

ESWATINI ELECTRICITY COMPANY



STAKEHOLDER ENGAGEMENT PLAN FOR NETWORK REINFORCEMENT AND ACCESS PROJECT

Project ID no: P166170

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TABLE OF CONTENTS

1. INTRODUCTION.....	3
1.1. Overview	3
1.2. Stakeholder Engagement Plan (SEP)	4
1.3. Regulations and requirements	4
Statute and Regulations	4
2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT	4
2.1. What is Stakeholder Engagement?	4
2.2. Principles for Effective Stakeholder Engagement	5
2.2.1. Stakeholder Engagement Considerations	5
2.3. Stakeholder Identification	6
2.4. Stakeholder identification and consultation methods	7
2.5. Stakeholders identified	8
2.5.1. Stakeholder Government Ministries	8
2.5.2. Stakeholder Parastatals/Agencies	10
2.5.3. Stakeholder Communities.....	12
2.5.4. Non-governmental Organizations (NGOs) stakeholders	12
2.6. STAKEHOLDER ENGAGEMENT OBJECTIVES AND PRINCIPLES	14
2.6.1. Communal objectives	14
2.6.2. Operational objectives	14
2.6.3. Key principles	15
2.7. STAKEHOLDER ENGAGEMENT ACTIVITIES	15
2.7.1 Considerations for the Engagement Process	26
2.8. Culturally appropriate engagement.....	26
2.9. Monitoring Stakeholder Engagement Activities	27
2.9.1 Review of Engagement Activities in the Field:.....	27
2.9.2 Reporting Stakeholder Engagement Activities	28
3. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE	28
3.1. Stakeholder Engagement and Project Cycle.....	28
4. SEP Resources and Responsibilities	29
4.1. Resources	32
4.1.2 Training.....	32
4.1.3 Budget	32
5. GRIEVANCE MECHANISM.....	33

5.1. Definitions and Grievance Procedure	33
5.2. Grievance Redress Process	34
5.3. Community Level Grievance Redress Mechanism	34
5.4. Project Level Grievance Redress Mechanism.....	35
5.5. Judiciary Level Grievance Redress Mechanism.....	37
6. MONITORING AND REPORTING	38
6.1 Review of Engagement Activities in the Field	40
6.2 Reporting Stakeholder Engagement Activities	40
REFERENCES	41
ANNEXURES	42
ANNEX I: INITIAL STAKEHOLDER ENGAGEMENT MEETING REPORT	42

LIST OF TABLES

Table 1: Stakeholder Engagement Techniques	7
Table 2: Stakeholder Government Ministries	9
Table 3: Stakeholder Parastatals/Agencies.....	10
Table 4: Stakeholder Engagement Activities.....	16
Table 5: Stakeholder Engagement Communication Plan	21
Table 6: Communication Channels	26
Table 7: Grievance Redress Process at Project Level	37
Table 8: Key Performance Indicators by Project phase	38

LIST OF FIGURES

Figure 1: Project Map.....	3
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1. INTRODUCTION

1.1. Overview

This document is the Stakeholder Engagement Plan (SEP) for the Network Reinforcement and Access Project (the NRAP, referred to hereinafter as “the Project”).

The Government of the Kingdom of Eswatini intends to apply for a loan from the World Bank's International Bank for Reconstruction and Development (IBRD) to finance the proposed Network Reinforcement and Access Project (NRAP), hereinafter referred to as “the Project”.

The proposed development objective of the Project is to “Improve the quality and reliability of electricity supply and increase access in the Shiselweni region of Eswatini”. The project seeks to: (i) reduce transmission system interruptions; (ii) reduce distribution system interruptions; and (iii) increase the number of households provided with electricity. As part of preparation for the Project, Eswatini Electricity Company (EEC) is required to undertake and complete an Environmental and Social Impact Assessment (ESIA) in accordance with the Eswatini Environment Act No. 5 of 2002, the World Bank Environmental and Social Framework (ESF)¹ and the World Bank Group Environmental, Health and Safety Guidelines for Electric Power Transmission and Distribution.

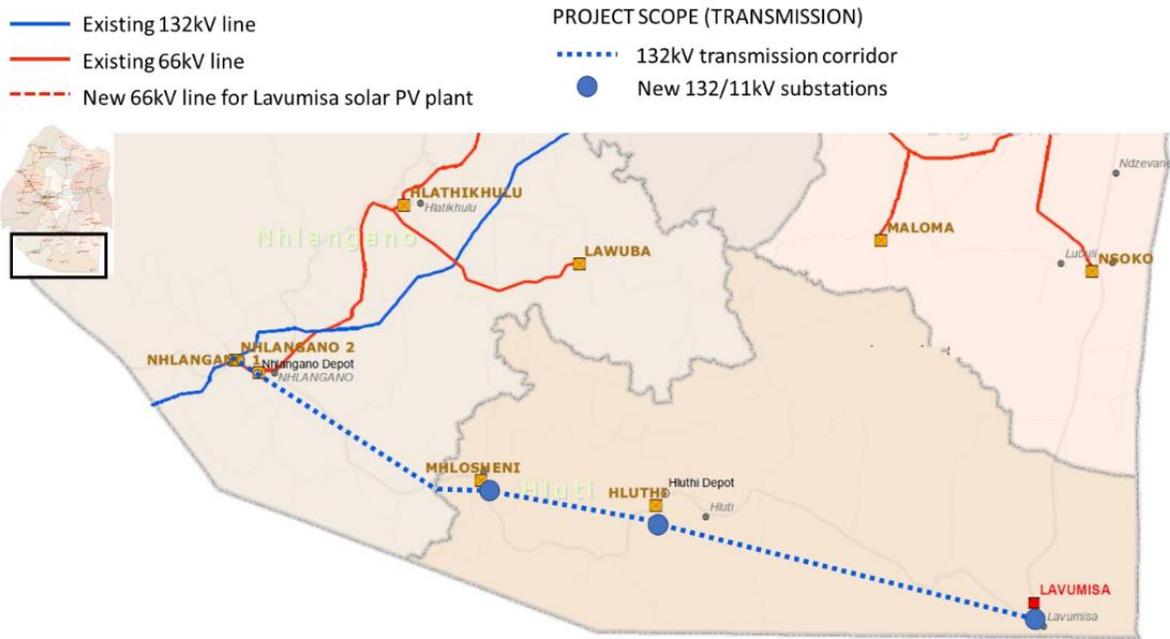


Figure 1: Project Map

¹ <http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

1.2. Stakeholder Engagement Plan (SEP)

The SEP seeks to define a technically and culturally appropriate approach to consultation, disclosure and grievance redress. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions. The SEP is a useful tool for managing communications between EEC and its stakeholders.

The Key Objectives of the SEP can be summarised as follows:

- Understand the stakeholder engagement requirements of the Kingdom of Eswatini legislation;
- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice;
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Develops a stakeholders engagement process that provides stakeholders with an opportunity to engage in project planning and design and its implementation;
- Establish formal grievance/resolution mechanisms;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

1.3. Regulations and requirements

Statute and Regulations

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

- Environmental Management Act, 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

2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT

2.1. What is Stakeholder Engagement?

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of 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.

