



**Millennium  
Development  
Authority**  
Economic Growth and Poverty Reduction



**MILLENNIUM DEVELOPMENT AUTHORITY (MiDA)**

**STAKEHOLDER ENGAGEMENT PLAN  
GHANA POWER COMPACT**

**May, 2016**

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## LIST OF ACRONYMS

CBO                      Community Based Organization

EC	Energy Commission
ECG	Electricity Company of Ghana
ESIAs	Environmental and Social Impact Assessments
ESMS	Environmental and Social Management System
EPA	Environmental Protection Agency
ESPC	Environment and Social Performance Coordinator
ESP	Environment and Social Performance
FBO	Faith Based Organization
SGI	Gender and Social Integration
GRM	Grievance Redress Mechanism
IDRS	Internal Dispute Resolution System
IFC	International Finance Corporation
LC	Lands Commission
LVD	Lands Valuation Division
MMDA	Metropolitan, Municipal and District Assemblies
MIDA	Millennium Development Authority
MCA	Millennium Challenge Account
MCC	Millennium Challenge Corporation
NEDCo	Northern Electricity Distribution Company
NGO	Non-Governmental Organization
PAPs	Project Affected Persons
PDT	Project Delivery Team
PMC	Project Management Consultant
PS	Performance Standards
RAPs	Resettlement Action Plans
SEP	Stakeholder Engagement Plan
SGIP	Social and Gender Integration Plan

## 1.0 STAKEHOLDER ENGAGEMENT PLAN

This document outlines the strategies and approaches MiDA will adopt in engaging with all stakeholder groups for projects and activities within the life of the Power Compact. Per the International Finance Corporation (IFC)'s Performance Standard 1, stakeholder engagement is the basis for building strong, constructive and responsive relationships that are essential for the successful management of a project's environmental and social impacts. This stakeholder engagement plan is an integral part of MiDA's Environmental and Social Management System (ESMS). To reflect the continuous and dynamic nature of stakeholder engagement processes, this document will be revised periodically and as and when need arises, at least once a year.

### 1.1 Introduction

MiDA has developed an ESMS to provide the overall management framework for managing environmental and social risks and impacts associated with projects and activities under the Power Compact. This Stakeholder Engagement Plan (SEP) is an integral element of the MiDA ESMS for ensuring smooth implementation and sustainability of the Power Compact's projects and activities. It is also part of a MiDA-wide effort to meaningfully engage all stakeholders, and is a collaborative effort among all directorates. In addition to having a strong and efficient stakeholder engagement plan as part of the overall environmental and social management framework for compact project implementation, MiDA also recognises that stakeholder engagement is central to all other aspects of its operations.

MiDA will ensure continuous and effective stakeholder engagement with all stakeholder groups to ensure decisions are inclusive and better suited to the objectives of the Compact and that investments in the Compact program are sustainable.

In accordance with the Compact and MCC Guidelines for Accountable Entities and Implementation Structures, MiDA, through this SEP, intends to continue the consultative process with key stakeholders throughout Compact Implementation. Stakeholder engagement will be a mechanism through which stakeholders will provide advice and input to MiDA regarding the implementation of the Program. It is also intended to be used as a mechanism to inform the Stakeholders regarding program planning and implementation.

The extent of stakeholder engagement under this plan will commensurate with project risks and impacts on affected communities identified through the environmental and social performance framework as well as the broader MiDA operational aspects.

### 1.2 Objectives

The objectives of the SEP are to:

- Establish and maintain a constructive relationship with a variety of stakeholders over the life of the Compact
- Ensure affected communities and other stakeholders have access to established channels for making inputs and suggestions on actions that could affect their lives

- Ensure project affected communities and other stakeholders are provided with the opportunities and platforms to express their views on the project through a process of continuous involvement; whiles establishing mechanisms to provide feedback to them on how their contributions were considered.
- Ensure focused and inclusive engagement with men, women, the elderly, youth, displaced persons and vulnerable and disadvantaged persons or groups who are directly affected by Compact interventions
- Ensure timely disclosure of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language and format that is understandable to affected communities to help them participate meaningfully.
- Establish a mechanism for receiving and addressing grievances in a timely manner with particular attention to vulnerable groups.

Against this background, MiDA will:

- Ensure regular, timely, accessible and appropriate dissemination of information to all stakeholders particularly to directly project affected persons and groups in advance of consultation and decision making activities;
- Ensure planned and transparent consultation where necessary, with appropriate notification, clear disclosure of objectives and an agreed process of interaction, recording and follow-up;
- Ensure that consultations are fully socially inclusive, with women, youth, the elderly and other vulnerable groups;
- Provide an avenue for the Stakeholders to give advice and input to MiDA regarding the implementation of the Compact Program;
- Incorporating feedback into project or program design, and reporting back to stakeholders
- Ensure a two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed
- Promote healthy agreements and partnerships through the mutual identification of areas of cooperation, and the pursuit of good faith negotiation in this context;
- Report regularly and in a structured manner to all stakeholders, with special attention to appropriate forms of reporting among the participating communities
- Establish and maintain the management capacity, responsibilities and systems to ensure the effective life-of-Project implementation of the SEP.
- Establish clear mechanisms for responding to people’s concerns, suggestions, and grievances

### 1.3 Guiding Principles of MiDA SEP

MiDA stakeholder engagement is developed based on IFC Principles of good consultation which stipulates that an effective consultation is a two-way process that should:

- (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
- (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
- (iii) focus inclusive engagement on those directly affected as opposed to those not directly affected;

- (iv) (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and
- (v) (vi) Documented.

## 1.4 Regulatory and other Requirements for Consultation and Disclosure

Ghana Environmental Assessment Regulation LI 1652 (1999)<sup>1</sup> requires effective public consultation and participation as an integral component of the Environmental and Social Impact Assessment (ESIA) procedures. Project proponents are required by law to effectively and continuously engage potential project affected persons and communities and other stakeholders to ensure issues of concern to them are addressed in project design and implementation.

The EPA Act 1994 (Act 490)<sup>2</sup> also grants citizens the right to be informed about any development project carried out by either private or public institutions. The project proponents are required to engage various stakeholders including potentially affected communities, relevant national and local authorities, NGOs, civil society organizations and other groups at early stages of the project. This helps in obtaining local knowledge, addresses public views, concerns and values that can influence the project design, which in turn increases public confidence and minimize conflicts. Public participation is core in achieving an efficient and effective ESIA practice and implementation.

