

STAKEHOLDER ENGAGEMENT PLAN

Environmental Health and Pollution
Management Project (EHPMP)

P167788

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1 Introduction

The Environmental Health and Pollution Management Programme (EHPMP) aims to strengthen the institutional capacity to manage and regulate mercury use in the Artisanal and Small-scale Gold Mining (ASGM) and unintentionally produced Persistent Organic Pollutants (uPOPS) in e-waste (electronic and electrical waste) in the Republics of Ghana, Senegal, Kenya, Zambia and the United Republic of Tanzania specifically. The country specific activities involving ASGM will be implemented in Tanzania and Ghana, while activities focused on e-waste will be implemented in Ghana, Zambia, Kenya and Senegal.

The EHPMP comprises four components:

Component 1: Institutional strengthening, knowledge and capacity building

Component 2: Policy dialogue and regulatory enhancements

Component 3: Demonstrating application of technological tools and economic approaches - for reduced environmental health risks due to mercury and e-waste

Component 4: Project coordination and management

Under component 3 specific community-focused cleaner technology demonstration activities in contaminated areas, selected and designed based on environmental health risks and cost effectiveness of interventions will be implemented. The pilots will be directly connected to ongoing and proposed Bank operations in each participating country: Tanzania- Resilient Natural Resources Management for Tourism and Growth Project (REGROW – P150523); Ghana - Artisanal and Small-scale Mining Formalization (P168002) and Forestry Investment Program (FIP) (additional financing) Enhancing Natural Forest and Agroforest Landscapes Project (P163745); Zambia – Mining and Environmental Remediation and Improvement Project (P154683); Senegal –Municipal Solid Waste Management Project (P161477).

The EHPMP is being prepared under the World Bank's Environment and Social Framework (ESF), which came into effect on October 1, 2018. As per the Environmental and Social Standard: ESS 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. A Stakeholder Engagement Plan (SEP) has been prepared for each country to keep stakeholders informed on the project progress. This is meant to ensure appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner format. Stakeholders will be actively involved in decision making and project implementation processes through the ongoing Bank-funded projects linked with each of the pilots and where necessary existing mechanisms will be enhanced or additional mechanisms developed to align with ESS 10.

This EHPMP SEP includes the individual SEPS for each of the participating countries.

2 Zambia SEP

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ACRONYMS

AP	Aggrieved Party
CBEs	Community Based Enterprise
CBO	Community Based Organisation
CC	Compensation Committee
CEP	Copperbelt Environment Project
CLO	Community Liaison Officer
DDCC	District Development Coordinating Committee
EHPMP	Environmental Health and Pollution Management Project
ESIA	Environmental and Social Impact Assessment
FDI	Foreign Direct Investment
FGRM	Feedback and Grievance Redress Mechanism
GC	Grievance Committee
GIR	Grievance Investigation Report
GRFF	Grievance Redress/Feedback Form
GRS	Grievance Redress Service
MWDSEP	Ministry of Water Development, Sanitation, and Environmental Protection
MSD	Mines Safety Department
NDP	National Development Plan
NPC	National Project Coordinator
PDCC	Provincial Development Coordinating Committee
PF	Process Framework
PCU	Project Implementation Unit
WDC	Ward Development Committee
ZEMA	Zambia Environmental Management Agency

I. INTRODUCTION

1.1 Background

The Africa Environmental Health and Pollution Management Programme (EHPMP) is a World Bank financed programme which aims to strengthen the institutional capacity to manage and regulate mercury use in ASGM and POPs/UPOPS in e-waste (electronic and electrical waste) in the Republics of Ghana, Senegal, Kenya, Zambia and the United Republic of Tanzania specifically. The country specific activities involving ASGM will be implemented in Tanzania and Ghana, while activities focused on waste will be implemented in Ghana, Zambia, Kenya and Senegal.

In Zambia, the EHPMP is a Government of the Republic of Zambia project financed by the World Bank's International Development Association (IDA) credit and grant in the amounts of US \$8.256 million. ZEMA will be implementing this project in collaboration with the Ministry of Mines and Mineral Development, Ministry of Water Development and Environmental Protection and the Ministry of Local Government through the targeted Municipal Councils.

The EHPMP is being prepared under the World Bank's new Environment and Social Framework (ESF), which came into effect on October 1, 2018, replacing the Bank's Environmental and Social Safeguard Policies. Under the ESF, projects such as TREP must comply with ten Environmental and Social Standards (ESS) in investment project lending financed by the Bank.

The EHPMP comprises four components:

Component 1: Institutional strengthening, knowledge and capacity building

Component 2: Policy Dialogue and Regulatory Enhancements

Component 3: Demonstrating application of technological tools and economic approaches - for reduced environmental health risks due to mercury and e-waste

Component 4: Project Coordination and Management

1.2 Project Summary

The EHPMP is aligned with and will support the objectives of Pillars 1 and 2 of the Bank's Africa Strategy – competitiveness and employment, and vulnerability and resilience, and the foundations of the strategy – governance and public-sector capacity. EHPMP will promote sustainable inclusive growth by improving access to environmental services through knowledge sharing and capacity building. EHPMP will further strengthen human capital by improving health of vulnerable populations, especially children. The EHPMP will complement other regional initiatives and individual projects, focusing on competitiveness, sustainability and governance.

The EHPMP will contribute to the GEF 6 Chemicals and Waste Focal Area Strategy that aims to achieve the long-term goal “to prevent the exposure of humans and the environment to harmful chemicals and waste of global importance including POPs, mercury and ozone depleting substances.”

The project is consistent with the Country Partnership Framework (FY19-FY23) that aims to help the Government of Zambia address the development challenges in its priority areas identified in the Seventh National Development Plan. The project will directly contribute to the CPF's focus area 1 “More even territorial development: Opportunities and Jobs for the poor”. Furthermore, Zambia recognizes that the challenges in pollution management facing the country require increasing efforts

to reach a sustainable future growth scenario. The national development strategy identifies improper solid waste management as a health risk to the affected communities, further highlighted in the National Solid Waste Management Strategy (NSWMS) of 2004 which sets out an integrated approach to addressing the problem. The EHPMP is aligned with the second National Implementation Plan (NIP) for Zambia (2017), which sets out the roadmap and methodology for implementing the Stockholm Convention in the country. The NIP identified a need to strengthen environmental monitoring capacity, mechanisms and enforcement capacity of responsible institutions, as well as increase the level of awareness on the health risks associated with POPs and chemical pollution.

1.3 Objectives of Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which EHPMP ZEMA (project team) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about EHPMP project and any activities related to the project.

The involvement of the local population is essential to the success of the project(s) in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

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

- 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 influence project planning and design;
- 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.

2. World Bank requirements for stakeholder engagement

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by the 2018 ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the

development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS10 include:

- “Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project.”
- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.”

Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

3 Stakeholder Identification, Analysis and Communication Methods

3.1 Project stakeholders

Project stakeholders are ‘people who have a role in the Project, or could be affected by the Project, or who are interested in the Project’. Project stakeholders can be grouped into primary stakeholders who are “...individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly”... especially... “those who are directly affected, including those who are disadvantaged or vulnerable” and secondary stakeholders, who are “...broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them”.

Thus, Project stakeholders are defined as individuals, groups or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
- (ii) may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project.

Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. The legitimacy of such representatives may stem both from their official elected status and their informal and widely supported standing within the community that allows them to act as focal points of contact in Project's interaction with its stakeholders. Examples of legitimate stakeholder representatives include and are not limited to:

- elected officials of regional, local, and village councils and self-governance bodies;
- leaders of informal or traditional community institutions such as village headpersons or chiefs of the communes;
- non-elected leaders that have wide recognition within their community, such as chairpersons of local initiative groups, committees, local cooperatives etc.;
- leaders of community-based organizations, local NGOs and women's groups;
- the elders and veterans within the affected community;
- religious leaders, including those representing traditional faiths;
- teachers and other respected persons in the local communities, etc.

Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

3.2 Methodology for Stakeholder Engagement

3.2.1 Main Principles

In order to meet best practice approaches, ZEMA will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for

communicating stakeholders' feedback, for analyzing and addressing comments and concerns;

- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project(s) is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse ethnic groups.

3.3 Stakeholder Identification and Analysis

Stakeholder engagement process for the EHPMP in Zambia will start from identification, mapping and analysis. It is anticipated that this Stakeholder Engagement Plan (SEP) will help clarify the stakeholder identification procedure at the national level for the forthcoming stages. This will guide ZEMA and allow complying with above cited commitments (national and international). The following criteria, adjusted to take account of local specific conditions, are proposed to be used for the identification of stakeholders:

- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- **Influence:** a social group may be able to substantially influence project implementation or on-going operations ;
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or on-going operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or on-going operations, and this group is not necessarily directly affected by the planned or current activities

A general list of stakeholder groups identified is presented in Table 1 below.

Table 1 Stakeholder groups and interest in engagement

Stakeholder group	Interest/cause in engagement
International level	
Environmental and societal NGOs Pace International Secretariat for Basal, Stockholm and Rotterdam Convention CASC Secretariat COMESA	Scientific understanding of the range or problems associated with the project(s).

Stakeholder group	Interest/cause in engagement
National level	
Government Ministries and Administration	Legislative and executive authorities. Functions of supervision and monitoring
NGOs/CBOs	Represents the interests of different interested parties and vulnerable groups
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer(s) and for information disclosure in connection with the proposed project(s).
Academic, Research and Scientific Institutions	Scientific understanding of the range or problems associated with the proposed project(s). Scientific approach to the relevant issues. Possible specialists' provision for further activity in project implementation.
Business community / Private sector	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Project employees and Project's sub-contractors	Technical understanding of the range or problems associated with the proposed project(s) including H&S issues.
Regional and district level	
Administration of central province Government Ministries in Central province	Legislative and executive authorities. Functions of supervision and monitoring
District Administration of Kabwe	Legislative and executive authorities. Functions of supervision and monitoring
Local NGOs/CBO/faith-based institutions	Represents interests of different interested parties and vulnerable groups
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Local communities	Interested parties living in regions of seismic activities that could be indirectly affected by the realization of the projects
Local level	
Area Member of parliament Area counselor	Represents interests of affected communities (land users) and vulnerable groups
Local Business community / Private sector including chain Stores	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.