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

- **Managing costs:** Effective engagement can help project EEC avoid costs, in terms of money and reputation;
- **Managing risk:** Engagement helps project EEC and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- **Enhancing reputation:** By publicly recognising 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;
- **Avoiding conflict:** Understanding current and potential issues such as land rights and proposed project activities;
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in EEC corporate practices and policies;
- **Identifying, monitoring and reporting on impacts:** Understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for EEC to become aware of and manage stakeholder attitudes and expectations.

2.2. 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:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process;
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognised;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community’s beliefs, values and opinions.

2.2.1. Stakeholder Engagement Considerations

The following considerations shall be made when planning for stakeholder engagement:

Time and resources:

It takes time to develop and build trust based relationships with stakeholders. The consensus from practitioners is that from the outset relationships with stakeholders should develop and grow, and that these relationships should be nurtured and fostered not to fade.

Additional stakeholders might be identified that also want to be engaged. No willing stakeholder should be excluded from the process of engagement. Some stakeholders will need to be educated about the concept of engagement itself, as well as on the complex issues requiring specialised and technical knowledge. These demands can increase the cost of consultation required to meet external expectations, and often this occurs at a time when a project lacks the internal capacity and resources to implement a broad engagement strategy.

It raises expectations:

Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such EEC from the outset shall be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities.

In Eswatini, the engagement processes shall provide EEC with an opportunity to develop relationships with stakeholders and potential project partners who can assist with implementing corporate social responsibility projects.

Securing stakeholder participation:

Cultural norms and values can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This shall be avoided by employing local consultants who are sensitive to local power dynamics, which will require project proponents to develop an awareness of the local context and implementing structures to support and foster effective stakeholder engagement.

Consultation fatigue:

Moreover there is evidence to suggest that stakeholders can easily tire of consultation processes especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives are not improving as a result of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This shall be avoided by coordinating stakeholder engagement during the ESIA process, and by ensuring practitioners do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the client and other project specialists.

2.3. Stakeholder Identification

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. This information shall then be used to tailor engagement to each type of stakeholder. As part of this process it will be particularly important to identify individuals and groups

who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalised or vulnerable status.

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

Stakeholders have been and will continue to be identified on a continuing basis by identifying:

- Various stakeholder categories that may be affected by, or be interested in, the Project; and
- Specific individuals, groups, and organizations within each of these categories taking into account:
- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected;
The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

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 increases, engagement with that particular stakeholder group shall intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement shall proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

2.4. Stakeholder identification and consultation methods

There are a variety of engagement techniques that shall be used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group shall be considered. The technique mostly used in Eswatini are:

Table 1: Stakeholder Engagement Techniques

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders

	Disseminate technical information Record discussions
Public meetings	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.
Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses
Project website	Present project information and progress updates Disclose ESIA, ESMP, RPF and other relevant project documentation
Direct communication with affected crops/asset owners (Road component only)	Share information on timing of road clearance Agree options for removing crops and relocation of fences.
Road signs	Share information on project activities Reminders of potential impacts (e.g. for road clearance activities; remind crop owners to harvest crops and replant outside the road reservation)
Project leaflet	Brief project information to provide regular update Site specific project information.

2.5. Stakeholders identified

2.5.1. Stakeholder Government Ministries

Engagement with government will serve two main purposes:

- (i) Involve the ministries, departments and committees in each step of the Project to build consensus and ownership; and
- (ii) Identify the governance framework for socio-economic development and environmental management.

Table 2 shows the potential role, interest and influence of each of the target audiences captured in the Project in as far as the mandate, history of involvement, resources and authority in development planning and decisions making are concerned.

Table 2: Stakeholder Government Ministries

Government			
Stakeholder	Involvement in the project	Interest	Influence
<ul style="list-style-type: none"> • Ministry of Natural Resources and Energy • Ministry of Finance • Ministry of Health • Deputy Prime Minister's Office 	<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 • Provide oversight and control of disbursement project funds to the implementing agency. Monitor compliance of financial reporting of project funds by the implementing agency • Public Health Section shall assist with educating project stakeholders on health issues such as prevention of HIV • The Gender Department and Family Issues Assists with policies regarding vulnerable people and educating stakeholders about the legislation for preventing occurrence of gender based violence (GBV). <ul style="list-style-type: none"> • The National Children's Coordinating Unit (NCCU) Evaluate and review all existing National Legal instruments governing the treatment of children to ensure compliance with International children treatment standards, provisions and practices. Monitor and evaluate all National children, policies, plans & Programs and ensure that all stakeholders collaborate and contribute towards a National Children Development agenda • Department of Social Welfare develop, facilitate and monitor the implementation of effective policies and strategies on integrated social welfare services that meet the needs of all vulnerable groups. Implement comprehensive social welfare services focusing on all vulnerable groups. (families, older persons, disabilities, children, Ex-servicemen, substance abuse people, persons affected with HIV/AIDS) • National Disability Unit within the Department of Social Welfare is 	High	Medium

	currently responsible for the coordination of interventions for Persons with Disabilities.		
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2.5.2. Stakeholder Parastatals/Agencies

Table 3: Stakeholder Parastatals/Agencies

Government parastatals/agencies			
Stakeholder	Potential Involvement in the project	Interest	Influence
Eswatini Environmental Authority (EEA)	<ul style="list-style-type: none"> • Have the overall oversight and responsibility of ensuring compliance to environmental and social regulations by all organisations, 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 authorisation prior to implementation of certain components of the project. Furthermore, EEA will frequently carry out inspection of the project implementation process to ensure compliance to the environmental and social regulations. 	High	High
Eswatini National Trust Commission (ENTC)	<ul style="list-style-type: none"> • To be consulted on sensitive areas of nature conservation such as game reserves, heritage sites, etc. that the Project may affect. 	Medium	Low
Town Board of Nhlanguano	<ul style="list-style-type: none"> • The overriding institution in the Nhlanguano 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. 	High	High
Eswatini Energy Regulatory Authority	<ul style="list-style-type: none"> • 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 (ESI) and regulation of 	High	High

	<p>generation, transmission, distribution, supply, use, import and export of electricity in Eswatini.</p> <ul style="list-style-type: none"> • The Authority will provide information and guidance in resolving land disputes between parties affected by Project. 		
Shiselweni 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. <p>Throughout the project life-cycle, the Shiselweni Regional Administrator will be involved in the following when the need arises:</p> <ul style="list-style-type: none"> • Facilitate resolution of community conflicts and land disputes in the Chiefdoms • Facilitate and monitor the implementation of the Project. 	High	High
Traditional Authorities <ul style="list-style-type: none"> • Chiefs • Community Liaison Officers 	<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. • Liaison Officers will be selected from each chiefdom to be a link between the community, chief and EEC. 	High	High
Eswatini Royal Police Service	<ul style="list-style-type: none"> • They are responsible for keeping law and order. 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. • The Eswatini Police has a department that is 	Medium	Medium

	dedicated to address this kind of reports, making it a safe and fully capable environment to deal with Gender Based Violence cases.		
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2.5.3. Stakeholder Communities

For the Transmission Line component only, there will be a need to communicate directly with owners of crops and fences who will be affected by clearance of the servitude. It is not possible to identify these individuals at this stage, but the Contractor will be responsible for preparing a communication plan to discuss potential impacts and agree timing for Transmission clearance activities. However, communication on the timing of works is a crucial component of minimizing impact to crop/fence owners.