IFC Performance Standard (PS) 1 underscores the importance of early engagement with project affected communities defined as any people or communities located in the project's near geographical proximity, particularly those contiguous to the proposed project facilities who are subject to actual or potential direct project-related risks and or adverse impacts on their physical environment, health or livelihoods. Engagement should be based on timely and effective dissemination of relevant project information, including results of the process of identification of environmental and social risks and impacts and corresponding mitigation measures, in languages and forms preferred by the affected communities and allow for meaningful communication. The PS also requires the need to build upon channels of communication and engagement with affected communities established during the risks and impacts identification process.

IFC PS 5 requires regular consultation and engagement with a wide range of stakeholders for effective resettlement planning. The key stakeholder groups are defined as the economically and/or physically displaced persons and the host community as well as any governmental or other parties responsible for approving and/or delivering resettlement-related plans and assistance. PS 5 underscores the need for early communication to help manage public expectations concerning the impact of a project and its expected benefits. Where resettlement is envisaged, early engagement is needed to enable affected households, communities and other stakeholders to fully understand the implications of such impacts on their lives and to actively participate in the associated planning processes or decide upon trusted representatives to participate for them. Under PS5, resettlement activities will be implemented with appropriate disclosure of information, consultation and the informed participation of those affected.

## 2.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

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<sup>1</sup> <http://www.epa.gov.gh/ghanalex/acts/Acts/ENVIRONMENTAL%20ASSESSMENT%20REGULATION,1999.pdf>

<sup>2</sup> <http://www.epa.gov.gh/ghanalex/acts/Acts/ENVIRONMENTAL%20PROTECTION%20AGENCY%20ACT%201994.pdf>

## 2.1 Stakeholder Identification

MiDA recognizes that the first and important step in the stakeholder engagement process is the identification of our stakeholders; who they are, their groupings and sub-groupings. This section describes the various stakeholder groups to be identified. Stakeholder analysis, i.e. an in-depth look at each group's interest, how they will be affected, and to what degree and what influence they could have on the Compact projects. It is worth mentioning that specific project locations for the various projects and interventions under the Compact have not yet been finalized. However, within the broader framework of the projects and activities to be undertaken, the following categories of stakeholders can be identified;

1. Stakeholders who will be directly and/or indirectly affected by the Compact projects
2. Stakeholders that have interest in projects and interventions under the Compact
3. Stakeholders that have the potential to influence the Compact project's outcomes

### 2.1.1 Stakeholders directly and/or indirectly Impacted by Compact Projects

Ghana Compact II Projects will be implemented in various communities within the Greater Accra i.e. Accra East and West, and Northern Region (Tamale) of Ghana. The following are potential identified stakeholders who will directly and/or indirectly be impacted by the Compact projects either positively or negatively:

- (i) *Project-Affected Persons (PAPs)* for projects under the compact have been defined as any person or persons, households, businesses or other private or public institution who, on account of involuntary resettlement, would suffer the loss of livelihood and/or an asset (e.g., residence, business, other). This includes those who would lose their rights, title or interest in all or any part of the asset, in full or in part, permanently or temporarily, and who might suffer income or other economic loss as a consequence thereof, people in economic enclaves and markets who receive power illegally, petty traders, hawkers and settlers occupying rights of way of utility infrastructure, etc. PAPs will be identified in ECG and NEDCo operational areas in Accra East, West, and Tamale, as well as select markets and economic enclaves within these operational areas.
- (ii) *Other Project-Affected-Persons*: These are groups or individuals who could directly or indirectly be impacted by the environmental, social, health and safety impacts of projects and activities under the Compact. These impacts could include degradation of air, water, and soil; noise, damage or loss of access to cultural heritage, traffic congestion, social unrest caused by immigrant workers; risks of accidents to vehicle, pedestrians, electrocution, exposure to hazardous materials, loss of ecosystem services etc.
- (iii) *Project beneficiary stakeholders*: These are individuals or groups who will directly or indirectly benefit from Compact project interventions. These benefits could include direct access to metered power supply (either for residential/commercial use), schools, hospitals, markets and economic enclaves. The general public will also benefit from improved access to street lights on major roads in Accra

### ***2.1.2 Stakeholders that have interest in Projects and interventions under the Compact***

These are groups or organizations that are not directly affected by interventions under the Compact but their *interest* identifies them as stakeholders. This category of stakeholders include the following:

- Government, its Ministries, Departments and Agencies other than those listed as directly or indirectly affected;
- Non-Governmental Organisations and Not for Profit Organisations that concern themselves with environmental, social, and gender as well as electric power issues;
- Policy and law makers (i.e. Members of Parliament
- Civil society organizations, and policy think tanks
- Religious and faith based organizations
- Traditional authorities
- Security agencies

### ***2.1.3 Stakeholders that have the potential to influence the Compact Project outcomes***

The categories of stakeholders in this group include the following;

- Implementing Entities (ECG, NEDCo, EPA, Lands Commission, etc.)
- Local organizations and NGOs
- Government authorities
- Labor unions (Public utility workers union)
- Media

## **2.2 Analysis and Prioritization of Stakeholder Groups**

MiDA recognizes the important roles these identified stakeholder groups play, their interest, the extent to which they could be affected both directly and indirectly and the fact that the success and sustainability of Compact interventions depends largely on their support, collaboration and buy-in. To this end, MiDA will prioritize these groups and devise appropriate and acceptable approaches to engage them within the life of the Compact. It must be emphasized that the level of engagement with these stakeholder groups will vary depending on their level of influence and the extent to which they will be impacted.

In prioritizing, MiDA considered the following best practice guidelines per the IFC standards:

- What type of stakeholder engagement is mandated by law or other requirements?
- Who will be adversely affected by potential environmental and social impacts in the project's area of influence?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- At which stage of project development will stakeholders be most affected (e.g. procurement, construction, operations, decommissioning)?
- What are the various interests of project stakeholders and what influence might this have on the project?



- Which stakeholders might help to enhance the project design or reduce project costs?
- Which stakeholders can best assist with the early scoping of issues and impacts?
- Who strongly supports or opposes the changes that the project will bring and why?