Stakeholder group	Interest/cause in engagement
Local land users and other local population	Potential vulnerable groups, affected communities and other interested parties living in the close vicinity to seismic study activity

3.4 Stakeholder Categorisation

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project(s).

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project(s) and will enable the project(s) to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community’s and institutional endorsement of the project(s) by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

A description of the aforementioned stakeholder groups is provided in the **Annex 1**.

3.4.1 Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project during electrification activities. Specifically, the following individuals and groups fall within this category:

- Communities in the vicinity of the project’s planned activities;
- The local population and local communes;
- Residents, business entities, and individual entrepreneurs in the area of the project that can benefit from the employment, training and business opportunities;
- Government officials, including Municipal Administration of the in the project area, village administrations, environmental protection authorities;

¹ Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- Community-based groups and non-governmental organizations (NGOs) that represent local residents and other local interest groups, and act on their behalf; and
- ZEMA employees and contractors.

Local NGOs and initiative/advocacy groups represent the considerable capacity that the project(s) may tap for disseminating the information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established interaction with the local communities, are able to propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication, and possess the facilitation skills that may be utilized as part of the project's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed project(s) to the local communities, including in the remote areas (e.g. by placing information materials about the project in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

3.4.2 Other Interested Parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Residents of the other rural settlements within the project area, who can benefit from employment and training opportunities stemming from the project;
- Civil society groups and NGOs on the regional, national and local levels, that pursue environmental and socio-economic interests and may become partners of the project . Organizations within this group are likely to be located outside the project's Direct Area of Influence;
- Business owners and providers of services, goods and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future;
- Government of the Zambia – government officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities.
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.

3.4.3 Vulnerable Groups

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the project. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc.

Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project Area of Influence, the vulnerable groups may include and are not limited to the following:

- Elderly people and veterans of war;
- Persons with disabilities and their caregivers;
- Low-income families dependent on state support;
- Women-headed households or single mothers with underage children;
- The unemployed persons.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

This section describes stakeholder engagement activities that will be implemented by ZEMA going forwards, including activities tailored to the specific project phases/developments as well as the on-going routine engagement.

4 Stakeholder Engagement Program

4.1 Engagement Methods and Tools

The project(s) intend to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with statutory officials may be different from a format of liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The format of every consultation activity should meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. Since their vulnerable status may lead to people's diffidence and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings.

4.1.1 Description of Engagement Methods

Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions.

International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. In order to fulfil this requirement, a range of consultation methods are applied that specifically focus on this approach.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community.

These parameters can be achieved by implementing the following approach:

- Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for the accountability and reporting purposes. Existing notice boards in the communities may be particularly useful for distributing the announcements, such as boards adjacent to the widely visited public premises – post offices, chain stores, transport links, and offices of the local NGOs. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by passers or covered by other advertisements. The project's staff will therefore maintain regular checks in order to ensure that the notifications provided on the public boards remain in place and legible.
- Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the proposed. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected community representatives/ local NGOs/faith based organisations and initiative groups to relay up-to-date information on the project and consultation meetings to other members of the community, Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.
- Placement of the project materials in the public domain is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected community and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed

consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

- Drafting an agenda for the consultation meeting is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project becomes an appropriate material for inclusion in the project's regular reporting to the stakeholders.
- Distribution of targeted invitations to the consultation meeting or a hearing is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of authorities, leaders of local NGOs and initiative groups, village chairpersons) and as public invites (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Text of individual invitations can be tailored to reflect the specifics of an invitee and their role in the process, whereas the text of public invitations normally indicates general details. Means of distributing the invitations should be appropriate to the customary methods of communication that prevail locally in the Project Area of Influence (PAI). Depending on the availability and technical feasibility, the following means of distribution can be used: direct mail (post); as an inclusion with other existing public mailings, utility bills, or circulates from a local authority. The invitation should typically contain a clear request for confirmation of the participation, also specifying a date by which the confirmation is expected. All invitations that were sent out are tracked in order to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

ZEMA/PCU will use a range of techniques to fulfill the main purpose of its consultation activities aimed at raising the community's and stakeholder awareness about the planned and current activities undertaken by the project, as well as to solicit public feedback that can subsequently be input into the project's mitigation and enhancement measures. As discussed above, due consideration will be given to the cultural appropriateness and inclusiveness of the consultation settings as well as gender and other sensitivities that may prevail in the local communities. Knowledge and advice of the community representatives and local NGOs are invaluable to ensure that these aspects are fully observed. If deemed necessary, separate meetings and focus group discussions will be held, as described above.

An attendance list is made available at the commencement of the consultation/hearing in order to record all participants who are present at the meeting and their affiliation. Wherever possible,

attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting or a hearing should be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies. Where technical specifics of the project's particular activities or solutions are required to be delivered in a greater level of detail, it will be ensured that the information conveyed remains comprehensible to all members of the audience and that the description of complex technicalities is adapted to their level of understanding, thereby enabling productive feedback and effective discussion.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentation and any demonstrations involved. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- taking written minutes of the meeting by a specially assigned person or a secretary;
- audio recording (e.g. by means of voice recorders); and
- photographing.

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, the video recording may also be undertaken. Combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

As a possible option in addition to the Q&A session nearer the close of the public meeting/hearing, evaluation (feedback) forms may be distributed to participants in order to give them an opportunity to express their opinion and suggestions on the project. This is particularly helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in public.

Questions provided in the evaluation form may cover the following aspects:

- Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- How did they learn about the Project and the consultation meeting?
- Are they generally in favour of the Project?

- What are their main concerns or expectations/hopes associated with the Project or the particular activity discussed at the meeting?
- Do they think the Project will bring some advantages to their community as a whole?
- Is there anything in the Project and its design solutions that they would like to change or improve?
- Do they think that the consultation meeting has been useful in understanding the specific activities of the Project, as well as associated impacts and mitigation measures? What aspects of the meeting they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that filling the form is optional. Some persons may be willing to express their feedback verbally and in this case a member of Project staff will be allocated to take notes.

A summary description of the engagement methods and techniques that will be applied by project developer is provided in Table 2 below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

Table 2: Methods, Tools and Techniques for Stakeholder Engagement

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Provision				
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	<p>Printed materials present illustrative and written information on Project activities, facilities, technologies and design solutions, as well as impact mitigation measures.</p> <p>Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects.</p> <p>Information may be presented both in Russian and Tajik for local and national stakeholders, and in English for international audience.</p>	<p>Distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in remote areas.</p> <p>Placement at the offices of local administrations and NGOs, libraries and other public venues.</p>	<p>Households in Project Area of Influence.</p> <p>Residents of Kabwe town, as well as wider stakeholders in Zambia.</p>
Distribution of printed public materials: newsletters/updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	<p>Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals.</p> <p>Means of distribution – post, emailing, electronic subscription, delivery in person.</p> <p>The mailed material can be accompanied by an enclosed postage-paid comment/feedback</p>	<p>Households in Project Area of Influence.</p> <p>Public venues in Project Area of Influence – local authority offices, libraries.</p> <p>Residents in project area</p>

			form that a reader can fill in a return to the Project's specified address.	
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the community.	Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience	Residents in project area
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development updates, solutions for impact mitigation. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences.	Residents in project area General citizenry of Zambia
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/impact management measures. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities in in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Authorities and other governmental bodies.
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	Directly affected communities in the project area

Information Feedback

<p>Information repositories accompanied by a feedback mechanism</p>	<p>Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.</p>	<p>Various Project-related materials, ESMF documentation, environmental and social action plans.</p>	<p>Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.</p>	<p>Directly affected communities in the project area</p>
<p>Dedicated telephone line (hotline)</p>	<p>Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection.</p>	<p>Any issues that are of interest or concern to the local communities and other stakeholders.</p>	<p>Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.</p>	<p>Local communities within the Project Area of Influence. Any other stakeholders and interested parties within Kabwe and Zambia in general.</p>
<p>Internet/Digital Media</p>	<p>Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in two languages – Bemba(language</p>	<p>Information about Project operator and shareholders, Project development updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.</p>	<p>A link to the Project web-site should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.</p>	<p>Affected communities, Project stakeholders and other interested parties that have access to the internet resources.</p>

	commonly used in project area) and in English for both local and international stakeholders.			
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project and related solutions/impact management measures. Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups or community-wide. Administering questionnaires as part of the household visits.	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence.
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence.
Consultation & Participation				
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in	Directly affected communities in the Project Area of Influence. Other communities within the Project Area of Influence. Residents in the Project Area of Influence

			advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	
Household visits	Household-level visits can be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from community members and vulnerable persons who may be unable to attend the formal hearing events.	Description of the Project and related solutions/impact management measures. Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	Visits should be conducted by Project's designated staff with a specified periodicity.	Directly affected in the Project Area of Influence.
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	Directly affected households in the Project Area of Influence, youth, elderly, women, and other vulnerable groups.
Information centres and field offices	Project's designated venue for depositing Project-related information that also offers open hours to the community and other members of the public, with Project staff available to respond to queries or provide clarifications.	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the Project Area of Influence and any other stakeholders and interested parties.
Site Tours	Visits to Project Site and facilities organised for local communities,	Demonstration of specific examples of Project's design	Targeted invitations distributed to selected audience offering an	Local communities within the Project Area of Influence. Elected officials.

	<p>authorities and the media to demonstrate Project solutions.</p> <p>Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.</p>	<p>solutions and approaches to managing impacts.</p>	<p>opportunity to participate in a visit to the Project Site.</p> <p>Limitation: possible safety restrictions on the site access during active construction works.</p>	<p>Media groups.</p> <p>NGOs and other initiative groups.</p>
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4.1.2 *Description of Information Disclosure Methods*

As a standard practice, the Project materials (ESMF, ESMP, SEP, RFP or RAP) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the project developer in a formal manner.

The project developer will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development.

The ESMF report (together with the associated environmental and social management plan – ESMP) in Bemba, and English will be made available for public review for the period of 60 days in accordance with the international requirements. Subject to the disclosure will also this Stakeholder Engagement Plan. The SEP will be released in the public domain simultaneously with the ESMF and ESMP reports and will be available for stakeholder review during the same period of time, i.e. 60 days.