The transmission line will cross communal land and smallholder farms; land used for grazing and subsistence farming, which is under traditional governance. The area is rural in nature and the population density is low, with scattered settlements and homesteads. Therefore, while the transmission line traverses a significant distance, the relative impact is anticipated to be moderate.

Furthermore, local communities might be affected during the construction of the distribution line. However, the extent can only be determined at a later stage of the project

A provisional list of affected communities has already been compiled based on the selected sites and area of impact and an Initial Stakeholder Engagement meeting has been held with these Chiefdoms (**Annex I**). The project affected communities will come from the following chiefdoms:

- Mampondweni under Chief Sibasani
- Ngwenyameni under Chief Magoloza
- Zikhoteni under Chief Zwide II
- Hohhohho Emuva under Chief Salebona
- Mabonabulawe under Chief Ndabankulu
- Manyiseni under Chief Bhejisa
- Kwaluseni Mgamudze under Chief Gasas
- Mchinsweni under Chief Mahange
- Nkonka under Chief Gasas
- Maplotini under Chief Gasas
- Vimbizibuko under Chief Gasas

2.5.4. Non-governmental Organizations (NGOs) stakeholders

This project will affect groups in the communities. These stakeholders will provide information and guidance to ensure that marginalized groups in the communities are considered and involved in the project implementation.

- **Swaziland Action Group Against Abuse (SWAGAA)** - is a non-governmental organization that has been working for almost 30 years to end gender-based violence (GBV), sexual abuse and human trafficking in Eswatini (formerly Swaziland). As the lead organization framing the agenda on GBV, SWAGAA partners with key stakeholders to provide technical expertise on

best practices in GBV prevention and response. Furthermore SWAGAA takes a leading role in educating and enforcing the Child Protection and Welfare Act 2012. SWAGAA plays a major role as the first contact and driving investigations of child abuse issues in collaboration with the Eswatini Royal Police Service to prosecute offenders and provide counselling to victims and assist victims to obtain safe living conditions and follow up on the progress of recovering victims

- **Coordinating Assembly for NGO's (CANGO)** - The Coordinating Assembly of Non-Governmental Organisation commonly referred to as CANGO was established in 1983 primarily as a network for NGOs working in Primary Health Care in Swaziland, then in 1987 assumed the overall Coordinating body for the Non-Governmental Organisations in the country.. The core mandate is to facilitate coordination of the NGO sector, building capacity of its members to fulfil their organizational-specific mandates, and to influence national and international policies through advocacy.
- **The National Emergency Response Council on HIV and AIDS (NERCHA)** - to coordinate and facilitate the National Multi-sectoral HIV/AIDS response and oversee the implementation of the national strategic plans and frameworks. NERCHA is not an implementing body, its goal is rather to organize and manage the nation's war against the AIDS epidemic. Acting as the conduit for monies received from Government and the U.N. Global Fund to Fight HIV/AIDS, Tuberculosis and Malaria, NERCHA works with organizational and community partners across all sectors to ensure that comprehensive services are delivered at the grass-roots level throughout the nation
- **Nhlangano AIDS Training Information and Counselling Centre (NATIC)** - will assist with training of communities and workers on available programs for prevention of HIV, counselling and testing for HIV. They will further ensure that information about national initiatives on HIV is disseminated at community level working closely with NERCHA
- **Women and Law in Southern Africa-Swaziland (WLSA)** – Educate people on the provisions of the Sexual Offences and Domestic Violence Act of 2018 to combat and prevent the occurrence of gender based violence (GBV) related to the project.
- **FODSWA** – is the umbrella body for all associations of Persons with Disabilities which works closely with the National Disability Unit (NDU) in the Deputy Prime Minister's Office whose mandate is to work with persons with disabilities, including those with long-term physical, mental, intellectual or sensory impairments. In particular, its mission is to champion significant improvement in the quality of their life and to collaborate with organizations representing Persons With Disabilities in promoting and supporting disability issues, to raise public awareness, to promote measures to prevent disabilities, to conduct relevant trainings (sign language and Braille communication) and to implement the national disability policy in line with the UN Convention on the Rights of Persons With Disabilities.

2.5.5. Vulnerable/Disadvantaged Groups Stakeholders

It is likely that project-affected parties in the communities will include vulnerable /disadvantages groups. At this stage these groups have not yet been determined, however, they will be identified after the ESIA exercise. Vulnerable /disadvantages groups are community members likely to be affected by the project but may have difficulty in engaging with the stakeholder consultation process and thus may not be able to fully express their concerns regarding the proposed Project.

Particular attention will be paid to adverse impacts on Vulnerable/ disadvantaged groups who, because of their social position, may be vulnerable to changes brought about by project activities or excluded from project benefits. This group is likely to include the following:

- physically disabled
- women-headed households
- child/orphan-headed households
- households below the poverty line, and
- The youth

Discussions with the vulnerable/disadvantaged groups affected by the Project aim to provide opportunities for ground investigation on potential social impacts as a result of the construction of the transmission line, distribution line and associated substations in the Shiselweni Region.

To ensure that consultation with local communities is inclusive of disadvantaged groups, presentations will be conducted in siSwati because many community members may be illiterate. Where necessary, additional formats such as location sketches will be used to enhance understanding. The assistance of community leaders will be needed to encourage effective representation of Vulnerable /disadvantages groups in group discussions throughout the project phases.

2.6. STAKEHOLDER ENGAGEMENT OBJECTIVES AND PRINCIPLES

The SEP has three corporate objectives, a number of project-specific operational objectives, and key principles. The stakeholder engagement programme will aim to achieve the objectives and comply with the principles.

2.6.1. Communal objectives

The corporate objectives of stakeholder engagement are

- A coordinated approach to all engagement actions;
- Consistency of messaging;
- Management of stakeholder expectations; and
- Reduction in the potential for delays in future project-related decision-making for issue of project approvals and permits or the need for costly redesign of operations/facilities.

2.6.2. Operational objectives

The operational objectives of stakeholder engagement are:

- Acquisition of information from certain stakeholders to assist preparation of the ESIA report;
- Provision of information on NRAP and the ESIA to stakeholders;
- Ensuring that stakeholders have an understanding of how they might be affected and their potential role in NRAP implementation and impact management;
- Provision of opportunities for stakeholders to express their opinions and concerns in relation to the ESIA and NRAP and for these opinions and concerns to be taken into account in the ESIA and NRAP -related management decisions; and

Ensuring that stakeholders understand EEC's corporate and operational aims and requirements, with respects to NRAP, and have confidence in EEC's ability to manage environmental/social risks in a responsible and transparent manner

2.6.3. Key principles

The SEP will ensure that the following key principles are applied to all engagement activities:

- Timing and number of engagement events designed to maximise stakeholder involvement and to avoid disruption to the 'daily business' of local stakeholders and also stakeholder 'fatigue';
- A senior EEC staff member to be present and participate actively at all engagement events;
- Engagement events to occur in line with the SEP schedule so that there is clear linkage between engagement activities and the key stages in the ESIA assessment process;
- Ensure that engagement is managed so that it is culturally appropriate, adequate and timely information and opportunities are provided to all stakeholders to be involved/contribute; and
- Ensure that engagement is free from coercion, undertaken prior to key decisions and informed by provision of objective and meaningful information, and that feedback is provided to stakeholders after engagement has concluded.

