplotini umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Matsenjwa. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlangoano substation
- Installation of a 132kv transmission line from Nhlangoano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representative, Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between then community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.

Remarks by Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Maplotini community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Remarks and comments from Inner Council

Indvuna apologised for the absence of some of the council members as there was some confusion between the day and the date of the meeting.

- The community requests that the project does not bring workers from far away during the construction

phase as people in the community need employment.

Response: EEC hoped to work closely with bandlancane and the CLO to ensure local participation in all aspects of the project.

- Who is expected to select the candidates between bandlancane and bandlakhulu

Response: It is assumed that bandlancane are the rightful representatives of the whole community.

1.8 MINUTES OF MEETING WITH VIMBIZIBUKO INNER COUNCIL (BANDLANCANE)

Date: 9 July 2020

Venue: Vimbizibuko umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Mzingeli Phakathi. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representative, Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.

Remarks by Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The

community will however be updated when the studies will be moving to the Vimbizibuko community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Remarks/Comments by Inner Council

- To whom are names of candidates submitted

Response: Thandeka Dube who will be in contact next week.

- Do these candidates have to have formal education and if so, at what level?

Response: The enumerator must have completed high school. It would also be easier if the CLO has some schooling as he will sometimes be dealing with English speakers and may have to read and write forms.

- What happens if the environment is disturbed?

Response: If disturbance is unavoidable, mitigation measures will be put in place in consultation with those affected.

- When will work begin?

Response: Studies will start at the beginning of August.

- What happens if the line runs directly through a homestead?

Response: Every effort has been made to avoid homesteads as resettlement is disruptive and expensive.

Where it is impossible to divert the line, a form of compensation will be agreed between the parties.

1.9 MINUTES OF MEETING WITH NKONKA INNER COUNCIL (BANDLANCANE)

Date: 9 July 2020

Venue: Nkonka umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Magodlusuthu Myeni. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representative, Ms. Sindi Nxumalo.

She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.

Remarks by Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Nkonka community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Comments/Remarks by Inner Council

- What level of education is expected of the CLO and the enumerator?

Response: They will have to read and write some forms in English.

- Bandlancane anticipates more employment opportunities for the community.

Response: The project will rely on umphakatsi to assist with recruiting the most reliable candidates.

- Bandlancane needs to be involved in the studies.
- The community was originally told the project would begin in March last year.
- People start planting in August / September so they need to know whose fields are affected.

Response: The project will try to stick to the present alignment to avoid fields.

- It sometimes happens that powerful electricity lines can affect nearby homes.

Response: The level of such disturbance will be measured and avoided wherever possible.

1.10 MINUTES OF MEETING WITH KWALUSENI INNER COUNCIL (BANDLANCANE)

Date: 9 July 2020

Venue: Kwaluseni umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Mduduzi Vilane. He then gave the team an opportunity to make their presentation.

Presentation by EEC

The EEC was represented by MS. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlanguano substation
- Installation of a 132kv transmission line from Nhlanguano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representative Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.



Remarks by Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Kwaluseni community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Comments/Remarks from Inner Council

- Will those that work with the study team get paid or will it be considered 'kuHlehlala'⁸?
Response: These are short term assignments for which there is payment.
- Are those who graduated from high school many years ago eligible?

Response: As long as candidate have for 5 and good English. Even during construction priority for unskilled labour will be given to locals.

Bandlancane thanked the team for giving them the opportunity to decide on candidates so they can think it through and select the right people.

1.11 MINUTES OF MEETING WITH MABONABULAWE INNER COUNCIL (BANDLANCANE)

Date: 16 July 2020

Venue: Mabonabulawe umphakatsi Gogo Centre

Present: Please see attached attendance register

Meeting Objectives

1. To reintroduce the NRAP project to inner council communities that may be impacted
2. To update and introduce the ESIA and RAP team and studies to communities
3. To solicit project, buy in from communities

Introduction

The team was welcomed by the chairman and Indvuna Elphas Nkwanyana. He then gave the team and gave them the opportunity to make their presentation.