Distribution of the disclosure materials will be through making them available at venues and locations frequented by the community and places to which public have unhindered access. Free printed copies of the ESMF/ESMPs and the SEP in Bemba will be made accessible for the general public at the following locations:

- ZEMA, Information and Documentation Centre in Lusaka;
- Kabwe Municipal Council
- ZEMA website: www.zema.org.zm; and
- Regional administrations
- Local NGO offices in Kabwe; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the ESMF, ESMP, NTS, RFP, RAP (as required) and SEP will be placed on the ZEMA/PCU web-site www.zema.org.zm. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The web-site will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs as well as other interested parties.

4.1.3 *Timetable for Disclosure*

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within a timeframe that shall be agreed upon :

- Placement of the ESMF (including ESMP and RPF), and SEP in public domain – Dates to be confirmed in final SEP.
- 60-day disclosure period – Dates to be confirmed later in final SEP.
- Public consultation meetings in project affected communities and with other stakeholders to present and discuss findings of the ESMF and measures proposed in the ESMP - Dates to be confirmed in final SEP.

- Addressing stakeholder feedback received on the entire disclosure package - Dates to be confirmed in final SEP.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project’s evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 3 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 3 Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Local population in the Project Area of Influence	International ESMF, ESAP/ESMP, and Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. Electronic publications and press releases on the Project web-site. Dissemination of hard copies at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures. Separate focus group meetings with vulnerable groups, as appropriate.
Non-governmental and community-based organizations	ESMF, ESMP, RFP, RAP (if triggered), and Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. Electronic publications and press releases on the project web-site. Dissemination of hard copies at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures.
Government Ministries/authorities and agencies	ESMF, ESMP, Executive Summary, and Stakeholder Engagement Plan; Regular updates on Project development; Additional types of Project’s information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESMF, ESMP, RFP package, and SEP at municipal administrations. Project status reports. Meetings and round tables.
Related businesses and enterprises	Stakeholder Engagement Plan;	Electronic publications and press releases on the Project web-site. Information leaflets and brochures.

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
	Public Grievance Procedure; Updates on Project development and tender/procurement announcements.	Procurement notifications.
Project Employees	Employee Grievance Procedure; Updates on Project development.	Staff handbook. Email updates covering the Project staff and personnel. Regular meetings with the staff. Posts on information boards in the offices and on site. Reports, leaflets.

4.2 Planned stakeholder engagement activities

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them.

Table 4 presents the stakeholder engagement activities ZEMA/PCU will undertake for their project(s). The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

Table 4 Planned stakeholder engagement activities

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
STAGE 1: PROJECT PREPARATION (PROJECT DESIGN, SCOPING, , ESMF/RPF/SEP DISCLOSURE)	Project Affected People: People potentially affected by land acquisition People residing in project area Vulnerable households	ESMF, ESMP, RPF, SEP, RAP (if triggered) disclosures Land acquisition process Assistance in gathering official documents for authorized land uses Compensation rates, methodology Compensation packages Project scope and rationale Project E&S principles Resettlement and livelihood restoration options Grievance mechanism process	Public meetings, separate meetings for women and vulnerable Face-to-face meetings Mass/social media communication (as needed) Disclosure of written information: brochures, posters, flyers, website Information boards or desks - In Kabwe Grievance mechanism ZEMA monthly newsletter	In Kabwe for disclosure of Drafts ESMF, RPF, SEP, RAP (if triggered) In Kabwe at beginning of construction that would affect the area Continuous communication through mass/social media and routine interactions Throughout RAP development as needed	ZEMA HSE team CLO Specialists responsible for land acquisition RAP consultant
	Other Interested Parties (External) Kabwe and central province in general Representatives in communities	ESMF, ESMP, RPF, SEP, disclosures Land acquisition process Identification of land plots and uses Resettlement and livelihood restoration options (if needed) Project scope, rationale and E&S principles Grievance mechanism process	Face-to-face meetings Joint public/community meetings with PAPs	Throughout RAP development as needed Project launch meetings in Kabwe Quarterly meetings in affected communities and Kabwe Disclosure meetings in Kabwe and central province	ZEMA E&S Team & management CLO Specialists responsible for land acquisition RAP consultant
	Other Interested Parties (External) Press and media	ESMF, ESMP, RPF, SEP, RAP disclosures Grievance mechanism	Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable as needed)	Project launch meetings in Kabwe	ZEMA HSE team CLO

<i>Stage</i>	<i>Target stakeholders</i>	<i>Topic(s) of engagement</i>	<i>Method(s) used</i>	<i>Location/frequency</i>	<i>Responsibilities</i>
	NGOs Businesses and business organizations Workers' organizations Academic institutions National Government Ministries Zambian Government Departments General public, jobseekers	Project scope, rationale and E&S principles	Mass/social media communication Disclosure of written information: Brochures, posters, flyers, website Information boards or desks in Kabwe Grievance mechanism Notice board for employment recruitment	Meetings in affected communities and Kabwe in general as needed Communication through mass/social media (as needed) Information desks with brochures/posters in affected communities	
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Other project developers, donors	Legal compliance issues Project information scope and rationale and E&S principles Coordination activities Land acquisition process Grievance mechanism process ESMF/ESMP/RPF/SEP disclosures	Face-to-face meetings Invitations to public/community meetings Submission of required reports	Disclosure meetings Reports as required	ZEMA HSE team CLO
	Other Interested Parties (Internal) Other ZEMA staff Supervision Consultants Supervision contractors, sub-contractors, service providers, suppliers, and their workers	Project information: scope and rationale and E&S principles Training ESMF/ESMP requirements and other management plans Grievance mechanism process E&S requirements Feedback on consultant/contractor reports	Face-to-face meetings Trainings/workshops Invitations to public/community meetings	As needed	ZEMA HSE team and project management team CLO

<i>Stage</i>	<i>Target stakeholders</i>	<i>Topic(s) of engagement</i>	<i>Method(s) used</i>	<i>Location/frequency</i>	<i>Responsibilities</i>
STAGE 2: CONSTRUCTION AND MOBILIZATION ACTIVITIES	Project Affected People People potentially affected by project activities People residing in project area Vulnerable households	Grievance mechanism Health and safety impacts (EMF, community H&S, community concerns) Employment opportunities Project status	Public meetings, open houses, trainings/workshops Separate meetings as needed for women and vulnerable Individual outreach to PAPs as needed Disclosure of written information: brochures, posters, flyers, website Information boards in Kabwe Notice board(s) at construction sites Grievance mechanism ZEMA monthly newsletter	Quarterly meetings during construction seasons Communication through mass/social media as needed Notice boards updated weekly Routine interactions Brochures in local offices	ZEMA HSE team and project management team CLO Supervision and RAP consultants Contractor/sub-contractors
	Other Interested Parties (External) Governmental committees for land use and compensation (MBC) Kabwe residents and representatives in communities	Project scope, rationale and E&S principles Grievance mechanism Project status World Bank compensation requirements	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction season)	ZEMA HSE team CLO Supervision and RAP consultants Contractor/sub-contractors
	Other Interested Parties (External) Press and media NGOs Businesses and business organizations Workers' organizations Academic institutions National Government Ministries Zambian Government Departments General public, jobseekers	Project information - scope and rationale and E&S principles Project status Health and safety impacts Employment opportunities Environmental concerns Grievance mechanism process	Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards in Kabwe Notice board(s) at construction sites Grievance mechanism	Same as for PAPs	ZEMA HSE team CLO

<i>Stage</i>	<i>Target stakeholders</i>	<i>Topic(s) of engagement</i>	<i>Method(s) used</i>	<i>Location/frequency</i>	<i>Responsibilities</i>
	Other Interested Parties (Internal) Other ZEMA staff Supervision Consultants Contractor, sub-contractors, service providers, suppliers and their workers	Project information: scope and rationale and E&S principles Training on ESMF/ESMP requirements and other sub-management plans Worker grievance mechanism	Face-to-face meetings Trainings/workshops Invitations to public/community meetings	Daily, as needed	ZEMA HSE team Supervisors
STAGE 3: OPERATION AND MAINTENANCE	Project Affected People: People residing in project area Vulnerable households	Satisfaction with engagement activities and GRM Grievance mechanism process Damage claim process	Outreach to individual PAPs ZEMA website Grievance mechanism ZEMA newsletter	Outreach as needed Meetings in affected Kabwe Communities (as needed/requested) Monthly (newsletter)	ZEMA HSE team
	Other Interested Parties (External) Press and media NGOs Businesses and business organizations Workers' organizations Academic institutions Local Government Departments in Kabwe General public	Grievance mechanism process Issues of concern Status and compliance reports	Grievance mechanism ZEMA website Face-to-face meetings Submission of reports as required	As needed	ZEMA HSE team & management

5 *Monitoring and Reporting*

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of the EHPMP project implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
 - Frequency of public engagement activities;
 - Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI);
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
 - Type of public grievances received;
 - Number of press materials published/broadcasted in the local, regional, and national media;
 - Amount of Project's charitable investments in the local communities in the Project Area of Influence.

Annex: List of Identified Stakeholders

National level

1. Zambia Environmental Management Agency
2. Ministry of Mines Minerals Development
3. Ministry of Water Development, Sanitation, and Environmental Protection
4. Mines Safety Department
5. Ministry of Education
6. Ministry of Local Government
7. Kabwe Municipal Council
8. Ministry of Labour
9. CropLife Zambia Limited
10. Zambia Association of Manufacturers
11. Zambia Chambers of Commerce
12. Chain Stores (super markets)
13. CSOs/CBOs/Faith based Organisations
14. Franchise Companies in Waste Management

International Level

1. SADC Secretariate
2. COMESA
3. Secretariate of UNSC-TDG
4. Secertariate of UNSC-GHS
5. International Pollutants Elimination Network (IPEN)
6. Scretariat for Basal,stockholm, Minamata and Roterdam Convention
7. PACE international
8. Rose Foundation

3. Senegal SEP

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INTRODUCTION

1. Contexte du projet :

Le Sénégal est l'un des pays africains les plus stables et les plus ouverts politiquement, ce qui a permis d'obtenir des résultats relativement satisfaisants en matière de gouvernance.

Cependant, le Sénégal fait encore face à de problèmes considérables pour la mise en œuvre efficace des politiques de développement.