EEC employs a protocol governing all stakeholder engagement activities. No interaction with any stakeholder related to the ESIA and NRAP can be undertaken without the EEC's permission.

2.7. STAKEHOLDER ENGAGEMENT ACTIVITIES

All stakeholder engagement activities will be informed by and regularly updated according to an iterative process of stakeholder identification, analysis and mapping and based on comments received on the stakeholder engagement process.

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

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

- **Ensuring understanding:** An open, inclusive and transparent process of culturally appropriate engagement and communication to ensure that stakeholders are well informed about the proposed. Therefore, whenever information is disseminated, the siSwati language will be considered to ensure full understanding of communication.
- **Involving stakeholders in the assessment:** Stakeholders will be included in the scoping of issues, the assessment of impacts, the generation of mitigation and management measures and the finalisation of the ESIA reports. They will also play an important role in providing local knowledge and information for the baseline to inform the impact assessment.

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

Table 4: Stakeholder Engagement Activities

Stage	Objective	Key Activities	Target Stakeholder
Preliminary Engagements	<ul style="list-style-type: none"> • To gain a preliminary understanding of the scope of the Project, appropriate and legislated engagement requirements and relevant stakeholders. 	<ul style="list-style-type: none"> • Field visit; and • Stakeholder identification process. 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups

Stage	Objective	Key Activities	Target Stakeholder
Scoping Engagement	<ul style="list-style-type: none"> • To meet key stakeholders and introduce them to the Project and ESIA Process; • To disclose the Project in the public domain to all interested and affected stakeholders; • To gather issues of concern and through this identify a list of potential impacts; • To consult key stakeholders on the next steps in the ESIA process; • To generate feedback on the Draft Scoping Report, including the scope, approach and key issues to be investigated further for the ESIA. 	<ul style="list-style-type: none"> • Meetings with key stakeholders to facilitate the broader stakeholder engagement process • Dissemination of engagement materials (background information document, posters, media notices etc.) • Consultation on the proposed Project and associated ESIA through meetings and workshops with identified stakeholders. Details may include: <ul style="list-style-type: none"> ○ Nature, purpose and scale of the proposed project ○ ESIA & stakeholder engagement process • Confirmation of issue identification and feedback from stakeholders; 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups • Non-government organizations (NGOs);
ESIA Disclosure	<ul style="list-style-type: none"> • To discuss the identified impacts and proposed mitigation measures with stakeholders allowing for their input; and • To provide stakeholders with the opportunity to comment on the Draft ESIA report. 	<ul style="list-style-type: none"> • Dissemination draft ESIA Report to all stakeholders. • Copies of the ESIA report will also be distributed in public buildings in the vicinity of the site of the proposed project. • Availability of the draft ESIA Report will be advertised through print and electronic media for public review. • Consultation on the draft Impact Assessment Report. This will include: <ul style="list-style-type: none"> ○ Identification of impacts in the draft ESIA and proposed mitigation; ○ Identification of stakeholder concerns and opinions on the impacts identified; ○ Involvement of stakeholders in assessing the efficacy and appropriateness of the proposed mitigation measures; and 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups • Business Community • Contractors & Contract Workers • Non-government organizations (NGOs);

Stage	Objective	Key Activities	Target Stakeholder
		<ul style="list-style-type: none"> ○ Identification of revisions or additions to the draft ESIA report where necessary. 	
Formal Submission of Final ESIA	<ul style="list-style-type: none"> • Submission of final ESIA Report with comments incorporated from the ESIA engagement and disclosure stage 	<ul style="list-style-type: none"> • Submission of the Final ESIA for approval. 	<ul style="list-style-type: none"> • World Bank

Stage	Objective	Key Activities	Target Stakeholder
Resettlement Policy Framework (RPF) disclosure and stakeholder consultation	<ul style="list-style-type: none"> To share draft policy framework based on national legislations, current practices in the country and Environmental and Social Standards of the Bank and finalised based on feedback and inputs 	<ul style="list-style-type: none"> Dissemination draft RPF to all stakeholders. Copies of the RPF will also be distributed in public buildings in the vicinity of the site of the proposed project and uploaded on EEC website. Availability of the draft RPF Report will be advertised through print and electronic media for public review. Consultation on the draft RPF. This will include: <ul style="list-style-type: none"> Identification of impacts categories based on preliminary survey report and possible entitlements and eligibility criteria; Key principles of resettlement and broad institutional arrangement. Identification of stakeholder concerns and opinions on the contents of the RPF; Involvement of stakeholders in assessing the appropriateness of the proposed resettlement principles, impact categories, entitlements; institutional arrangement for preparation and implementation of RAP. Assess adequacy of RPF during ESIA and RAP preparation Identification of revisions or additions to the draft RPF where necessary. 	<ul style="list-style-type: none"> Government Government parastatals/agencies Local/project affected communities Vulnerable/disadvantaged Groups Business Community Royal Krals and Chiefs Regional administration office Non-government organizations (NGOs);

<p>Resettlement Action Plan (RAP) disclosure and stakeholder consultation</p>	<ul style="list-style-type: none"> • To share draft RAP based on RPF and specific impact area as per designs subsequently finalise based on feedback and inputs 	<ul style="list-style-type: none"> • Dissemination of cut off date and census survey of all affected through structured questionnaire • FGDs and community level meetings facilitated by Chiefs and Community Liaison Officers • Dissemination of draft RAP to all stakeholders. • Use of Leaflets on non technical summary of RAP and folk media for the project affected • Copies of the RAP will also be distributed in public buildings in the vicinity of the site of the proposed project and uploaded on EEC website. • Availability of the draft RAP Report will be advertised through print and electronic media for public review. • Consultation on the draft RAP. This will include: <ul style="list-style-type: none"> ○ Identification of impacts categories based on specific impact area based on designs, entitlements and eligibility criteria; Key principles of resettlement and specific institutional arrangement for implementation and GRM. ○ Identification of project affected concerns and opinions on the identified impacts, RAP implementation Plan and project schedule; ○ Involvement of stakeholders in assessing the appropriateness of the identified impacts, list of PAPs , entitlement options; institutional arrangement for implementation of RAP and GRM. 	<ul style="list-style-type: none"> • Project affected Persons • Other project affected communities • Vulnerable/disadvantaged Groups • Business Community • Royal Krals and Chiefs • Regional administration office • Non-government organizations (NGOs);
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Stage	Objective	Key Activities	Target Stakeholder
		<ul style="list-style-type: none"> Identification of revisions or additions to the draft RAP where necessary. 	