To help decide on the engagement approaches to apply with its stakeholders, MiDA will apply the following prioritization criteria;

**Category 1:** These include direct Project Affected Persons that are subject to involuntary resettlement. It also includes other individuals or groups who may be affected socially or environmentally by Compact interventions. Groups benefiting directly/indirectly from positive impacts of Compact interventions are also captured within this category. Within the scope of the projects under the Compact, these could include the following:

- Land owners/Landlords (both private and public)
- Heads of family
- Shops/business owners
- Market operators (Local market organizations and market queens)
- Occupiers of Rights of Way along utility corridors
- Public utility workers union
- Beneficiary communities (schools, hospitals, markets and economic enclaves etc.)
- General public

For these categories of stakeholders, MiDA will **engage** at all stages of the project cycle i.e. pre-design, design, implementation and reporting.

**Category 2:** These include state institutions, agencies and utility companies who have the potential to influence the outcome of Compact interventions. These include the following:

- Electricity Company of Ghana (ECG)
- Northern Electricity Distribution Company of Ghana (NEDCo)
- Environmental Protection Agency (EPA) Ghana
- Lands Commission of Ghana
- Metropolitan, Municipal and district assemblies
- Utility companies (telecommunication, water and sewage)
- Other Implementing Entities
- Government
- Policy and law makers

For these categories of stakeholders, MiDA will **collaborate** with and engage at times at all stages of the project cycle i.e. pre-design, design, implementation and reporting.

**Category 3:** These are categories of stakeholders who may have high interest in Compact outcomes but may have low influence. These could include the following:

- Civil Society Organizations
- Non-Governmental Organizations
- Religious and faith based organizations
- Public and social institutions i.e. schools, hospitals etc.
- Community based organizations
- Development partners

- Environmental watchdogs
- Regional power pool agencies

For these categories of stakeholders, MiDA will **consult** and collaborate at times at all stages of the project cycle i.e. pre-design, design, implementation and reporting.

**Category 4:** These are categories of stakeholders who may have low interest in Compact outcomes and have low influence. These could include the following:

- Other PAPs including pedestrians, road users (impacts associated with traffic congestion), contiguous projects
- Media

MiDA will **keep informed** these stakeholders at all stages of project implementation phase.

## 2.3 Strategies for Engaging with Stakeholders

This section outlines the broader strategic approach MiDA will employ to constructively engage with all identified groups. It is organized according to categories per the stakeholder engagement prioritization criteria. Section 3.3 table 2 provides detailed roles and responsibilities within MiDA for the implementation of this SEP.

**Table 1** *Strategies for engaging stakeholders*

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
Land owners (both private and public) Landlords Traditional authorities <sup>3</sup> (heads of family)	<p>Lose their rights, title or interest in all or any part of the asset, in full or in part, permanently or temporarily.</p> <p>Long term economic loss as a consequence</p> <p>Community health and safety resulting from construction activities</p> <p>Lack of effective engagement could lead to delays in project implementation and hold ups.</p> <p>Early inclusive engagement with these groups could results in positive project outcomes, ensures buy in, smooth implementation and</p>	<p>MiDA will engage these groups once specific project locations are identified. Engagement will take the form of focus group meetings with identified land owners, families, traditional authorities and their designated representatives using other traditional mode of engagement.</p> <p>Venue or locations for these meetings will be agreed with all parties ensuring stakeholders will not have to travel long distances for such engagements.</p> <p>Valuation methods and general procedures for determining compensations will be discussed with these stakeholders. Concerns of women, the elderly, marginalized and other vulnerable groups within the family and traditional set up will be</p>	<p>Project documents including non-technical summary reports of infrastructure works to be undertaken, detailed engineering designs, brochures, and other project visual displays.</p>	<p>Engagement with this group will be a two-way constructive engagement where the views, concerns, opinions and suggestions are considered during design, implementation and reporting. Engagement will be an on-going process within the life of the Compact starting from design where their concerns and issues will be considered, addressed and factored into designs. Scheduled engagement at the various stages of the project will be agreed with the stakeholders. Opportunities will also be</p>

<sup>3</sup> The role of traditional authorities in land ownership in Greater Accra is quite minimal. Most lands belong to either families, in which case the family head plays a critical role, private individuals or the government. The situation in Tamale where most of NEDCo interventions will take place is similar to that of Accra. Traditionally ECG have resorted to the use of state lands or acquired lands from private individuals through negotiated sale for major infrastructure.

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
	sustainability of compact benefits.	<p>identified and given the opportunities for their concerns to be heard.</p> <p><i>MiDA ESP and Infrastructure team will lead the planning and engagement process supported by SGI, Reform unit, Communication and Outreach as well as PMC (design engineers)</i></p>		created for providing feedback and addressing grievances from affected parties
<p>Shops/business owners</p> <p>Market operators (market queens)</p> <p>Occupiers of Rights of Way along utility corridors</p>	<p>Loss of business hours, assets, income and livelihood. These stakeholder groups could also be impacted by community health and safety resulting from construction activities.</p> <p>Early constructive engagement with this group could improve general acceptability of the project by the potential affected communities, avoid delays in implementation, ensure their buy-in, and support for overall sustainability of Compact benefits.</p> <p>It is worth mentioning that the market queens who usually represent local market associations wield tremendous power. As such, getting them to understand the projects and their benefits could help to draw support for successful planning and implementation of project</p>	<p>MiDA will identify and engage these groups once project specific locations are identified. Engagement will take the form of public forums and town halls at a location agreed to by all. MiDA will conduct Interviews and engage with representatives including market queens of these groups to consider their concerns and issues of importance to them at all stages of the project cycle beginning with design where their inputs and suggested recommendations will be considered.</p> <p>MiDA will seek input and support from this group in identifying routing paths for stringing and laying power distribution cables.</p> <p><i>MiDA ESP and Infrastructure team will lead the planning and engagement process supported by SGI, Communication and Outreach as well as PMC (design engineers).</i></p> <p>Valuation methods and general procedures for determining compensations will be discussed with</p>	Questionnaires, posters, project implementation schedule, leaflets/flyers and brochures.	Engagement will begin from design when locations are identified. On-going engagement at various stages of the project cycle especially during resettlement planning and implementation and preparation of site specific RAPs and ESIA's. MiDA will provide regular updates on project implementation schedule ensuring timelines for implementation of infrastructure activities are communicated well in advance of time to all. During implementation, MiDA will create appropriate channels for receiving and dealing with grievances and providing feedback to affected communities.