Au Sénégal, pour les déchets solides, il n'y a pas de décharge contrôlée en exploitation. Les déchets solides de Dakar sont actuellement éliminés dans une vaste décharge à ciel ouvert, à Mbeubeuss, une banlieue densément peuplée de la capitale. Le site est une source de pollution de l'eau, de l'air et du sol, qui nécessite une gestion urgente en raison de son expansion continue.

Sous l'autorité institutionnelle du ministère chargé de la gouvernance locale, l'Unité de Coordination pour la Gestion des déchets solides (UCG) a été créée pour aider les collectivités locales à prendre en charge la gestion des déchets solides. L'objectif de l'UCG est de mettre en place un mécanisme visant à renforcer les capacités des communautés locales, qui pour la plupart font face à un déficit de capacités techniques, financières, logistiques, organisationnelles ainsi que des manquements dans la gestion de la santé publique.

À cet égard, l'UCG, en conformité avec le Plan Sénégal Emergent (PSE) et en parfaite cohérence avec la stratégie nationale, vise à mettre en œuvre le Programme national de gestion des déchets (PNGD) qui ambitionne, entre autres, à aider les communautés locales à améliorer leur cadre de vie.

Ainsi, en 2014, l'UCG a lancé une étude nationale qui a identifié et caractérisé, dans 48 villes, plus de 1 700 décharges non réglementées. Le taux moyen de collecte des déchets est de 40% dans les capitales régionales et 28% seulement dans les villes secondaires. Il y a une forte présence de récupérateurs de déchets sur les sites de déchets solides mixtes. La combustion à l'air libre est également pratiquée et il n'y a aucune sensibilisation sur la manipulation des déchets dangereux.

En outre, dans de nombreux endroits au Sénégal, les emballages en plastique et en métal contenant des produits chimiques dangereux sont réutilisés par les recycleurs qui, après rinçage, les revendent pour d'autres utilisations. Ceux-ci pourraient être considérés comme des déchets dangereux.

Cependant, à l'instar de plusieurs pays, le Sénégal a ratifié la Convention de Stockholm (CS) sur les polluants organiques persistants (POPs) en mai 2003. Il a élaboré son plan national de mise en œuvre, en 2005 avec l'aide du Programme des Nations Unies pour l'Environnement (PNUE) en tant qu'agence d'exécution du FEM. Il a déjà soumis la révision et la mise à jour de son plan national de la mise en œuvre de la CS pour remplir ses engagements vis-à-vis de ladite Convention. En vertu de la CS, 26 substances chimiques au total sont répertoriées comme POPs, y compris les pesticides (comme le DDT), les produits chimiques industriels (tels que les

biphényles polychlorés, les PCBs) et les sous-produits non intentionnels de processus industriels (tels que les dioxines et les furanes).

Les réformes permettant l'intervention des principales parties prenantes dans la gestion des déchets ne disposent toujours pas de mécanismes de mise en œuvre adéquats. Les politiques et les réglementations locales existantes en matière de gestion rationnelle des produits chimiques et des déchets dangereux doivent être soigneusement évaluées et révisées afin de garantir leur conformité avec les directives des conventions de Stockholm, de Rotterdam et de Bâle. Le PROMOGED (Promotion de la Gestion Intégrée et de l'Économie des Déchets - P161477) propose une série de réformes pour remédier aux carences institutionnelles, financières et réglementaires du secteur.

Cette situation appelle toutes les parties prenantes à s'impliquer et à agir ensemble, compte tenu du manque de coordination, de consultation, de mise en œuvre, de suivi et d'évaluation des mesures recommandées dans les divers documents d'aménagement du territoire. La gestion des déchets est la responsabilité de tous et pas seulement de la municipalité. La collaboration efficace des autorités locales, des municipalités, du secteur privé, des résidents et des organisations de la société civile est indispensable.

Dans ce contexte, avec une combinaison appropriée de politiques et d'actions, les zones péri-urbaines de Dakar telles que Hann Bel-Air, Dalifort et éventuellement d'autres zones peuvent être reconverties en zones de patrimoine paysager et culturel qu'elles étaient auparavant. Le développement d'activités génératrices de revenus, de loisirs (natation, voile, randonnée / promenade, golf) peut être encouragé car il s'agit de lieux de détente naturels.

Le présent Projet de Polluant Organiques Persistants Produits Non intentionnels (Environmental Health Pollution Management Program / Senegal – EHPMP) (P167788) financé par le Fonds pour l'environnement mondial (FEM) est conforme aux priorités du Sénégal en matière de gestion rationnelle des produits chimiques et des déchets dangereux. Il contribuera à la réalisation de l'ensemble des objectifs de développement du pays et impliquera tous les acteurs et toutes les parties prenantes dans le cadre d'un dialogue inclusif pour la gestion écologiquement rationnelle des produits chimiques et des déchets urbains dangereux. Il contribuera à réduire les risques sur la santé liés à l'environnement en réduisant les rejets de produits POPPNIs et autres produits chimiques toxiques.

Le projet régional s'appuiera et complétera les activités financées par la Banque mondiale à travers le PROMOGED qui a pour objectif l'amélioration des services de gestion des déchets solides dans certaines villes du Sénégal. Dans le cadre du PROMOGED, la Banque mondiale et d'autres bailleurs appuieront la mise en œuvre du PNGD en tant que deuxième phase d'une initiative financée par la Banque Islamique dans trois villes. Le PROMOGED portera sur les réformes sectorielles, les investissements en infrastructures et la gestion de toute la filière des déchets à Dakar et dans les villes / municipalités secondaires. Le PROMOGED financera la réhabilitation de la décharge de Mbeubeuss qui est l'un des principaux dépotoirs de déchets à

Dakar, et autres décharges, et l'établissement d'un nouveau système de gestion des déchets à travers un partenariat public-privé (PPP). La synergie des interventions du PROMOGED et du présent projet permettra d'améliorer à long terme la gestion des déchets solides à Dakar.

Le présent projet régional s'appuiera également sur le projet de décentralisation financé par l'IDA visant à accroître les ressources des administrations locales et à renforcer la transparence, la prévisibilité et la répartition équitable des transferts financiers de l'État aux administrations territoriales (Programme d'appui aux communes et agglomérations du Sénégal - PACASEN - P157097). Le PACASEN augmentera les ressources des gouvernements locaux et leur fournira davantage de ressources pour gérer l'environnement urbain.

Le "Practical Guidebook on Strategic Planning in Municipal Waste Management"² développé par la Banque mondiale fournira des informations utiles susceptibles d'accroître l'efficacité et l'efficience pour mettre en œuvre efficacement ce projet.

2. Description du Projet

2.1. Objectifs et composantes

L'objectif de développement du projet (ODP / PDO selon l'acronyme anglais) du EHPMP est de réduire les risques liés à la santé et à l'environnement en réduisant les rejets des Polluant Organiques Persistants Produits Non intentionnels (POPPNI / UPOPs selon l'acronyme anglais) et d'autres produits chimiques toxiques, et d'établir une gestion écologiquement rationnelle des déchets urbains.

Compte tenu des priorités immédiates du gouvernement sénégalais en matière de protection de l'environnement et de gestion de la pollution, le projet proposé comporterait les composantes suivantes vers l'atteinte de l'ODP :

Composante 1 : Renforcement institutionnel, renforcement des connaissances et des capacités en vue de minimiser les POPPNIs résultant de la combustion à ciel ouvert de déchets urbains et autres déchets toxiques (FEM : 1,5 million USD, cofinancement de 3,3 millions USD). Il est urgent de réformer le cadre juridique et de renforcer les capacités des acteurs du secteur afin de minimiser les POPPNIs résultant de la combustion à ciel ouvert de déchets urbains et autres déchets toxiques.

Composante 2 : Soutien au dialogue politique et aux améliorations de la réglementation (FEM: 1 million USD, cofinancement de 7 millions USD). Cette composante appuiera les efforts du Gouvernement visant à renforcer les politiques environnementales en vigueur, les réglementations ainsi que les capacités de contrôle, de sélection et d'évaluation des risques sur l'environnement et sur la santé associée aux POPs et aux déchets dangereux.

² Practical Guidebook on Strategic Planning in Municipal Waste Management

Composante 3 : Application d'outils technologiques (2,7 millions USD de FEM, 9,8 millions USD de cofinancement). L'objectif principal de cette composante est de soutenir et de mettre en œuvre des actions visant à mettre en place un système de gestion écologiquement rationnelle des déchets urbains pour réduire les risques sur la santé liés à la libération des POPPNIs et d'autres produits chimiques toxiques dans les municipalités de Hann Bel-Air, Dalifort et éventuellement autres communes de Dakar, qui pourra ensuite être répliqué et adapté à l'échelle nationale et régionale, y compris par le PROMOGED.

Composante 4. Coordination et gestion du projet (275 000 USD de financement du FEM, cofinancement de 1,0 million USD, dont 0,3 million USD de contrepartie en nature). Cette composante fournira les ressources nécessaires pour une coordination et une gestion efficace du projet ; suivi et évaluation au niveau national, local et régional ; et la coordination avec le PROMOGED.

2.2. Responsabilité institutionnelle de mise en œuvre

La Direction de l'environnement et des établissements classés (DEEC) est chargée de la mise en œuvre de la politique de l'Etat en matière de protection de l'environnement et des populations contre les pollutions, les nuisances et les déchets dangereux. La DEEC est aussi chargée de la gestion environnementale au niveau des établissements classés.

À cet égard, pour la mise en œuvre du projet GEF la DEEC sera l'autorité de mise en œuvre sous la supervision des municipalités en collaboration avec une ONG locale à sélectionner. La DEEC aura la responsabilité globale de la gestion financière.