Table 5: Stakeholder Engagement Communication Plan

Stakeholder	Communication	Method of Engagement	When
Ministry of Natural Resources and Energy	Project Concept Note Preparation Field Missions Project Approval and Contracting Electrification instructions and verifications Progress Reports Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	End of June 2019 Monthly
Ministry of Finance	Project Concept Note Preparation Field Missions Project Approval and Contracting Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	End of July 2019 Monthly
Ministry of Commerce	Discussion on future plans of commercial and industrial development Implementation steering committee progress reports Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	May 2019 Frequency yet to be determined

Ministry of Health	Project brief Discussion with the related department on issues of health relevant to the project. Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	Once Off Yearly
Deputy Prime Minister's Office	Project brief Disseminate technical information Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	Frequency yet to be determined
Ministry of Tourism and Environmental Affairs	Project brief Disseminate technical information Record discussions	-Formal meetings -Email -Posters -Press Statements -Project brief document	Frequency yet to be determined
Ministry Works and Transport	Project brief Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Site visits	-Formal meetings -Email -Posters -Press Statements -Project brief document	Frequency yet to be determined
Eswatini Environmental Authority (EEA)	Project Brief and request for categorization Site visits Periodic compliance reports	-Formal meetings -Email -Site visits -Posters -Press Statements -Project brief documents	January 2019 May 2019 September 2019 Monthly

Town Councils of Nhlangano, Hluthi, and Lavumisa	Project Brief and discussion of council procedures for servitude acquisition Compliance and Monitoring meetings	-Formal meetings -Email -Workshops -Site visits -Posters -Press Statements -Project brief documents	May 2019 On-going
Regional Administrator	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)	-Formal meetings -Email -Workshops -Site visits -Posters -Press Statements -Project brief documents	March 2019 (Annex I) On-going and frequency yet to be determined
Eswatini Royal Police Service	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.	-Formal meetings -Site visits -Posters -Press Statements	Frequency yet to be determined
Eswatini National Trust Commission (ENTC)	Present information on the Project Allow group to comment – opinions and views	-Formal meetings -Site visits -Posters	Frequency yet to be determined
Eswatini Tourism Authority			

	<p>Build impersonal relation with high level stakeholders</p> <p>Site visits where necessary</p>	<p>-Press Statements</p>	
<p>Chiefs (Community Leaders)</p> <p>Community Liaison Officers</p>	<p>Preliminary Meeting</p> <p>Present information on the Project to the community leaders</p> <p>Induction and trainings on Project</p> <p>Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted</p> <p>Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc.</p> <p>Resettlement engagement Meetings (Refer to RPF and RAP)</p> <p>Site visits</p>	<p>-Formal meetings</p> <p>-Interviews</p> <p>-Email</p> <p>-Workshops</p> <p>-Site visits</p> <p>-Public Meetings</p> <p>-Posters</p> <p>-Press Statements</p>	<p>End of March 2019</p> <p>On-going and frequency yet to be determined</p>
<p>Local Communities</p>	<p>Present Project information to a large group of stakeholders, especially affected community members</p> <p>Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted</p> <p>Distribute non-technical information</p> <p>Facilitate meetings with presentations, PowerPoint, posters etc.</p> <p>Resettlement engagement Meetings</p>	<p>-Focus group discussions</p> <p>-Interviews</p> <p>-Public meetings</p> <p>-Workshops</p> <p>-Site visits</p> <p>-Posters</p> <p>-Press Statements</p>	<p>End of March 2019</p> <p>May -June 2019</p> <p>On-going and frequency yet to be determined</p>

<ul style="list-style-type: none"> • Swaziland Action Group Against Abuse (SWAGAA) • Coordinating Assembly for NGO's (CANGO) • Youth Organisation/Associations • Women Organisations/Associations • Organisations for disabilities • Organisations for prevention of Gender based violence and Violence against Children • Organisations on HIV • Organisations on labour rights 	<p>Distribute non-technical information</p> <p>Facilitate meetings with presentations and PowerPoint</p> <p>Allow the group to provide their views and opinions</p> <p>Request guidance on how to handle issues related to their target groups as NGOs especially the vulnerable parties likely to be affected.</p>	<ul style="list-style-type: none"> -Formal meetings -Email -Workshops -Site visits -Posters -Press Statements 	<p>Frequency yet to be determined</p>

Table 6: Communication Channels

Communication Channel	Objective	Target Stakeholders
Media (newspaper) Posters	<ul style="list-style-type: none"> • Make announcements regarding the Project and ESIA process; • Inform stakeholders of meetings or the availability of project data. • Inform stakeholders of meetings or the availability of project information. 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups • Non-government organizations (NGOs);
Email	<ul style="list-style-type: none"> • To distribute all project notification material to those parties with access to this facility; • To inform stakeholders of availability of project data including tabling of ESIA reports (Scoping report, draft ESIA report etc.). 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Non-government organizations (NGOs); •
Face to face meetings: <ul style="list-style-type: none"> • Workshops • Formal meetings • Community meetings • Focus Group Discussions 	<ul style="list-style-type: none"> • To transmit information about the Project and ESIA process and reinforce two-way dialogue. 	All stakeholder groups to be targeted through one of these engagement needs.

2.7.1 Considerations for the Engagement Process

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.

2.8. Culturally appropriate engagement

It is critical that engagement is culturally appropriate, especially, but not exclusively, in terms of impacted communities. EEC plus the lead ESIA consultants are all familiar with the ethnic and cultural complexity of Eswatini. Most stakeholder engagement will be with rural community inhabitants and it is known from previous engagement activities with such communities that

traditional social and cultural norms are respected by almost all inhabitants. Local people have expectations that 'outsiders' will proceed through the 'correct' customary channels involving an appropriate local leader(s) before beginning work or initiating consultations with community residents. It is the intention that the ESIA local consultant will manage and, as appropriate, lead engagement events. Also, it is expected that all engagements will be in Eswatini.

Prior to any engagement event the following actions will occur:

- Preparation of standard 'question and answer' sheets tailored for specific stakeholder types (based on 'lessons learnt' analysis and common issues raised in previous engagement);
- Planning/design of engagement action(s) with PM, consultants and then key 'traditional' and 'formal' authorities;
- Reaching an internal ESIA team agreement on the role of local and international consultants during stakeholder events and whether the presence of a EEC staff is appropriate;
- Selection of individual stakeholders with whom engagement will occur;
- Selection of methods for disclosure of information (including such topics as format, language, and timing);
- Selection of location and timing for engagement event(s) (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring);
- Agreeing mechanisms for ensuring stakeholder attendance at engagement event(s) (if required);
- Identification and implementation of feedback mechanisms to be employed.

2.9. Monitoring Stakeholder Engagement Activities

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.

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

2.9.1 Review of Engagement Activities in the Field:

During engagement with stakeholders the ESIA team will assess meetings by asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly.

Conduct debriefing sessions with the engagement team while in the field. This will help to assess 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 include:

- a) Stakeholder database
- b) Issues and Response table, and
- c) Meeting records of all consultations held.

Moreover, the tool can be used to manage ongoing issues, and for stakeholder identification and analysis processes.

2.9.2 Reporting Stakeholder Engagement Activities

Performance will be reviewed following the engagement sessions conducted in the field. In addition, there will be opportunity 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 comments received on specific issues, type of stakeholder and details of feedback provided
- Numbers and type of stakeholders who come into contact with 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.

3. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE

This SEP needs to be updated and refined throughout the lifecycle of the Project. During this process the focus and scope of the SEP will be updated to ensure that the EEC addresses external changes and adheres to its strategy.

The key life-cycle phases to be considered when implementing stakeholder engagement are briefly discussed below.

- Design/Plan: the process of ensuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements;
- Implementation: the process and activities are implemented as planned

3.1. Stakeholder Engagement and Project Cycle

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.

Stakeholder engagement is an on-going process throughout the life of the project:

- Planning/design (including disclosure);
- Construction
- Commissioning

Disclosing and consulting on the draft results of the ESIA process is an integral part of the engagement process. Within the overarching ESIA engagement objectives, the specific objectives for the ESIA phase are to:

- Provide feedback to the stakeholders on the draft impact assessment and associated management/mitigation measures
- Gather stakeholder input on the impact assessment and outlined mitigation and enhancement measures

The disclosure and consultation activities will be designed along with some guiding principles:

- Consultations must be widely publicised 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 maximise 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 at a later time

Targeted stakeholders may comment on the ESIA within the time indicated.