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
	activities within markets and economic enclaves.	these stakeholders. MiDA will pay particular attention to women, youth, and other vulnerable groups ensuring their needs and concerns are considered and addressed.		
Public utility workers union	<p>Uncertainties with respect to job security with respect to the Private Sector Participation (PSP) activity in ECG could result in general apathy, labor agitation, and social unrest. This has the potential to affect the Compact and could project a negative image, publicity and reputation to MiDA/MCC</p> <p>Early constructive engagement with this group where detailed information on the PSP activity and the Compact is provided could allay fears of retrenchment, obtain their buy-in and collaboration to ensure the objectives of the Compact are met.</p>	<p>Workshops and seminars at a location agreed to by all parties. MiDA will have continuous targeted engagement with leadership of this group to ensure key messages and information are shared. Women groups within this group will be identified, engaged and given the opportunity for their concerns and issues to be heard.</p> <p><i>Engagement will be led by the operations head of MiDA and supported by Communications and outreach and Reform units.</i></p>	Documents related to the PSP activity, non-technical executive summary of Compact projects, newsletters and bulletins.	Engagement will be on-going within the PSP activity prior to EIF. This will continue within the life of the Compact. Opportunities will be created for receiving and addressing feedback from aggrieved parties.

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
Beneficiary communities/general public	This group could include schools, markets and economic enclaves, hospitals, residences and the general public who may benefit from improved access to electricity and lighting including street lightening along major roads in Accra. Early engagement with this group to outline benefits of projects and activities under the Compact is critical to ensuring support and buy-in for the life of the Compact	<p>Open forums, town halls, press conferences and media and public briefings.</p> <p><i>Engagement will be led by communication and outreach supported by infrastructure, ESP and SGI.</i></p>	Questionnaires, posters, project implementation schedule, leaflets/flyers and brochures.	Engagement will be on-going within the life of the Compact.
<p>Electricity Company of Ghana (ECG)</p> <p>Northern Electricity Development Company of Ghana (NEDCo)</p>	<p>Lack of proper planning and effective collaboration with these key implementing entities could result in deficiencies and delays in project design and implementation.</p> <p>Effective collaboration with these entities in project planning and design, environmental, social, health and safety consideration, implementation and monitoring could result in positive project outcomes and sustainability of Compact interventions.</p>	<p>Workshops, seminars and conferences at a location agreed to by all parties.</p> <p>MiDA will collaborate continuously with leadership of ECG and NEDCo as well as project teams including ESP, Gender, M&amp;E and communication at all stages of the project cycle through the sharing of project documents and related information, assessments and reports. Formal and informal meetings will also be used to collaborate.</p> <p>Women groups within ECG/NEDCo (e.g. power queens) will be identified, engaged and given the opportunity for their concerns and issues to be heard.</p> <p><i>Engagements with these key entities especially on negotiating and agreeing on IEAs will be led by head of operations head and supported by general counsel, finance and</i></p>	Implementing Entity Agreements (IEA), Environmental and Social Management Systems (ESMS), detailed project designs, Terms of References (TORs), M&E plan, Social and Gender Integration Plan (SGIP), newsletters, brochures and flyers.	Collaboration will be on-going soliciting views, opinions and recommended suggestions from these entities at all stages of project cycle and within the life of the Compact.

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
		<i>administration and ESP. For ESP and works related issues including health and safety and resettlement, engagement will be led by MiDA ESP supported by infrastructure and communications at MiDA and PMC.</i>		
Environmental Protection Agency (EPA) Ghana Lands Commission of Ghana	<p>Absence or lack of proper collaboration could result in delays in implementation of projects that have potential significant environmental, social, health and safety impacts.</p> <p>Early collaboration and engagements through Implementing Entity Agreements will help define, assign and agree on clear roles and responsibilities of MiDA and the IE in ensuring assessments, reports, permits and licenses are completed and implemented on time.</p>	<p>Meetings and workshops to share and exchange information, opinions, and concerns. MiDA will ensure information and communication flow is two way where the concerns of the IEs with respect to design and implementation are considered.</p> <p><i>Engagement related to IEAs will be led by head of operations and supported by ESP, general counsel and finance and administration.</i></p> <p><i>All other engagements including but not limited to operationalizing the agreements in the IEA for effective implementation will be led by MiDA ESP and supported by infrastructure as appropriate.</i></p>	Project documents including but not limited to IEAs, ESIA, ESMS, TOR, RAP, and other project reports	Collaboration will be on-going soliciting views, opinions and recommended suggestions of these entities at all stages of project cycle and within the life of the Compact.
Metropolitan, Municipal and district assemblies Government	<p>Lack of buy-in from the Metropolitan, Municipal and District Assemblies (MMDAs) could affect resettlement planning and implementation of key infrastructure works</p> <p>MiDA will leverage the influence of the MMDAs through effective collaboration to ensure</p>	<p>Meetings and workshops to brief, share information on the projects, activities and plans as well as receive inputs about the knowledge of the project area and for resettlement planning and implementation.</p> <p><i>Engagement will be led by ESP supported by infrastructure,</i></p>	Non-technical executive summary of project documents and reports, newsletters and flyers	On-going within the life of the Compact

Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
	resettlement planning and implementation is properly executed taken into account the expressed views, opinions and concerns of PAPs including women and vulnerable groups.	<i>communication, gender and social inclusion and PMC as appropriate.</i>		
Policy and law makers	Delays in passage of laws relating to the Compact could impact negatively on MiDA operations. One of such important laws is the amendment of MiDA's Act and ratification of the Power Compact by the Parliament of Ghana.	Meetings and workshops. These engagements will be led by the Chief Executive Officer (CEO) of MiDA and supported by head of operations, communication, reform unit and technical directorates as appropriate.  <i>Engagement will be led by CEO, supported by head of operations and communication and outreach.</i>	Non-technical executive summary of project documents and reports, newsletters and flyers	On-going within the life of the Compact
Civil Society Organizations Non-Governmental Organizations Religious and faith based organizations Media Public and social institutions i.e. schools, hospitals etc.	CSO, NGOs and faith based organizations tend to be advocates for good practices and advocates for the vulnerable and disadvantaged groups in society. Poor collaboration and consultation with this group in sharing and exchange of information has the potential to result in bad information and negative publicity with the general public  Having them on board, taking their inputs and suggestions and providing them with the appropriate project information could generate positive public	Town halls, questionnaires, public forums, press conferences and meetings.  <i>Engagements on issues related to environment and social performance will be led by MiDA ESP, supported by SGI, communication and outreach and infrastructure</i>	Non-technical executive summary of project documents and reports, newsletters and flyers. Again summary updates on implementation with respect to issues that affect the community and how issues of concern to them are considered and addressed within the scope of the projects.	Continuous. More of such collaboration will be promoted during design, when project locations are identified and during implementation of activities.