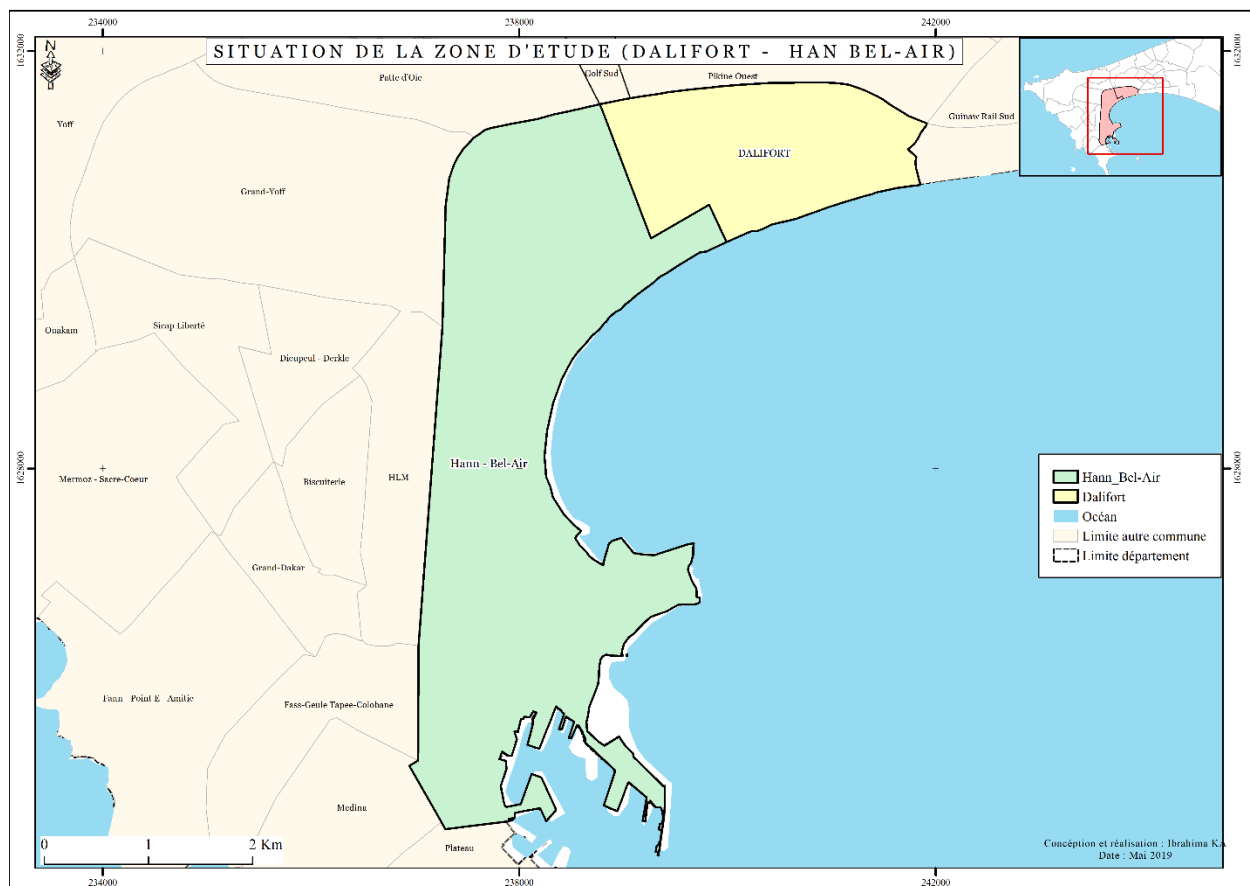
Un Comité de pilotage, présidé par le Ministre de l'Environnement ou son représentant, sera mis en place. Il aura pour rôle entre autres de fournir des orientations et une supervision globale du projet. Il comprendra des représentants de ministères en charge des finances, de l'hygiène publique, des collectivités territoriales, de la santé, etc. Il comprendra également des représentants de l'UCG, des maires de Hann-Bel Air et de Dalifort. Les fonctions du comité de pilotage sont les suivantes: (i) recevoir les rapports sur l'état d'avancement de la mise en œuvre des composantes du projet, afin de fournir des orientations générales sur les questions de politique liées à la réduction des risques pour la santé, à la libération des POPPNIs et d'autres produits chimiques toxiques; et (ii) Veiller à ce que les activités du projet soient incluses dans les plans de travail annuels afin de faciliter le transfert des tâches à la fin du projet; ainsi que (iii) assurer la coordination avec le projet régional pour faciliter le partage des connaissances entre les pays participants. La DEEC assurera le secrétariat du comité de pilotage. Le comité se réunira deux fois par an au minimum pour faciliter la bonne mise en œuvre des activités du projet.

Il sera mis en place aussi un Comité technique (CT) qui fournira des orientations techniques pour ce projet. Le CT constitue des représentants des principaux exécutants du projet ; y compris des représentants de la DEEC, des municipalités de Hann Bel-Air, de Dalifort, de l'UCG, de la Commission nationale de gestion des produits chimiques, de l'ADM (Agence de développement municipal), des ONGs, de l'ARD (Agence Régionale de Développement) et de toute autre

compétence jugée utile. Les membres du CT auront également des responsabilités clés dans la mise en œuvre du projet et fourniront des conseils techniques pour appuyer la prise de décision au niveau du comité de pilotage. La DEEC assurera la présidence du CT, qui se réunira deux fois par an au minimum, avant la réunion du comité de pilotage. Les fonctions du CT sont les suivantes: a) appuyer la DEEC dans l'exercice de sa fonction de coordination ; b) Fournir des conseils techniques et une supervision lors de la mise en œuvre des activités du projet ; c) Assurer la coordination sectorielle et intersectorielle des activités du projet ; d) Veiller à ce que les activités du projet soient intégrées aux plans et budgets sectoriels ; e) évaluer et recommander l'expertise technique nécessaire à la mise en œuvre des diverses activités du projet ; et f) Suivre de près les activités pour assurer le respect de la Convention de Stockholm.

2.3. Zones d'intervention du projet

Le présent projet sera mis en œuvre au niveau de deux communes pilotes de la région de Dakar : les communes de Hann Bel-Air et de Dalifort. Elles sont traversées par deux lacs qui constituent un prolongement de la zone des Niayes. Ce système de zones humides s'étend sur 1 700 m de long et 80 m de large et joue un rôle écologique important. Cependant, cette zone est soumise à une forte pression urbaine par une transformation rapide de son écosystème. Depuis les années 1980, la croissance urbaine exponentielle de Dakar a conduit à une perte importante de la biodiversité ; la plupart des zones naturelles ont été transformées en zones résidentielles. Ces conversions de terres humides en zones résidentielles ont été faites sans tenir compte des caractéristiques du sol et ont sérieusement affecté certaines activités telles que le maraîchage. Les dunes et les bassins de rétention ont disparu à la suite des travaux de terrassement. Les décharges incontrôlées se créent en mesure que les zones résidentielles se développent. Les déchets non collectés vont générer des sources de reproduction des moustiques et des conditions propices à la prolifération de vecteurs potentiellement porteurs de maladies et de nuisances, tels que les insectes et les rongeurs.



Carte N°1 : Situation de la zone d'étude (Dalifort – Hann Bel-Air)

BREVE DESCRIPTION DES ACTIVITES DE CONSULTATION ET DE PARTICIPATION

1. Résumé des activités déjà engagées

Une équipe pluridisciplinaire composée de représentants de la Banque mondiale, de la DEEC, des municipalités de Hann Bel-Air et Dalifort, est mise en place pour la préparation du projet. L'équipe est renforcée par des consultants dotés de compétences techniques et opérationnelles nécessaires pour appuyer la préparation du projet. La DEEC sera responsable de la mise en œuvre du projet avec l'ensemble des parties prenantes.

Un plan d'engagement environnemental et social ainsi que le plan d'engagement des parties prenantes (PEPP) sont en cours d'élaboration avec la consultation et la participation des parties prenantes impliquées dans la préparation du projet.

2. Activités envisagées

2.1. Information et sensibilisation sur les risques et impacts environnementaux et sociaux potentiels du projet

Les responsables des commissions de l'environnement et des affaires sociales qui sont des structures formelles dans les municipalités de Hann Bel-Air et Dalifort seront mises à contribution pour informer et sensibiliser les populations des zones concernées sur les risques et impacts potentiels du projet. Ils seront appuyés par les responsables des structures des ministères en charge de l'environnement, de l'hygiène, de la santé, etc. Les organisations de la société civile, ONG et associations aussi bien de niveau national et qu'intervenants dans les zones de mise en œuvre du projet seront fortement impliquées dans l'information, la sensibilisation et la formation sur la gestion des risques et impacts environnementaux et sociaux du projet.

2.2. Consultations formelles et informelles sur la base de stratégies de communication et de consultation des parties prenantes

Des réunions publiques et des ateliers d'information seront organisés régulièrement par les responsables des commissions de l'environnement et des affaires sociales et les responsables administratifs, les services techniques déconcentrées, les ONG/Associations, etc., sous la responsabilité de l'unité de coordination du projet (UCP) pour recueillir les avis, les préoccupations et les recommandations des populations des zones concernées sur la gestion des risques et les impacts environnementaux et sociaux potentiels. En sus, les autorités coutumières et religieuses, du fait de leur position, demeurent des partenaires stratégiques pour informer et sensibiliser les populations de leurs localités respectives.

2.3. Identification et analyse des parties prenantes

2.3.1. Parties affectées potentielles

- Les maraichers et les techniciens horticoles qui s'activent dans la zone d'intervention du projet qui du fait de l'insuffisance du système de communication et/ou de l'information pourraient être oubliés ou exclus des activités du projet.
- Les artisans et autres acteurs du secteur informel risquent d'être impactés

2.3.2. Parties engagées

- o Les communautés locales des zones d'intervention du projet
- o Les autorités locales (communes)
- o Les services techniques déconcentrés : les responsables centraux et déconcentrés des Ministères en charge de l'environnement, de l'hygiène, de la santé, etc.
- o Les autorités municipales, etc.
- o Les associations sportives et culturelles, ONG, autres Associations et Organisation de la Société Civile (OSC) seront mises à contribution pour les activités de mise en œuvre, de suivi et de contrôle ;

2.3.3. Groupes ou personnes vulnérables

Les personnes vivant avec un handicap et autres groupes et personnes vulnérables à identifier sur la base de critères de vulnérabilité préalablement convenus avec les services de l'action sociale.

3. Plan d'Engagement des Parties Prenantes - PEPP

3.1. But et calendrier du plan

Le but du PEPP est d'identifier les parties prenantes, de définir les rôles et les responsabilités des différents acteurs intervenant dans la mise en œuvre ainsi que les échéances d'exécution et les coûts (au besoin) des activités.