There are various avenues that will be employed in the stakeholder engagement process:

- Community Forums:** To facilitate effective consultation with the communities during implementation of the project, the Project Manager (PM), establishes community forums through local community established leadership to disseminate project information to community members.
- Local Government:** Government representatives (Government Representatives on respective Tinkhundla Centres, District/Town Officers, Chief's Royal kraals, etc) as a channel to disseminate information on the project.
- 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 (communities).
- Media:** Newspapers commonly read in the project area will be used notify the general public.

4. SEP RESOURCES AND RESPONSIBILITIES

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within EEC PIU, its regional offices and local sub-contractors. The roles and responsibilities of the organizations are presented below.

The Project Implementation Unit (PIU) will be 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, Social Development Officer and an Environmental Officer.

The Social Standards Officer who is part of the PIU be responsible to manage all social development aspects of the NRAP. The Social Standards Officer (SSO) will oversee all planned stakeholder engagement activities or in process of being implemented. Responsibilities of the SSO include the following:

- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA;
- Oversee all stakeholder engagement related activities for the Project;
- Manage the grievance mechanism;
- Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
- Liaise with the project managers to ensure that stakeholder engagement requirements/protocols are understood; and
- Proactively identify stakeholders, project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

Owner’s engineer (Consultant) shall be recruited to 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 ESMPs, LMP, SEP and RAPs. After familiarizing themselves with the project area through reading and consultations with the EEC Project Unit, the consultants will design appropriate questionnaires intended for data collection at project location levels. The consultant will design questionnaires for data collection from various households, individual farm units, depending on the nature of information source. The RAP development, as well as monitoring and implementation, will be done in close collaboration with all impacted households, affected community members, chiefs, Royal kraal council members and other interested and affected parties. The consultations will be on-going and an integral part of the project as set out in this RPF.

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) MD’s Office.

The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarised below.

Internal Departments

EEC Departments	Role	Interest	Influence	Coordination	Frequency
Commercial Services	coordinate overall procurement	High	High	Hold meetings to update procurement	Regularly

EEC Departments	Role	Interest	Influence	Coordination	Frequency
	under the project and prepare and revise Procurement Plans as needed			plans and review delivery timelines that have high project risk impact	
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

EEC Departments	Role	Interest	Influence	Coordination	Frequency
Corporate Services	Recruitment of PIU staff such as the Social Officer and Procurement Officer	Medium	Medium	Share PIU staff requirements	As needed
MD's Office	Ensure timely approval of procurement processes and	High	High	Provide updates on project progress through reports and meetings to discuss project risks that need their intervention	Regularly

Community Liaison Officers - EEC through the assistance of the Chiefs (Community Leaders) will hire Community Liaison Officer who will be the direct contact for PAP in the local communities. They will provide EEC with assistance during consultations, identification of PAPs, and conducting of interviews, where required. The EEC considers the Community Liaison Officers to be an extension of the PIU and therefore will be entitled to a stipend according to traditional practices for similar community office bearers and therefore will not be salaried like the PIU staff.

4.1. 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.

4.1.2 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.

4.1.3 Budget

The Marketing and Corporate Department has an adequate standing budget allocated towards the Stakeholder Management Program. This is a budget that, as when is necessary, will be supplemented an increase or by other budgets related to the activities required for the SEP. Also, the HR Department will be engaged to consider the extra staff hired and include in the EEC payroll database.

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5. GRIEVANCE MECHANISM

5.1. Definitions and Grievance Procedure

A grievance mechanism has been developed for potential use by external stakeholders. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. Labour related grievances shall be addressed in accordance with Section 9 of the Labour Management Procedure (LMP) and Resettlement related grievance shall be addressed in accordance with Section 12 of the Resettlement Policy framework (RPF).

This grievance mechanism ensures that complaints and grievances (see 'definitions' below) are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. It does not deal with 'concerns' which are defined as questions, requests for information, or perceptions not necessarily related to a specific impact or incident caused by a project activity. If not addressed to the satisfaction of the person or group raising the concern, then a concern may become a complaint. Concerns are not registered as a grievance but will be managed via the EEC external communications plan.

Key definitions are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by the project activities, which has affected (i) an individual or group adversely, (ii) the interests of an individual or group and who wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance; and
- Grievance: 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 (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

The grievance mechanism described in this section includes both complaints and grievances (hereinafter referred to only as 'grievances').

Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The grievance mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both a proponent/operator and external stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

This grievance mechanism sets out the following steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and
- Unacceptable behaviour by staff or employees.

It is critical that stakeholders understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism.

5.2. Grievance Redress Process

A grievance redress mechanism (GRM) is presented below to uphold the project's social and environmental safeguards performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs). The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

- 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.

As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise community level, project level and Eswatini judiciary level redress mechanisms. The details of each of those components are described as follows.

5.3. Community Level Grievance Redress Mechanism

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at local and national level. This is primarily concerned with the extended family members.

However, regarding disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the Project, the mechanism will involve the Town Officer, landowner(s) concerned, and if required, the representative from the Ministry of Natural Resources and Energy.

It is expected that any land dispute issues pertaining to the Project would be resolved at this level given the nature of land ownership and the significant authority (Boarder Assessment Committee) vested under the Minister for Natural Resource and Energy.

Where issues caused by the project are raised and resolved through these existing community level grievance redress mechanisms, it is important that a mechanism for reporting them to the EEC is established. The points of access for grievances will be shared as part of consultation with all PAPs and through broader community consultation. Social Standards Officer will serve as the overall point of registration for any resettlement related complaints coming from each royal kraal Community Liaison Officer and oversee the process to reach resolutions. The issue can be logged as an anonymous grievance.

PAPs may complain or raise a grievance for a variety of reasons associated with resettlement impact and compensation, including but not limited to:-

- (a) Identification of affected land and associated assets within the Project area;
- (b) Ownership/responsibility for the land and associated assets;
- (c) Valuation of land or associated assets;
- (d) Quality of replacement assets;
- (e) Other compensation allowances;
- (f) The timing or manner of compensation payments;
- (g) Conduct of Project staff/representatives, or their methods in dealing with compensation.

When a grievance is logged by the Social Standards Officer, The Social Standards Officer will acknowledge the complaint, unless the issue is logged anonymously. If the issue is registered anonymously it will be automatically referred to the head of the Project Unit. Upon registration, the Social Standards Officer will refer the issue for resolution or mediation to relevant officials. The aim is to resolve all grievances within four weeks. Any grievance which is not resolved within that timeframe will be reported in detail in monthly Project Unit report and quarterly reports to the World Bank. All other grievances will be aggregated to track trends for managerial response.

In principle, where the complaint is related to Swazi Nation Land, the Social Officer will seek to mediate the situation through the community liaison officer. Where an issue related to deeded or land on 99-year lease, the Social Standards Officer will liaise with the project unit to determine proposed resolution.

5.4. Project Level Grievance Redress Mechanism

The objective of the project level GRM is to bring the GRM closer to PAPs. Issues that are not resolved at project level GRC shall be handled at the project level. All effort shall be made to resolve issues at the first instance.