Presentation by EEC

The EEC was represented by Ms. Thandeka Dube, the Social Standards Officer. She indicated that the EEC had obtained a loan from the World Bank to strengthen the supply of electricity in the Shiselweni region through then NRAP. She outlined the components of the project as follows:

- Expansion of the Nhlangano substation
- Installation of a 132kv transmission line from Nhlangano to Lavumisa
- Upgrading of Hluthi Switch yard, and construction of new substations for Matsanjeni and Lavumisa
- Strengthening of electricity distribution to communities

She presented the proposed alignment of the 132 kV transmission line and indicated that the line may impact on some community members' properties. She indicated that the project preparation is now at a stage where environmental studies will commence. She then introduced the ESIA and RAP team representatives, Ms Thobile Khumalo and Ms. Sindi Nxumalo. She requested the community to assist the project by appointing a community liaison officer (CLO) who will assist in the communication between the community and the project. She outlined the general qualities for the CLO: Trustworthy, energetic and sober.



Remarks by Sindi Nxumalo

They thanked the community for receiving them. Indicated that EEC has appointed the team to conduct ESIA and RAP studies and that the proposed plan is to start in the beginning of August 2020. She indicated that the process will involve meetings with community groups, door to door surveys and conduction site assessments. The community will however be updated when the studies will be moving to the Mabonabulawe community. Ms. Nxumalo requested the community to select an intelligent and computer literate individual who will be part of the enumerator team.

Remarks/Comments by Inner Council

- Will those that work with the study team get paid or will it be considered 'kuHlehl'a⁹?

Response: These are short term assignments for which there is payment.

- Are those who graduated from high school many years ago eligible?

Response: As long as candidate have for 5 and good English. Even during construction priority for unskilled labor will be given to locals.

Bandlancane thanked the team for giving them the opportunity to decide on candidates and promised to submit the names of the appointed CLO and enumerator by the end of the following week (24 July 2020).

2. IMPLEMENTATION STAKEHOLDER ENGAGEMENT MINUTES

2.1 RAP Sensitization, grievances addressing, and customer education meeting held in all 13 communities benefiting and affected by the project minutes are attached below:



NRAP Stakeholder
Engagement Meeting

2.2 GBV Awareness sessions and refresher sessions with focus on women only for communities under Component 1a and 2 minutes are attached below:



GBV Sensitization
Meetings Minutes .pd

Report 1: NRAP GBV/SEA/SH Awareness and refresher sessions

1. Registers

1.1 GBV Sessions registers



GBV Awareness Session v2.pdf



GBV Awareness Registers v1.pdf



2 GBV Awareness Sessions - Women an



GBV Awareness Sessions - Women an

1.2 Stakeholder engagement with affected communities on RAP update. This include introductory meetings for all Consultants and contractor workers that have been engaged in the project



RAP Stakeholder Engagement Meeting:



NRAP Stakeholder Engagement Meeting

1.3 Inductions for Contractor workers



Contractor Induction Registers.pdf



Contractor GBV Refresher Trainings R



3 Inductions for Survey contractor's re



2 Inductions for Survey contractor's re



Inductions for Survey contractor's register -



iN.pdf

1.4 RAP Meetings/trainings registers



RAP Workshop Mission Register - 28



Nkonka Register 5- April 2022.pdf



Nkonka Register 3- April 2022.pdf



Nkonka Register - April 2022.pdf

1.5 RAP Disclosure meeting register



RAP Disclosure & Compensation Negoy



RAP Disclosure & Contract Negotiation



Simelane Household Meeting Minutes Nov



SKM_C300i22112907 430.pdf

1.5.1 RAP disclosure with Regional and traditional authorities



Traditional Leadership Meetings.

1.6 SHE reps meeting registers



SHE REPs meeting register - May 22.pdf

ANNEX C: STAKEHOLDER ENGAGEMENT REPORTS AND TOOLS

1. GBV/SEA/SHE Reports and Tools



Simplified SODV English (1).pdf



Simplified SODV SiSwati (2).pdf



NRAP GBV-SEA-SH Assessment Report -

Report 2: NRAP GBV/SEA/SH Assessment report

Figure 9: SODV as a GBV tool used for the NRAP

2. RAP Reports and Tools



EEC_NRAP
RAP_Appendix A_Engag

Report 3 RAP Engagements report



EEC_NRAP
RAP_V2_Clean_2022.09

Report 4: NRAP RAP Disclosed 092022

3. Inductions tools



Contractor GBV
Refresher Training Ev

4. Accommodation inspections tools



Accommodation
Inspection Report Ter