Stakeholders	Impacts on project outcomes	Methods of engagement	Information to be shared	Frequency of engagement
	interest in the compact interventions.			
Other PAPs including road users (impacts associated with traffic congestion), contiguous projects	Community health and safety within the project area of influence, reputational risk for MiDA/MCC, implementation challenges arising from pollution, accidents, and fatalities on the affected communities, and bad public image	TV and radio advertisement, publication of implementation schedule in local newspapers.  <i>Messages for informing these group of stakeholders will be prepared by the communication and outreach directorate with direct input by infrastructure, ESP and SGI.</i>	Implementation schedule, flyers and leaflets on community health and safety at the construction site	Continuous during works construction.

## 3.0 MANAGEMENT PROGRAMS FOR SEP IMPLEMENTATION

The management of MiDA appreciates and recognizes the value of a well-developed and fully executed stakeholder engagement plan within its operations and projects under the Power Compact. It further appreciates that the success and sustainability of its operations and outcomes of compact interventions depends, to a large extent, on how well this SEP is implemented within the life of the Compact. Being an integral element of the MiDA ESMS, management appreciates the fact that this SEP will be mainstreamed within its operations and that clearly defined roles and responsibilities will be established and communicated to all staff and resources made available for its effective implementation.

This section outlines how MiDA will integrate this SEP and engage all stakeholders groups at all stages of the project cycle. Roles and responsibilities of management as well as key actors in its effective implementation is also presented.

### 3.1 Project Design

The design phase of the project life cycle offers the best opportunity for effective consultation, engagement and active participation of all relevant stakeholders. This ensures the outcome of the design reflects the inclusive engagement and participation of all stakeholders including women and vulnerable groups in the society. At the design stage, MiDA project delivery team including infrastructure, ESP<sup>4</sup>, SGI, PMC (design engineer) and the Communication and Outreach Unit will facilitate and ensure constructive engagement and collaboration of relevant stakeholders and actors to ensure design is environmentally and socially sound and gender inclusive. This engagement will be led by ESP and SGI and supported by other members of the project delivery team outlined.

Projects and activities that have the potential to have significant adverse environmental and social impacts include the construction of substations, Bulk Supply Points (BSP), underground cables, sub-transmission lines, medium voltage distribution lines, low voltage distribution lines, and low voltage feeder bifurcation. Key potential impacts and risks associated with these interventions include community as well as occupational health and safety and involuntary resettlement. In designing these activities, will MiDA develop and build constructive relationships with relevant stakeholders on an on-going basis through the life of the Compact. Identification of project specific locations will be jointly carried out by MiDA infrastructure team, ECG and NEDCo. ESP and SGI will lead in building relationships with the ESP, Infrastructure and SGI (if any) focal points at these entities for effective environmental and social sound design and implementation.

During design and once project specific locations have been identified, MiDA will identify, engage, collaborate and consult with relevant stakeholders in undertaking the following activities:

- Land acquisition and compensation
- Resettlement planning and implementation (RAP preparation)
- Developing Environmental and Social Impact Assessment (ESIA)

During land acquisition and compensation, MiDA ESP will lead to engage and consult with key stakeholders including land owners, family heads, traditional authorities (if possible), queen mothers,

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<sup>4</sup> ESP is used to refer to MiDA ESP and consultants i.e. RAP and HSE consultants as appropriate.

public institutions and government agencies including but not limited to Metropolitan, Municipal and District Assemblies. Issues of concern and of interest to women, elderly, youth, and disadvantaged or vulnerable members of families, or institutions within the project affected stakeholders will be prioritized, addressed and communicated appropriately to them by MiDA SGI. Inputs from the identified stakeholders will be taken into account in arriving at a compensation level acceptable to all.

MiDA will use consultation as an effective tool for coming to an agreement with project-affected stakeholders on what compensation levels and measures they will find acceptable as well as in designing benefits programs that are targeted and culturally appropriate. MiDA will make available relevant project documents and information in a form and substance appropriate and acceptable to project affected stakeholders during consultation and engagement to help them make meaningful input.

In developing ESIA and RAP for infrastructure activities, MiDA will engage and consult relevant stakeholders to broaden and discuss the range of options available to eliminate, offset or minimize potential adverse environmental and social impacts. This engagement will be led by ESP with support from the infrastructure team and PMC (design engineer) as well as SGI. The local knowledge of directly affected stakeholders and experiences of many NGOs, civil society organizations and the academia may help make mitigation measures more effective.

Prior to early engagement and consultation in developing ESIA and RAP, MiDA ESP, infrastructure team and PMC (design engineer) will make the following information available to stakeholders to help them engage meaningfully:

- An overall description of the project and its main objectives, including specific locations and the timetable of the main events: construction phase, peak operational activity, decommissioning
- A more detailed description of the project as it relates to topics for consultation or wider stakeholder engagement
- An outline of the environmental and social impacts to be assessed during the consultation, and any provisional conclusions or predictions already reached including proposals for mitigation measures

MiDA project delivery team, led by ESP, will document the process and results of the early consultation by keeping track of the 'who', 'what', 'when', and 'where' of the consultation. This is key to ensuring effective implementation of the process. Commitments made by parties during the consultation will also be recorded. Keeping documentation of the consultation process will help MiDA demonstrate to stakeholders that their views have been incorporated into project strategies and is useful resource for reporting back to stakeholders on how their concerns have been addressed.

## 3.2 Construction

Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of infrastructure as well as the management of contractors and construction contracts. Engagement during construction is essentially about involving stakeholders in assessing whether measures are working as intended, being responsive to grievances, and identifying alternatives where there are failings. MiDA recognizes that effective engagement with stakeholders during construction phase will set the tone for community, local government, and other external relationships for the life of the Compact.

MiDA envisages the following potential issues of concern to stakeholder during construction; the list is not exhaustive.

- Involuntary resettlement and compensation issues (if unresolved);
- Loss of assets and livelihood;
- Temporary loss of power during construction;
- Traffic congestion in projects' area of influence;
- Labor issues;
- Waste generation and disposal;
- Pollution (air, noise, water, land); and
- Transmission of infectious and endemic diseases including STD/HIV, Malaria and Tuberculosis.