Many project related grievances are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers disputes etc. Often, they can be resolved easily on site. Other grievances are more difficult especially when it's about land boundaries, or misunderstandings between affected households and the Contractor regarding access arrangements. Most of these cannot be resolved immediately and on site.

In circumstances where disputes cannot be resolved by on site or through first instance dispute resolution arrangements, the dispute shall be directed or transferred to the Project Level GRM.

The PAPs Community liaison officer shall carry out the following as regard to redressing grievances:-

- a) Hear the grievances of the PAPs, and provide an early solution to those they are able to;
- b) Immediately bring any serious matters to the attention of the Project unit or Social Standards Officer;
- c) Inform the aggrieved parties about the progress of their grievances and the decisions of the Project unit.

A Social Standards Officer will register the grievance raised by the PAPs and address the grievance forwarded by the PAPs representative.

The Social Standards Officer will try as much as possible to arrive at a compromise for the complaints raised. This may be obtained through a series of conciliations, mediations and negotiations exercises conducted with the PAPs. In situations where PAPs are not satisfied with the outcome, the PAPs have the right to file the case to project GRM and World Bank GRM described below or have the option to take his/her case directly to the established legal system as provided by Eswatini law².

The project level GRM shall have the following Grievance Redress Committee (GRC) members:-

- (a) Regional Administrator (RA), Chairperson
- (b) Supervising Consultant, Member
- (c) PIU Project Manager, Member
- (d) The Contracting Entity, Member
- (e) Community Liaison Officer
- (f) PAPs' representative

The project level GRC shall resolve or reach a decision five (5) days from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved PAPs in writing and maintain a record of all decisions related to each case.

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

- (a) General Manager, Chair person
- (b) Legal Compliance Officer, Member
- (c) Social Development Officer, Member
- (d) Safety Health Environmental Risks and Quality Manager (SHERQ)
- (e) PAPs Representative

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.

² As regulated by Eswatini Energy Regulatory Authority Act, Electricity Act, and the Acquisition of Property Act.

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 possible that for land issues, it would be advisable for the complainant to take his/her issue to the Minister of Lands for a final pronouncement.

It is rare for a complaint to be unresolved after the Ombudsman's decision or for MNRE's resolution to be taken further. However, on both cases, the very last resort will be at the Courts, or Land Court for land disputes.

It is vital that appropriate signage is erected at the sites of all works providing the public with updated project information and summarising the GRM process, including contact details of the relevant Project Contact Person. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in English and SiSwati) should not inhibit the lodgement of any complaint.

The Complaints Register will be maintained by the Social Standards Officer as the PCP, who will log the: i) details and nature of the complaint; ii) the complainant name and their contact details; iii) date; iv) corrective actions taken in response to the complaint. This information will be included in EEC's progress reports to the Bank.

The project level process can only act within its appropriate level of authority and where appropriate, complaints will be referred on to the relevant authority such as those indicated.

5.5. Judiciary Level Grievance Redress 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.

Table 7: Grievance Redress Process at Project Level

Stage	Process	Duration
1	The Aggrieved Party (AP) will take his/her grievance to through community liaison persons or Construction Site Supervisor (CSS), Social Standards officer (SSO) or call/email/whatsapp/ the EEC PIU who will endeavour to resolve it immediately. Where AP is not satisfied, the CSS will refer the AP to the Project's Contact Person (PCP). For complaints that were satisfactorily resolved by the CSS, he/she will inform the PCP and the PCP will log the grievance and the actions that were taken.	Anytime
2	On receipt of the complaint, the Project PCP will endeavour to resolve it immediately. If unsuccessful, he/she then notifies PIU Project Manager	Immediately after logging grievance
3	The PIU Project Manager will endeavour to address and resolve the complaint and inform the aggrieved party. If it's a land issue, the Project Manager will advise the EEC CEO, to engage the MLNR. The Project Manager will also refer to the EEC Project Manager other unresolved grievances for his/her action.	
4	If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level, the EEC Project Manager, will then refer to matter to the National Steering Committee (NSC) for a resolution.	1 month

5	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the NSC, he/she is free to refer the matter to the Ombudsman's Office or MLNR if it is land matters.	Anytime
6	Land related issue, EEC CEO may seek the assistance of the MLNR CEO.	Immediately after stage 3
7	If the issue remains unresolved through the Ombudsman's decision or the Minister of Lands decision, then the ultimate step will be for the Courts or Land Court respectively to deliberate. Any such decisions are final.	Anytime

6. MONITORING AND REPORTING

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.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 8 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 8: Key Performance Indicators by Project phase

Phase activities		
Planning for construction	Share updates on project activities	Bill Boards displayed in allocated locations by time specified;

ESIA Implementation		Affected community stakeholders, with at least 30% women, have received and understand the NRAP/ESIA information disclosed and attended the public meetings; Communities provided feedback; No complaints about non-receipt of materials received.
	Confirmation that the ESMP tasks are defined as specific individual or grouped environmental and social clauses in contract bid documents.	EEC/PIU (Contract Manager) to draw on ESIA/ESMP/SEP for bidding documents
	Confirmation that environmental management criteria are included as part of the contractor selection process, including their experience preparing and implementing ESMPs, etc	EEC/PIU (Contract Manager) to draw on ESIA/ESMP/SEP for Contractor selection process
	A safeguards advisor located and retained as an advisor by the PIU, providing assistance with ESMP implementation, contractor briefing on habitat protection, contractor ESMP supervision (including observations during construction), and participation in community consultation	EEC/PIU safeguard strengthening
	Compliance monitoring checklists prepared and being used by the contractor and safeguards consultant and due diligence notes, completed as defined in the ESMP, and making the notes available in an easily accessible file for the contractor, Technical Coordinator, PIU Project Manager and others to use.	ESIA/ESMP/SEP to guide management and monitoring processes

The identification of NRAP-related impacts and concerns is a key element of stakeholder engagement that will occur over the complete NRAP life-cycle. As such, the identification of new concerns and impacts as the ESIA and NRAP progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

In the ESIA Reports there will be a review 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.

6.1 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.

6.2 Reporting Stakeholder Engagement Activities

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

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

- 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.

REFERENCES

Stakeholder Engagement Plan for Tonga

https://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/revised_factsheet_ess10_july_29_aki.pdf

ANNEXURES

ANNEX I: INITIAL STAKEHOLDER ENGAGEMENT MEETING REPORT

Purpose	Nhlangano – Lavumisa NRAP corridor stakeholder engagement meeting with Chief's Royal Kraal Councils
Date	8th March 2019 - 22th March 2019
Time (from – to)	
Venue	Chief's Royal Kraals along NRAP Corridor
Minutes taken by	Dumisani Shongwe
Agenda Item	Responsibility
1. Welcome and Introductions	Royal Kraal Chairman
2. Objectives of Meeting(NRAP Presentation) 2.1 Project Description 2.2 Goals of the NRAP 2.3 Project potential impact 2.4 Stakeholders continuous engagement 2.5 Project impact Mitigation plan(Environmental and social) 2.6 EEC Commitments and project funders	EEC
3. Feedbacks and Questions	All
4. Closing	All

ATTENDANCE:

See attached attendance list

1. Welcome and introductions

The Chief's Royal Kraal Chairman (Indvuna) welcomed EEC participants to the Meeting and introduced all members of the Chief's Royal Kraal Council and acknowledge the appointment made by EEC specifically to address the council. The chairman requested EEC to introduce themselves and Present.