Sous la responsabilité du Coordonnateur du projet, le PEPP sera traduit en un programme d'activités budgétisés qui définit clairement les étapes de réalisation du projet (début et fin des activités), les coûts des différentes interventions ainsi que les responsabilités des parties prenantes. Le présent PEPP devrait être revu et mis à jour tout au long du cycle de vie du projet. Au cours de ce processus, l'orientation et la portée du PEPP peuvent changer pour refléter les différentes étapes de la mise en œuvre du projet et pour englober tout changement dans la conception du projet.

3.2. Stratégie pour la divulgation de l'information sur la gestion des risques et impacts environnementaux et sociaux

a. Messages clés

Les messages clés devront être développés car chaque composante sera préparée plus en détail lors de la mise en œuvre. Les éléments suivants sont des messages clés pertinents pour les différentes composantes du projet, et dans le but d'informer les parties prenantes du projet sur l'activité planifiée tout au long du cycle du projet.

- Qu'est-ce que le projet EHPMP? Informez-vous sur le projet.
- Quels sont les composantes du projet?
- Faire partie de la planification du projet – participer aux consultations.
- Présenter et discuter des impacts environnementaux et sociaux au cours des phases de construction et d'exploitation et des mesures d'atténuation respectives.
- L'appui de la Communauté pendant la mise en œuvre du projet est important.
- Les possibilités d'offres d'emploi du projet seront annoncées par l'entrepreneur ou l'Unité de Coordination du Projet (UCP).

b. Format d'information et méthodes de diffusion

Le projet EHPMP combinera différentes méthodes de diffusion de l'information. Il utilisera des méthodes de communication écrites et visuelles, ainsi que des communications par la télévision, la radio et d'autres canaux de communications.

c. Communication écrite et visuelle:

- **Résumé** – un résumé non technique permettra de diffuser les informations du projet de façon concise sans utilisation de termes trop techniques.
- **Panneaux d'affichage** - les panneaux d'affichage peuvent bien fonctionner dans les collectivités territoriales et impliquent aussi la diffusion d'informations par le biais d'affichages dans les centres communautaires, les écoles locales et les entrées des lieux de travail. C'est une bonne méthode pour diffuser les informations relatives au calendrier et à la durée des travaux, jusqu'aux prochaines réunions, l'état d'avancement, et d'autres informations.
- **Lettres** – peuvent être utilisées pour transmettre des messages très spécifiques. Alternativement, cela est utilisé comme une méthode formelle pour demander de l'information et inviter les parties prenantes à participer à des événements de consultation.
- **Courriels** -largement utilisés pour la communication avec les agences gouvernementales, les ONG et d'autres acteurs institutionnels. Le partage d'informations, la sollicitation d'experts sur les sauvegardes et la divulgation de documents de sauvegardes directement aux principales parties prenantes peuvent être effectués efficacement par courriel. En outre, la communication par courriel offre un accès direct aux parties prenantes lors de l'organisation de réunions.
- **Journaux**-les journaux sont généralement bien adaptés pour les annonces formelles ou pour atteindre un large éventail de parties prenantes rapidement. Il est important que le contenu du message soit soigneusement compilé, car il s'agit d'un moyen de communication à sens unique et peut rapidement causer un malentendu ou une

confusion si le message n'est pas clairement écrit. Le projet EHPMP peut divulguer les informations clés (y compris les annonces de réunions de consultation) via les quotidiens de la place qui sont considérés comme les journaux nationaux les plus populaires au Sénégal.

d. Les médias

Les principaux éléments des médias sont la radio et la télévision qui constituent de bons moyens pour la sensibilisation et la préparation des parties prenantes sur les activités et les importants événements du projet ainsi que. Le projet utilisera les médias suivants pour la diffusion de l'information :

- ***Radios locales***
- ***Chaines de Télévision (publique et privée)***

e. Autres moyens de communications

- ✚ Le site web du projet (EHPMP, P167788) et éventuellement les réseaux sociaux (pages Facebook du projet et/ou des membres de l'équipe du projet) ;
- ✚ Le téléphone - l'utilisation du téléphone portable est toujours considérée comme la méthode préférée de communication en raison de l'accessibilité et de la rapidité. Le plus souvent, avoir une discussion directe via un téléphone peut contribuer à assurer une compréhension mutuelle entre deux parties. Il est plus rapide et plus facile par rapport à l'envoi d'un e-mail et en attente de réponses. Cette approche exige la mise en place d'une base de données avec les numéros de contacts des principaux parties prenantes clés.

3.3. Proposition de stratégie de consultation

Un large processus de consultation nécessite l'utilisation et la combinaison de différentes méthodes en tenant compte des caractéristiques du public cible. Les méthodes de consultation du projet sont présentées dans le tableau ci-dessous.

Tableau 1 : Stratégie de consultation des parties prenantes suivant le cycle du projet

Activités	Sujet de la consultation	Méthode utilisée	Dates et lieux	Groupe cibles	Responsabilité
PHASE DE PREPARATION DU PROJET					
Réunion d'échanges et de travail entre la partie nationale et le Partenaire Technique et Financier (Banque Mondiale) pour préparer les conditions préalables de décaissement	Préparation des documents du projet (PAD, document du projet, accord de financement, instruments de sauvegardes environnementales et sociales y compris le plan d'engagement environnement et social, PEPP, etc.	Rencontres avec les autorités (MEDD et son Staff) /Ateliers de travail au siège de la Banque Mondiale Discussions de focus groupes et réunions publiques de consultation	A définir par l'UCP	Les experts de la Banque Mondiale, Equipe de préparation du projet, Agences gouvernementales, ONG, société civile et secteurs privés	Equipe de la Banque mondiale, les responsables du MEDD, les responsables des Ministères concernés, UCP
Préparation du programme d'activités du projet et du plan de passation des marchés	Plan d'activités budgétisés, élaboration du plan de passation des marchés, chronogramme du suivi des activités	Réunion/Atelier	Siège de l'unité de coordination du projet ou tout autre lieu (Date à définir).	Les bénéficiaires du projet et les parties prenantes	Le Coordonnateur du projet, les spécialistes en gestion des finances publiques, en marchés publics, les responsables

					chargés du suivi-évaluation, etc.
PHASE D'EXECUTION DU PROJET					
Consultations formelles et informelles avec les parties prenantes du projet des municipalités concernées.	Information sur les risques et les impacts environnementaux et sociaux potentiels du projet et les mesures de gestions	Réunions publiques/Ateliers d'information	Lieux publics des municipalités concernées (tout le cycle d'exécution du projet).	Les responsables des collectivités locales, des structures déconcentrées des ministères concernés, les autorités coutumières et religieuses	L'équipe du projet, les spécialistes environnement et social.
	Information sur les risques de violence basée sur le genre (VBG) et d'exploitation et d'abus sexuels (EAS) au cours de la mise en œuvre du projet et les mesures de gestion.	Réunions publiques/Ateliers d'information	Lieux publics des municipalités concernées (en cas de viol, d'agression sexuelle, etc.).	Les filles et les femmes	L'équipe de projet, les spécialistes environnement et social, le consultant en genre.
Rencontres avec les bénéficiaires	Critères de choix des zones d'intervention, et les procédures à suivre pour traiter les cas litigieux.	Réunions publiques/ateliers d'information, médias publics et privés.	Sites des personnes bénéficiaires (tout au long du projet).	Les personnes affectées par le projet.	L'équipe du projet, spécialistes environnement et social, les autorités administratives, les autorités municipales, coutumières et religieuses, ONG, etc.

PHASE DE SUIVI -EVALUATION DES ACTIVITES DE PEPP					
Suivi de la mise en œuvre du PEPP	Rapports d'activités	Sorties sur le terrain, enquêtes auprès des bénéficiaires	Les sites du projet (tout au long du projet)	Les bénéficiaires et les acteurs locaux du projet	Le chargé du suivi-évaluation du projet, le coordonnateur du projet
Evaluation de mise en œuvre du PEPP	Rapports d'évaluation	Sorties sur le terrain, enquêtes auprès des ménages, méthode de randomisation	Les sites du projet (tout au long du projet)	Les bénéficiaires et les acteurs locaux du projet	Le chargé du suivi-évaluation du projet, le coordonnateur du projet, les Spécialistes Environnement et Social, les ONG et les acteurs locaux de développement.

3.4. Synthèse des consultations des parties prenantes

Les consultations avec les parties prenantes seront réalisées par un consultant national avec l'appui des cadres de l'administration municipale et publique.

3.4.1. Consultations en cours

Elles concernent les échanges avec les Maires des communes de Hann Bel-Air et de Dalifort, les Directions et services publics pour les dispositions à prendre dans le cadre de l'organisation des consultations à prévoir. Il convient de souligner également que des échanges se tiennent actuellement avec l'UCP, l'équipe de la Banque mondiale et les responsables au niveau central impliqués pour donner plus de précisions sur les activités à mener et les informations à communiquer pour éviter d'éventuelles incompréhensions sur le terrain (cf. Annexe compte rendu de la réunion avec les Maires des communes de Hann Bel-Air et de Dalifort.)

Il est prévu la tenue prochaine d'ateliers de consultation des parties prenantes. A cet effet, des lettres d'invitation seront préparées et transmises aux personnes concernées dans des délais appropriés. Les rapports de consultations seront préparés et partagés avec les parties prenantes.

La dernière version du PEPP intégrera les avis des parties prenantes recueillis lors des consultations.

3.4.2. Les prochaines étapes

Le projet mettra en œuvre un système de « Reporting » qui permettra la collecte d'informations sur le projet, l'analyse et la diffusion aux personnes intéressées/touchées. Les rapports mensuels sur le projet montreront comment les questions environnementales et sociales sont abordées et quels sont les défis clés du projet. La mise en œuvre du PEPP sera également contrôlée par des rapports mensuels préparés par l'UCP. Cela inclura la surveillance et le reporting du mécanisme de gestion des plaintes (MGP). L'UCP établira et partagera avec les parties prenantes un rapport annuel présentant le niveau de mise en œuvre des différents indicateurs.

L'UCP invitera également un nombre limité et représentatif de parties prenantes à une réunion annuelle pour évaluer les progrès du projet, évaluer les défis et planifier les actions futures.

Ressources et responsabilités pour l'exécution des activités d'engagement des parties prenantes

1. Ressources

L'engagement des parties prenantes exige des ressources adéquates. Un total estimatif de 85,000 dollars par an sera requis pour la mise en œuvre des activités du PEPP (voir le tableau ci-dessous). L'estimation budgétaire ci-dessous est sujet à révision et ajustement sur la base des besoins de consultation identifiés tout au long de la mise en œuvre du projet.