Prior to the start of construction MiDA led by ESP and SGI, and supported by infrastructure and PMC will identify stakeholders likely to be affected by construction and their concerns prioritized. Concerns and issues of risks to women and vulnerable groups will be given high priority. MiDA ESP, supported by SGI and infrastructure teams, will engage and continuously consult potential project affected stakeholders notifying them of construction timelines and any potential changes to the relevant schedules. For communities living near to the select project site, the effects of noise, dust, vibration, traffic, and lighting associated with construction can cause disturbances and emotional stress, as well as pose a physical or health hazard. Notification will be communicated in the following areas:

- The purpose and nature of the construction activities;
- The start date and duration of planned construction activities; and
- Potential impacts and proposed mitigation measures.

The above information will be communicated using various means including the MiDA website, roadside signs near construction sites, poster boards in public places, newsletters, door-to-door leaflets distribution, radio messages, mobile public address systems, and via stakeholder representatives or public meetings. This campaign will be led by contractors under supervision of PMC (supervisory engineer) and supported by MiDA ESP and communication and outreach directorate as appropriate. This information will be communicated in a form and substance acceptable to the affected groups. To ensure that specific sections of the community who may include youth, women, the elderly and any other vulnerable persons are engaged, focus group discussions will be held to facilitate open discussions and to ensure that their views are heard.

Prior to the start of construction, MiDA ESP will organize a training session for contractors and their subs as appropriate on good practice stakeholder engagement. Expectations of MiDA for effective stakeholder engagement with affected communities by the project managers, supervisors, and field staff will be presented for the understanding of all for effective implementation.

During construction, it is typically the contractors and subcontractors who have day-to-day contact with local stakeholders. The quality of their interaction with the affected communities, government authorities and other stakeholders will reflect directly on the project and can have reputational consequences for MiDA. Developing prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance can help in the selection process. MiDA will ensure the Bid Data

Sheet for works contracts prepared by MiDA procurement and the Procurement Agent with input from the PMC (design engineer) include request for the following:

- Social and community engagement policy;
- Numbers of suitably qualified managers and staff in the following areas: local
- Procurement management, community liaison, competency training/apprenticeships, and local business support; and
- Employee training and community relations record.

MiDA ESP will include a questionnaire in the bid package designed to capture the capacity of the contractor to manage stakeholder engagement during the construction work, including for example:

- How they would go about implementing the types of environmental and social impact mitigation measures that will become conditions of the contract (concentrating on the high-risk impacts i.e. community health and safety and grievances related to resettlement and compensation);
- Practices for managing engagement with affected communities;
- Practices for recruitment (including rotation cycles), worker camp management, local procurement, and human resource development and training;
- Specific experience in enhancing the employment and local procurement opportunities for communities adversely affected by construction activities (experience should relate to communities with similar skill levels and livelihood vulnerability to those in the project area); and
- Extent of past efforts by the contractor to develop the capacity of sub-contractors and local level suppliers.

MiDA ESP will develop and implement an effective grievance and redress mechanism that:

- Provides affected people with direct and accessible avenues for making a complaint or resolving any dispute that might arise during the course of the project;
- Ensures that appropriate and mutually acceptable corrective actions are identified and implemented ; and
- Verifies that complainants are satisfied with outcomes of corrective actions.

MiDA ESP will report, on regular a basis, to stakeholders on progress of environmental and social management programs.

### **3.3 Roles and Responsibilities of Management and Key Actors in Stakeholder Engagement Planning and Implementation**

*Table 2 Roles and Responsibilities of Management and Key Actors*

Position	Roles and Responsibilities
Chief Executive Officer	<p>Ultimate responsibility and authority for ensuring good implementation of the MiDA SEP</p> <p>Authority for approving resources for SEP implementation</p>
Chief Operating Officer	<p>Leads the Project Delivery Team to ensure project specific SEPs are developed and implemented</p> <p>Provide lead role in negotiating Implementing Entity Agreements (IEA) with stakeholders</p>
Chief Financial Officer	<p>Reviews and approves budget and resources for SEP implementation</p> <p>Collaborates with ESP and fiscal agent to ensure payments for compensations are timely.</p>
General Counsel	<p>Reviews procurement packages to ensure prequalification appraisal criteria and related questionnaires for assessing contracts bidder's capacity for developing and implementing effective SEP are contractually enforceable.</p>
Procurement Director	<p>Collaborates with ESP and infrastructure team to incorporate prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance to help in the selection process.</p>
Environmental and Social Performance Directorate <sup>5</sup>	<p>Provide lead role in collaborating with General Counsel in developing IEAs with the EPA and Lands Commission</p> <p>Facilitate negotiations between MiDA and Implementing Entities i.e. EPA and Lands Commission in negotiating IEAs with them</p> <p>Collaborate with PMC and infrastructure team to develop prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance to help in the selection process and to ensure these criteria is incorporated into bidding documents.</p> <p>Provide lead role in collaborating with SGI and infrastructure team in identifying stakeholders especially direct Project Affected Persons (PAPs) and other stakeholders ensuring methods and approaches for engaging PAPs guarantees the participation and expressed concerns and perspectives of women and vulnerable groups.</p> <p>Collaborates with Resettlement Action Plan (RAP) consultant to ensure effective and timely implementation of RAPs taking into account the views</p>

<sup>5</sup> The directorate comprises the ESP Director, ESP Coordinator, and Health and Safety Coordinator. The ESPD provides overall leadership to the directorate and is the principal lead of all activities outlined under the roles and responsibilities for Stakeholder Engagement Planning and Implementation

	<p>and concerns of women and other vulnerable groups ensuring their voices are heard and that issues of concern to them are considered with priority.</p> <p>Collaborates with infrastructure team, SGI and PMC in monitoring the operations of the works contractors to ensure effective implementation of their SEP, providing technical support in areas of non-compliance.</p> <p>Provide lead role in ensuring grievances and redress from affected persons and communities within the project area of influence as well as other stakeholders are addressed timely in accordance with the established grievance and redress mechanisms.</p> <p>Ensures timely reporting to stakeholders on how their issues are addressed and measures put in place to address outstanding issues of concern to them, providing timelines for communicating resolutions in a form and substance culturally acceptable.</p>
Gender and Social Inclusion Director	<p>Collaborates with ESP and infrastructure team in identifying stakeholders especially direct Project Affected Persons (PAPs) and other stakeholders ensuring methods and approaches for engaging PAPs guarantees the participation and expressed concerns and perspectives of women and vulnerable groups.</p> <p>Ensures effective disclosure of information to PAPs and other stakeholders and soliciting feedback to include the voice, concerns, aspirations and suggestions of women and the vulnerable, such as People living with HIV and AIDS (PLWHAs) and People Living with Disability (PLWDs)</p> <p>Collaborates with ESP, PMC, and infrastructure team to monitor the operations of the works contractors to ensure effective implementation of their SEP, ensuring the concerns of women and vulnerable groups are considered and attended to.</p>
Communication and Outreach Director	<p>Collaborate with ESP and SGI to develop key messages and communication materials including but not limited to flyers, leaflets, short documentaries and other visuals and brochures to engage with and educate identified stakeholder groups</p> <p>Provide lead roles in developing and delivering outreach and education campaigns for stakeholders including PAPs</p>
Infrastructure team	<p>Collaborate with ESP and PMC to develop prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance to help in the selection process</p> <p>Assist ESP and SGI identifying stakeholders including directly affected PAPs</p> <p>Collaborates with ESP, SGI and PMC in monitoring the operations of the works contractors to ensure effective implementation of their SEP, providing technical support in areas of non-compliance</p>