2. Objectives of Meeting(NRAP Presentation)

2.1 Project Description

- 2.1.1 EEC informed the council that the Eswatini Network Reinforcement and Access Project (Project) supports the Government of the Kingdom of Eswatini's (GoKE) goal of providing access to modern energy to all by 2022 as stated in the National Energy Policy. Stated that the proposed NRAP will include construction of ≈87km of 132 kV transmission line from Nhlangano II to Lavumisa with 2 new substations at Matsanjeni and Lavumisa, and expansion works at the existing Nhlangano II substation, and the 11kV Hluthi switching station that will be converted into a 20MVA 132/11kV substation.
- 2.1.2 EEC informed the meeting that the route of the transmission line is likely to traverse over land belonging to community members which may result in temporary or permanent displacement which the EEC shall address through inclusive and participatory consultation with the affected persons or households and resettlement and compensation will be done in accordance to a policy framework which shall be shared and discussed with all stakeholders. EEC then mentioned that all efforts will be made by the project as far as practicable to reduce the impact of resettlement.
- 2.1.3 The EEC also told the meeting that there will be stakeholder engagement processes following this initial meeting to share information, consult affected persons and provide a mechanism for reporting grievances, concerns and any other issues related to the project.

2.2 The NRAP Goals

- 2.2.1 NRAP goal is to improve its network reliability and quality of supply to support growing demand in the region. It will cover the electrical, civil and electromechanical works, switchgear, and protection and control equipment thus reinforcing weak segments of the distribution network installing control equipment in key segments of the network.

2.3 NRAP Potential Impact

The meeting highlighted the following potential impact;

- 2.3.1 Land use and ownership due to right of way and encroachments;
- 2.3.2 Crops, Flora and fauna disturbances/ damage during construction;
- 2.3.3 The aesthetic and visual quality of the surrounding landscape of the project area from the introduction of transmission towers

- 2.3.4 Soil erosion due to excavation activities when constructing substations;
- 2.3.5 Occupational safety and health impacts from construction activities
- 2.3.6 Impacts on cultural heritage (cemetery, graves, sacred areas etc.)
- 2.3.7 . Land health as a result of poor waste management on site;
- 2.3.8 Community safety and health from construction activities and labour influx in the region;
- 2.3.9 Resettlement(relocations)
- 2.3.10 Public nuisance such as noise, dust pollution etc., during construction activities.

2.4 Continuous Engagement Plan

- 2.4.1 Each Chief's Royal Kraal is expected to appoint a Community Liaison Officer (CLO) to facilitated continuous consultation with person affected by the project to ensure that all stakeholders, particularly project affected households and communities, vulnerable and disadvantaged people are involved throughout the process of resettlement planning, implementation, and monitoring. The NRAP shall deploy appropriate consultation methods while engaging the various stakeholders, including: i) focus group discussions, ii) informal interviews and, ii) public consultations. In each of these consultations, the NRAP's Project Implementation Unit shall ensure that everyone's voice is heard, responded to, recorded, and fully incorporated into the RAP.

2.5 Project impact Mitigation plan(Environmental and Social)

The meeting was informed about the Project impact mitigation plan on environment and social issues as follows;

- 1) The Resettlement impacts will be avoided or minimized
- 2) Affected people will be defined inclusively
- 3) Meaningful consultation with PAPs and communities will be undertaken

- 4) All adverse Project impacts will be identified prior to implementation and losses properly recorded and compensated
- 5) PAPs are entitled to full compensation and rehabilitation measures on an equitable basis
- 6) Vulnerable groups will receive special attention
- 7) Cultural and religious practices will be respected.
- 8) Resettlement planning, budgeting and implementation will be an integral part of the Project.
- 9) Grievance, monitoring and evaluation procedures will verify
- 10) Effectiveness of resettlement measures.
- 11) Project activities must be in accordance with policy and legislative framework
- 12) Adherence to Labour management plans guidelines
- 13) Adherence to EHS Guidelines
- 14) Adherence to Labour laws

2.6 EEC Commitments

- 2.6.1 EEC informed the meeting of its commitments to; i) Climate Change Mitigation & Adaptation; ii) Pollution Prevention; iii) Waste Management plans; iv) Risk Assessment & Management; v) Sustainable Development; vi) Biodiversity Protection; vii) Social impact mitigation

Approaches:

Avoid: The Company will (where practicable) avoid activities that could result in significantly adverse impacts in a project area.

Prevent: The Company will prevent occurrence of adverse impacts on the environment during project implementation.

Minimise: Where unavoidable, the company will reduce the degree or extent/ duration of the adverse impact through immediate reaction.

Rehabilitate: The Company will restore affected project area zones to their original states

3. Discussion Feedbacks and Questions

3.1 Royal Kraals' Feedback and Discussions

The comments and responses that came from the Royal Kraal leaders and community members at large were invariably the same owing to the current poor state of the network reliability and quality of supply service that these communities experience frequently. Some of the comments that were made are as follows:



Figure 2: Initial stakeholder Engagement Meeting at Sihlahleni, Endlovini area under Zwide II Umphakatsi - Ezikhotheni

- The Chief's Royal kraal Council Chairman welcomed the project with appreciation and requested EEC to implement this project without fail to address the current state of power supply.
- The Meeting requested timelines of the project implementation. The response was that there will be a continuous engagement, the Technical feasibility study will identify all the requirement of the project which will then give the project timelines. This will then be communicated to all stakeholders.
- The issue of a Community Liaison Officer engagement was raised and addressed by stating that, Each Royal Kraal Council shall appoint one CLO and shall be paid by EEC for the duration of the Project.
- Current Electricity Group Scheme awaiting funding was raised and addressed by stating that, EEC will work hand in hand with Ministry of Natural Resources and Energy in addressing affordable electricity connection and funding of these schemes and all concerns will be addressed during the continuous engagement during project implementation.
- Employment issue was raised by the Council and was addressed that opportunity shall be available for unskilled labor within the

community, the awarded Contractor is expected to employment laborers along the Project corridor with the help of CLO.

3.2 Regional Administrator Feedback and Discussions

The Regional Administrators' Office was represented by the Regional Secretary, Mr Zwakele N. Dlamini, following that the term of office for the incumbent RA had come to an end was still awaiting the King to appoint a replacement. The regional Secretary made the following comments:

- Welcomed the project and thanked the EEC project team for the synoptic presentation of the project and emphasised the importance of the project to assist the Shiselwni region to drive its development agenda in line with Vision 2022 that was pronounced by His Majesty King Mswati III. He warned that this project should not just end with the disclosure process but EEC must ensure that it moves to implementation as is expected of the Water Project along the same corridor.
- The Regional Secretary pledged support to the project so that it succeeds and advised that since this is a national project he advises that the project be disclosed to all members of Local government heading the different Tinkhundla Centres and promised to play a pivotal role in ensuring that all Chiefs and Local Government Officials support the project and do not impede its progress.

4. Closing

- 4.1.1 The Royal Kraal Council chairman (Indvuna) closed the meeting with a word of Appreciation to EEC on the engagement at the early stage of the project.

Record of meeting proceedings prepared by:

Dumisani Shongwe

Approved by:



PROJECT MANAGER

DATE