Tableau 2 – Budget annuel estimatif de PEPP

Nr.	Activités clés	Quantité.	unité	Budget unitaire (USD)	Budget total (USD)
1	Publicité dans le journal/radio/TV	10	Publicités	500	5, 000
2	Réunions de consultation (lieux, impression, cahiers, rafraîchissements, etc.)	10	Réunions	5 000	50, 000
3	transport	Forfait			10,000
4	Divers et Imprévus	Forfait			20, 000
5	Total				85,000

2. Fonctions et responsabilités de gestion

L'UCP sera tenue pour responsable de la mise en œuvre de l'engagement des parties prenantes du projet. Au sein de l'équipe de l'UCP, un spécialiste des sauvegardes environnementales ou sociales et au besoin un spécialiste en communication seront chargés de coordonner les activités du PEPP. Les questions/commentaires sur le projet doivent être adressés aux contacts indiqués ci-dessous. Ce tableau ci-après sera mis à jour dès que les noms et les contacts des responsables seront désignés.

Tableau 3 – équipe de gestion du PEPP

Nr.	Contact	Adresse physique	Contacts:
1	Coordonnateur du projet /unité de mise en œuvre du projet –	A compléter par l'UCP	A compléter par l'UCP
2	Un Spécialiste en sauvegarde environnementale		cel: email:
3	Un spécialiste en sauvegarde sociale		cel: email:
4	Un spécialiste en communication		cel: email:

5	Specialiste en suivi evaluation		cell: email:
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MECANISME DE GESTION DES GRIEFS DANS LE CADRE DU PROJET EHPMP

1. Concepts de base

Grief ou plainte : un grief ou une plainte est défini comme une expression d'insatisfaction par rapport au niveau ou à la qualité d'une action ou de l'inaction, exprimant directement ou indirectement un désagrément à un individu ou un groupe de personne par rapport à la mise en œuvre d'un projet. Les griefs sont directement liés aux activités du projet. Les bénéficiaires et les autres parties prenantes, principalement les personnes affectées, ont le droit de se plaindre si les normes et/ou les accords convenus ne sont pas respectés. Toute plainte reçue exige une réponse et la structure qui la reçoit a le devoir de répondre au/aux plaignants dans un délai connu. Les outils de collecte et une typologie de plaintes sont définis et gérés par la structure responsable.

Le mécanisme de gestion des griefs est un système qui permet de recevoir, instruire, traiter de manière équitable et efficace et résoudre les griefs résultant de la mise en œuvre des activités du projet. C'est un instrument qui accorde aux parties prenantes le droit de dénoncer les abus, les insuffisances, les violations de droits ou des accords passés et de demander la réparation ou la cessation du fait préjudiciable.

La rétroactivité ou le retour opportun de l'information est l'expression d'une préoccupation, positive ou négative qui apporte des indications utiles sur les perceptions des parties prenantes par rapport à la mise en œuvre des activités d'un projet. Elle traduit les demandes ou exigences de clarifications, de vérifications ou manifestations préoccupations des parties prenantes par rapport à l'exécution des activités les concernant. C'est un outil de participation des parties prenantes qui permet de mesurer le niveau de conformité de l'exécution des mesures convenues.

2. Procédures de gestion et de réglementation des griefs du projet EHPMP

Le projet comporte deux mécanismes de gestion des griefs : l'un pour les problèmes liés à la main-d'œuvre, qui est défini dans le plan de gestion des relations de travail du projet, et l'autre pour les autres plaintes, qui est défini dans le présent document.

2.1. Parties prenantes

Tout individu ou groupe de personnes se sentant lésé ou ayant des informations sur les dysfonctionnements des activités du projet peut déposer une plainte. Les parties prenantes au sens du présent mécanisme de gestion des griefs seraient des personnes physiques ou morales directement ou indirectement affectées par les activités du projet, ou celles ayant des intérêts dans le contexte du projet ou ayant la capacité d'en influencer les résultats. Ainsi les populations locales, les bénéficiaires, les autorités locales ou traditionnelles, les autorités communales ou les autres services de l'Etat, la société civile, les entreprises du secteur privé, toutes autres structures dans les zones de mise en œuvre des activités du projet, sont parties prenantes au présent MGP.

2.2. Types de plaintes

Les types de plaintes éligibles aux dispositions du présent mécanisme sont entre autres les cas de corruption, de fraude, d'exploitation ou d'abus sexuel, de discrimination liée au genre, à la religion, à l'ethnie, à la politique et de faute grave ou de négligence professionnelle.

Le grief dans le contexte du projet se rapporte directement aux engagements pris (critères d'éligibilité des bénéficiaires, responsabilités des parties prenantes, activités du projet, zones d'intervention, les codes de conduite ou lignes directrices, etc.).

2.3. Actions envisagées

Sans être exhaustif, les actions suivantes sont prévues :

- Informations/sensibilisation et actions de communication sur les dispositions du mécanisme ;
- Mise en place de boîtes où les plaintes ou réclamations seraient déposées de façon formelle ou anonyme ;
- Mise en place d'une procédure d'appel pour recueillir les plaintes et réclamations des bénéficiaires (par exemple les bénéficiaires qui n'ont pas été sélectionnés, alors qu'ils sont éligibles au regard des critères de sélection, peuvent déposer un recours de contestation) ;
- Une plage horaire par semaine au niveau des communes et de l'UCP sera dédiée aux bénéficiaires pour la collecte et la gestion des plaintes et réclamations ;
- Un numéro de téléphone sera disponible où les bénéficiaires peuvent appeler pour déposer une plainte (l'anonymat sera respecté au sujet du projet) ;
- Un temps sera réservé à la fin de chaque assemblée communautaire ou réunion du conseil municipal pour permettre aux bénéficiaires de faire part de leurs inquiétudes et plaintes au personnel local, soit publiquement où en privé ;
- Un comité de gestion des plaintes sera mis en place dans chaque municipalité pour recueillir les plaintes et réclamations. S'agissant des procédures de règlement, le comité sera élargi, au besoin, de membres des structures déconcentrées des ministères concernés par le projet (MEDD, MGT), des autorités locales et des responsables coutumiers et religieux, des représentants des bénéficiaires du projet, etc.
- Les plaintes de nature sensible (abus sexuel, fraude, corruption) seront traitées de façon confidentielle et sans représailles de la part du comité des plaintes (au besoin en impliquant d'autres acteurs), afin de garantir aux plaignants une protection maximale.

2.4. Procédures de gestion et de règlement des plaintes et réclamations

Dans le cadre de la gestion à l'amiable, les sept étapes suivantes sont applicables :

- ❖ **Phase 1 : réception des plaintes** : Les plaintes sont reçues suivant les boîtes à plaintes, téléphone, registre, la saisie par l'intermédiaire d'une personne ressource, durant les assemblées communautaires, etc. Toutes les plaintes et réclamations reçues seront enregistrées au niveau des municipalités ou de l'UCP. Quelle que soit la façon dont les griefs sont communiqués, l'équipe du projet doit s'assurer que toutes les plaintes sont bien consignées et enregistrées dans une base de données pour le suivi, et le reporting.
- ❖ **Phase 2 : l'analyse des plaintes** se fait selon le « type » de plainte, c'est-à-dire une plainte de nature sensible ou non-sensible, une plainte grave ou moins grave. Le délai pour l'analyse d'une plainte serait d'une semaine.
- ❖ **Phase 3 : l'examen des plaintes et les enquêtes de vérification** consiste à déterminer la validité des plaintes traitées ; établir clairement quel engagement ou promesse n'a pas été respecté ; et décider des mesures à prendre pour y donner suite ; au besoin des investigations sont faites pour trouver des réponses appropriées dans un délai de deux semaines.
En général, les trois types principaux de réponse aux plaintes peuvent être notés :
 - a) Action directe pour la résolution de la plainte ;
 - b) Poursuite de l'évaluation et engagement avec le plaignant et d'autres parties prenantes pour déterminer conjointement la meilleure façon de résoudre la plainte ;
 - c) Détermination selon laquelle la plainte n'est pas admissible au MGP, soit parce qu'elle ne répond pas aux critères d'admissibilité de base, soit parce qu'un autre mécanisme (au sein de l'organisation ou à l'extérieur, y compris le processus judiciaire) est la voie la plus appropriée à suivre pour la plainte.
- ❖ **Phase 4 : les réponses et les prises de mesures** visent à corriger, modifier ou changer pour améliorer la situation et résoudre le problème. Une plainte reçue exige une réponse rapide de la part du comité ou de l'UCP dans un délai d'une semaine maximum. Il est fondamental de communiquer clairement à la personne plaignante les constats issus des processus d'examen et d'enquête et de la tenir dûment informée des mesures qui seront prises à la suite de ce qui a été décidé ;
- ❖ **Phase 5 : la procédure d'appel (deux semaines)**. Si la réponse n'est pas acceptée et que les parties concernées ne peuvent parvenir à une solution, la personne plaignante peut décider de faire appel de la réponse dans un délai de deux semaines à partir de la réception de la notification de la réponse du comité ou de l'UCP. La procédure d'appel permet de réexaminer le processus de traitement effectué et de déterminer au besoin des éléments supplémentaires à la décision sur la base des constats issus de ce réexamen. La résolution par comité est à l'amiable. Le plaignant peut également en fonction de la nature de sa requête faire un recours juridictionnel ;
- ❖ **Phase 6 : la résolution** intervient lorsque toutes les parties concernées de la plainte parviennent à un accord et, plus important encore, la personne plaignante est satisfaite du fait que la plainte a été traitée de façon juste et appropriée et que les mesures prises seront

respectées. La notification de la résolution doit se faire au maximum deux semaines après le traitement consensuel.

- ❖ **Phase7 : le Suivi et l'enregistrement des plaintes** permet d'assurer la surveillance et la gestion des plaintes reçues. Le suivi des réponses/décisions peut aider à alimenter le processus d'évaluation et à apporter des ajustements, au besoin, au mécanisme de gestion des griefs. La dernière étape consiste à clore le grief. La documentation écrite du plaignant indiquant la satisfaction de la réponse doit être obtenue.