	Ensures project's progress reports from contractors include sections or updates on the implementation of their SEP, issues, challenges and successes
Reform Unit	Provide strategic facilitation role in engaging with identified stakeholders including especially government agencies, NGOs, civil society organizations, faith based organizations, and think tanks
Procurement Agent	Collaborates with ESP, SGI, legal, infrastructure team and MiDA procurement to ensure prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance to help in the selection process is fully incorporated into the bidding documents.
Environmental Protection Agency EPA	<p>Collaborates with MiDA in developing IEA with them, negotiating to agree on roles and responsibilities for effective implementation</p> <p>Provide timely review and approval of Environmental and Social Impact Assessment documents including but not limited to ESIA's.</p> <p>Collaborates with MiDA in organizing public participation events at part of the ESIA process</p> <p>Collaborates with MiDA in monitoring activities of works contractors ensuring mitigation measures are adequate and effectively being implemented.</p>
Lands Commission	<p>Collaborates with MiDA in developing IEA with them, negotiating to agree on roles and responsibilities for effective implementation</p> <p>Assist MiDA in resettlement planning and implementation ensuring land acquisition process is timely executed and that valuation of assets and properties is carried in a way and manner that considers the expressed view, concerns and interest of stakeholders especially women and vulnerable groups.</p>
Program Management Consultant (PMC)	<p>Works with ESP, SGI and infrastructure team to develop prequalification appraisal criteria and related questionnaires that assess the capability of the main contract bidders to meet minimum standards for stakeholder engagement and social performance to help in the selection process.</p> <p>Collaborates with infrastructure team, ESP and SGI in monitoring the operations of the works contractors to ensure effective implementation of their SEP, providing technical support in areas of non-compliance.</p>
Contractors	Effective on the ground implementation of their SEP ensuring the concerns, issues and interest of stakeholders are considered



	<p>Develop programs to train staff to ensure respect for the rights of stakeholders including ensuring issues of interest to them are given needed attention.</p> <p>Ensures staff have the capacity to receive and address site specific grievances ensuring resolutions are effectively communicated. For cases that requires escalation to MiDA, staff on the ground should have the capacity of bringing same to the attention of PMC, assuring affected stakeholders of MiDA's capacity to resolve such cases in a timely manner.</p> <p>Develop programs to ensure staff have high professional ethics and standards to relate with communities and affected parties in a way and manner that projects the image and reputation of MiDA/MCC.</p>
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#### 4.0 GRIEVANCE AND REDRESS MECHANISM

The establishment and publication of a Grievance and Redress Mechanism (GRM) is a fundamental requirement of IFC Performance Standards 1 and 5. The overall objective of the GRM is to provide an effective, transparent and timely system that would give aggrieved persons redress and avoid litigation, minimize bad publicity, avoid/minimizes delays in execution of infrastructural works, ensures public health and safety, and sustainability of Compact interventions. The GRM will provide all persons and groups affected by MiDA's projects and activities avenues through which they can express their concerns and receive the needed corrective actions in an appropriate and timely manner. The GRM will be publicized as part of the ESMS and explained to relevant stakeholders. It will also outline where to go, whom to talk to if there's a complaint, and understand what the process will be for handling it.

MiDA ESP will make public the GRM through various media in a form and substance culturally acceptable to all project affected persons and other stakeholders. This will include publishing it on MiDA website for the information of all interested and affected parties at project and MiDA offices. In addition, for project affected persons and communities who may not have direct access to the internet or have difficulty understanding the English Language, MiDA ESP, with support from the Communications and Outreach Unit will simplify the contents of the GRM in locally accepted languages agreed with the affected parties. This will ensure that approaches, ways and contact information both at project locations and at MiDA office for seeking redress is clearly spelt out. The principal issues to be covered by the GRM would be related mainly to involuntary resettlement and construction related issues. To this end, the following issues will be considered in the GRM:

- Requests for information;
- Inventory and measurement of assets that were missed during census;
- Valuation of assets;
- Compensation awards and their disbursement;
- Matters related to physical relocation;
- Site clearance;
- Community health and safety;
- Traffic congestion; and
- To the extent possible issues related to ownership and inheritance.

The GRM will consist of a four-tier system which include the following:

- Local (project site) level;
- Complaint lodged at MiDA Office;
- Project-level grievance resolution; and
- National legal level'

The general process is that a project affected person and/or other stakeholders should first raise a grievance at the project location/office. If unresolved, it is referred to the MiDA Internal Dispute Resolution System (MIDRS). Beyond this level, the issue will be referred to the Grievance and Redress Committee (GRC). If this proves unsuccessful in resolving the grievance, the complainant needs to procure the services of a valuer (in a case of resettlement and compensation) and submit a report to Land Valuation Division (LVD) of Lands Commission and ultimately the courts.

#### 4.1 Local Level Grievance Redress

A complaint made to the project site office shall be received by the responsible officer (preferably, he/she should be an officer from the Supervising Engineer's (PMC) office).

- (i) A complaint form shall be filled, dated and signed, a copy of the same shall be deposited in the Supervising Engineer's office and a copy sent to MiDA ESP.
- (ii) An acknowledgement of complaint form shall also be filled, signed and given to the complainant. Within the designated two weeks, the contractor shall rectify the anomaly. The monthly report will contain the complaint, the solution proffered, and the results of follow-up to determine whether the complainant is satisfied with the outcome. The location shall also be listed as a site to be inspected during the site inspection that precedes the monthly site meeting.

MiDA ESP will ensure that contractors' provide adequate information to affected communities in respect of names, telephone numbers, and office locations where questions and complaints can be directed. MiDA ESP will also ensure that contractors makes these information available by appropriate means including signboards, leaflets, community meetings, etc.

Grievances that are not related to involuntary resettlement will often be related to construction and community health and safety issues. Persons living and using a construction corridor may be disrupted by:

- Open trenches that block their accesses;
- Trenches that are left open for a longer period they become breeding places for mosquitoes and rodents and other pests;
- Disturbance of natural drainage patterns that causes flooding;
- Poor storage arrangements and stockpiling of materials that lead to obstruction of accesses and reduces visibility;
- Noise and dust;
- Disruption of pedestrian and vehicular traffic;
- Poor disposal of construction waste; and
- Misconduct by staff of works contractors, among others.

## 4.2 Complaint Lodged and Received at MiDA Office

A written, email, or verbal complaint shall be delivered to MiDA ESP unit<sup>6</sup>. This shall be recorded, dated and signed to acknowledge receipt. An acknowledgement of complaint form shall be sent by post to the complainant within two weeks. Within this timeframe, the Environmental and Social Performance Coordinator (ESPC) shall liaise with the project director or manager to have the issue(s) resolved. When a solution is reached, the complainant shall be informed verbally and/or in writing within a week thereafter. A written record of the proposed resolution shall be made. The solution proffered shall be recorded and dated. The ESPC will follow up to find out whether the complainant is satisfied, and the results of the follow-up will be recorded.

For construction issues, the responsible MiDA program director or manager shall investigate the issue with the appropriate project management consultant and ensure that the proffered solution is communicated to the contractor through a site instruction. The monthly site report for the month in question shall report on the complaint and what has been done to remedy the situation. A visit to the location of the problems shall be included in areas to be visited during the monthly site inspections that precedes the monthly site meeting that shall be attended by ESP staff to verify confirmation of the resolution to the issue(s).

## 4.3 Project-level Grievance Redress

For issues that could not be resolved either directly with the works contractor on-site or through the established Grievance and Redress Mechanism at MiDA, a project level Grievance Committee (GC) will be set up to handle such cases. These committees will be set up at a location within the project area of influence so that stakeholders do not have to travel long distances to attend committees meeting.

The GCs will normally include a representative from each of the following:

- The local or municipal government representative;
- A representative of MiDA;
- An NGO working in the area;
- Representatives of affected stakeholder group within the project area of influence
- A valuer or a quantity surveyor who shall sit on the committee for resettlement and compensation issues.

The GC will be chaired by the representative of MiDA. Membership of the GC will be publicized throughout the sub-activity areas along with other details of the GRM. GCs will be mandated to provide a response within three (3) weeks of receiving formal notification of a grievance.

In cases, where further site visits, investigations, or discussions with the stakeholder are deemed necessary in order to arrive at an amicable resolution, a date should be planned with the complainant for the follow-up visit which should fall within the mandated three (3) weeks. If the stakeholder is not satisfied with the outcome of the GC,'s intervention in resolving the issue at hand, the stakeholder will be advised to seek redress through the appropriate **legal system**

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<sup>6</sup> MiDA occupies the 4<sup>th</sup> Floor Heritage Tower, 6<sup>th</sup> Avenue, Ridge Accra, Tel: 00233 302 666 619/666 534

## 5.0 MONITORING WITH AND REPORTING TO STAKEHOLDERS

### 5.1 Stakeholder Involvement in Project Monitoring

MiDA believes external monitoring of its environmental and social commitments has the potential of strengthening engagement with its stakeholders by increasing transparency and promoting trust. It also increases accountability of the project and the credibility of monitoring results. This process can encourage local stakeholders within the project's area of influence to take greater degree of responsibility for their environment and welfare in relation to the project, and to build their capacity to address issues that affect them.

Project monitoring will be centered on resettlement and related issues as well as community health and safety impacts. Impacts and risks related to pollution and waste management, community-worker relationships, management-worker relationships, management of drains and open trenches that serve as breeding places for mosquitoes and compliance with contractor work schedules and how they impacts on local community activities will also be monitored.

Monitoring shall comprise of the following groups;

- Representatives of stakeholder groups including project affected persons, women, youth and vulnerable groups;
- Representatives of NGO's and civil society organizations;
- Representatives of the Metropolitan, Municipal and District Assemblies within the project area of influence;
- MiDA (ESP, GSI, Infrastructure and Monitoring and Evaluation teams);
- Works contractors;
- Program Management Consultant; and
- EPA and Lands Commission, where necessary.

Since monitoring for environmental and social risks and impacts require some skill and level of understanding of the issues to be monitored, MiDA ESP will provide capacity building for representatives of the stakeholder groups on issues to be monitored and monitoring indicators including visual inspection around these issues. Visual field guides will be provided to the stakeholder groups involved in monitoring to assist in monitoring and to ensure fair, objective, and transparent outcomes of the monitoring activities.

MiDA expects to receive objective assessment and feedback of its environmental and social mitigation measures, incorporate the concerns and inputs of stakeholders, report back to them and build strong local stakeholder support for its interventions on on-going bases within the life of project.

Joint monitoring involving all stakeholder groups as indicated above shall be organized bi-annually. However, for any issue requiring immediate attention such as accidents, major spills, and community agitations and unrest with respect to the practices of contractors, MiDA ESP shall convene an emergency joint monitoring involving the identified stakeholders to ascertain the issues and provide a resolution as needed.

## 5.2 Reporting to Stakeholders

MiDA's principal objective of reporting to stakeholders is to inform the various groupings as to how their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how project impacts are being monitored. It is also aimed at improving transparency in MiDA's operations and projects with its stakeholders, promote trust, and strengthen engagement with stakeholders within the life of the Compact.

In reporting to stakeholders on project planning and implementation, especially with respect to how issues of concern to them have been taken on board, MiDA will consider the following internationally accepted good practice:

- Determine what information needs to be reported to which stakeholders, by what method and frequency of reporting;
- Disclose progress to affected and interested parties. In particular, publicize any material changes to commitments and/or implementation actions that vary from publicly disclosed documents;
- Make monitoring results publicly available, especially reports of any external monitors;
- Regularly report on the process of stakeholder engagement as a whole, both to those stakeholders who are directly engaged, and to other interested parties; and
- Translate information reported to stakeholders into local languages and easily understandable formats.