Toutefois, le recours en justice, consistant à régler le différend devant un tribunal compétent, n'est pas exclu. Il interviendra que lorsque tous les recours de règlement à l'amiable seront épuisés. Le tribunal de grandes instances de la région de Dakar, zone d'intervention du projet, pourrait être saisi.

2.5. Rôles des acteurs et les délais de traitement

Les comités au niveau des municipalités et de l'UCP sont responsables de l'enregistrement et le traitement (analyse, investigation et résolution) des plaintes. Au besoin d'autres acteurs pourraient être impliqués notamment pour les investigations et la résolution des plaintes sensibles.

Le délai de traitement et de la résolution d'une plainte sera fonction de la nature et de la complexité des investigations. Pour les plaintes ne nécessitant pas des investigations le comité et/ou l'UCP pourrait donner une réponse dans un délai inférieur ou égal à deux semaines à partir de la réception de la plainte. Pour les plaintes sensibles (corruption, fraude, cas de violences basées sur le genre, etc.), le traitement serait fonction de la complexité des investigations nécessaires et le délai pourrait aller d'un mois ou plus.

4. Ghana SEP

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LIST OF ABBREVIATIONS AND ACRONYMS

ASGM	Artisanal and small-scale gold mining
CBO	Community Based Organization
CE	Citizen Engagement
CSIR	Council for Scientific and Industrial Research
CSO	Civil Society Organisation
E&S	Environmental and Social
EHPMP	Environmental Health and Pollution Management Program
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FBO	Faith Based Organization
FIP	Forest Investment Program
FC	Forestry Commission
GBV	Gender Based Violence
GEF	Global Environment Facility
GHS	Ghana Health Service
GRM	Grievance Redress Mechanism
GSA	Ghana Standard Authority
MC	Minerals Commission
MESTI	Ministry of Environment, Science, Technology and Innovation
MLNR	Ministry of Lands and Natural Resources
MMDA	Metropolitan Municipal District Assembly
MLGRD	Ministry of Local Government and Rural Development
MOTI	The Ministry of Trade & Industry
NGO	Non-Governmental Organization
PAPs	Project Affected Persons
PDO	Proposed Development Objective
PIM	Project Implementation Manual
PCU	Project Implementation Units
POPs	Persistent Organic Pollutants
SEP	Stakeholder Engagement Plan
STEPRI	Science and Technology Policy Research Institute
UMAT	University of Mines and Technology
UPOPs	Unintentional Persistent Organic Pollutants
WB	World Bank

EXECUTIVE SUMMARY

The goal of this Stakeholder Engagement Plan (SEP) is to define a suitable programme and plan for stakeholder engagement in the design and in the implementation and outcomes of the Ghana Environmental Health and Pollution Management Program (EHPMP). The SEP is designed to establish an effective platform for productive interaction with potentially affected parties and persons with interest. Effective stakeholder engagement is a necessary aspect of any good project and the EHPMP SEP will help solicit feedback to inform project design and implementation while simultaneously managing expectations of beneficiaries and interested parties about project outcomes.

The proposed Environmental Health and Pollution Management Program which is supported by Global Environment Facility (GEF) aims to reduce environmental health risks from Persistent Organic Pollutants (POPs) releases in artisanal and small-scale gold mining (ASGM) and electronic waste (e-waste) in Ghana through strengthened institutional partnership and capacity building in pollution management. The program which brings under one common thread of environmental health, concerns related to urbanization, industrial growth, ASGM, and e-waste, is designed to focus on specific commitments under the Stockholm and Minamata conventions in line with country-driven priorities, and to build institutional and technical capacity into the country projects through offering a menu of options to allow countries to tailor their needs based on their identified priorities, capacity and country context. The lead implementing agency is the Environmental Protection Agency (EPA) under the Ministry of Environment Science, Technology, and Innovation (MESTI).

The SEP outlines previews stakeholder engagement activities categorizing various groups, their interests and topics of consultations. The identification and analysis of stakeholder groups include government agencies, development partners, Civil Society and Non-Governmental Organisations, Academia, and at the school level, teachers and students. These stakeholder groups also cover affected and other interested parties, key characteristics of vulnerable groups and their specific needs. A stakeholder engagement programme also sets out details of the purpose, timing and methods of stakeholder engagement and the EHPMP strategy for information disclosure which incorporates the view of vulnerable groups.

A summary of key institutions and focal persons has been included in the SEP to allow for easy identification of roles and responsibilities. A Grievance Redress Mechanism (GRM) will be incorporated in an already existing GRM within EPA. Follow up on grievances and actions taken will form part of the overall monitoring of the project implementation unit.

1.0 BACKGROUND AND INTRODUCTION

1.1 Purpose

Effective stakeholder engagement is an important part of project management and it is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project’s environmental and social risks and impacts. Early engagement and ongoing dialogue with stakeholders also allow for earlier identification of potential stakeholder issues and risks as or before they arise and informs more appropriate project design. There is clear evidence that the greater the level of stakeholder engagement, the more thorough the identification of potential impacts. This all contributes to a stronger more sustainable relationship between stakeholders and the project proponent. This is particularly true for the groups and individuals most directly affected by planned projects. Establishing trust between parties through a participatory process that allows for open and constructive engagement is acknowledged as key for satisfactory resolution of grievances and issues which, if left unmanaged, can present risks to a development in terms of unplanned delays and costs.

1.2 Objectives

The overarching goal of this Stakeholder Engagement Plan (SEP) is to define a suitable programme and plan for stakeholder engagement that will apply across the Project’s life and that will support the Environmental Health and Pollution Management Program in achieving its objectives. This SEP is designed to establish an effective platform for productive interaction with potentially affected parties and others with interest in the implementation and outcomes of the project.

The specific objectives for the plan are summarised below:

Objective	Rationale
Identify all relevant stakeholders for this Project	Involving as many stakeholders as possible will facilitate inclusive communication and capture a wide range of issues and concerns. Identifying the major stakeholders affected by the project either directly or indirectly (including vulnerable groups) as well as those with other interests that could influence decisions about the project.
Stakeholder Engagement Method	Outlines the engagement approach to be undertaken and planned, and articulates a range of strategies for timely, relevant and accessible stakeholder engagement throughout the project life cycle.
Distribute accurate project information in an open and transparent manner	Ensuring that stakeholders, particularly those directly affected by the proposed development, have information at their disposal with which to make informed comments and enable them to plan for the future. This reduces levels of uncertainty and anxiety. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
Record and address public concerns, issues and suggestions	Documenting stakeholder issues allows project decisions to be traced and motivated and lets stakeholders see where their input has been

	incorporated into planning and design. This approach addresses potential concerns that stakeholder engagement may be a token gesture by the developer that meets legislative requirements but that it is not taken seriously in the project planning.
Manage stakeholders' expectations	Expectations, both positive and negative, are often out of proportion to the realities of a project. Ensuring that expectations are kept at realistic levels limits the disappointment and frustration of directly affected parties at later stages of project implementation. Frustration and unfulfilled expectations are key triggers of conflict and require mitigation and management that might otherwise be avoided.
Fulfil national, World Bank and international requirements consultation	Ensuring regulatory compliance can avoid potential project delays based on procedural issues rather than substantive ones.

Against this background, the Project 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 the project regarding the implementation of the project;
- 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 Project Description

Most Sub-Saharan African countries experience multiple environmental-health challenges related to inadequate capacity to effectively monitor the use of chemicals, and management of chemical waste. Institutions lack effective regulations and enforcement, producers lack access to clean production and waste management technologies, and the public has no information on environmental-health risks. Nearly 35% of the deaths in sub-Saharan Africa are linked to environmental hazards from toxic chemicals. Diseases caused by pollution were estimated to have caused 9 million premature deaths in 2015, which

was 16% of all deaths worldwide. Among the most critical pollution management issues in Sub-Saharan Africa are those related to mercury use in Artisanal and Small-scale Gold Mining (ASGM) sector, e-waste management and the release of UPOPs from open burning of wastes. Ghana faces challenges related to inadequate capacity to effectively monitor the use of chemicals, lack of capacity for regulation and weak enforcement, lack of access to cleaner production systems, technologies for waste management and availability of information.

The proposed Environmental Health and Pollution Management Program in Ghana which is supported by GEF aims to reduce environmental health risks from Persistent Organic Pollutants (POPs) releases in artisanal and small-scale gold mining (ASGM) and electronic waste (e-waste) in Ghana through strengthened institutional partnership and capacity building in pollution management. The program which brings under one common thread of environmental health, concerns related to urbanization, industrial growth, ASGM, and e-waste, is designed to focus on specific commitments under the Stockholm and Minamata conventions in line with country-driven priorities, and to build institutional and technical capacity into the country projects through offering a menu of options to allow countries to tailor their needs based on their identified priorities, capacity and country context. The Project has four components as described below:

- ***Component 1 - Institutional strengthening, capacity building and knowledge sharing:*** The project will strengthen the knowledge and capacity base of public institutions and private stakeholders to address environmental health risks associated with mercury use in ASGM sector and POPs/UPOPs releases from e-waste. It will enhance the capacity of institutions and other mercury stakeholders in Ghana to address environmental health risks associated with mercury use in ASGM sector and support the successful implementation of the Minamata Convention. It will also enhance the capacity of institutions and other stakeholders in Ghana to ensure environmentally-sound disposal and recycling of e-waste in Ghana.
- ***Component 2 - Policy dialogue and regulatory enhancements:*** The project seeks to strengthen regulatory frameworks and facilitate their implementation to better address environmental health risks associated with mercury use in ASGM sector and POPs/UPOPs releases from e-waste. The project will support assessment and analysis of national institutional, policy, and legislative gaps in mercury management in Ghana to meet the requirements of the Minamata Convention. It will then support the development of a legal framework that incorporates the obligations under the Minamata Convention as well as an administrative structure for its full and effective implementation. The project will also support the Government's efforts in strengthening the current environmental policies and regulations related to health and environmental risks associated with e-waste management and hazardous waste.
- ***Component 3 - Demonstrating the application of technological tools and economic approaches:*** The project will support the establishment of clean mining demonstration centers. It will support specific community-focused cleaner technology demonstration activities in contaminated areas, selected and designed based on environmental health risks and cost effectiveness of interventions. The investments in specific technologies will be at the national level to meet the specific needs of the participating countries. The Project will be technology neutral to ensure the most appropriate and cost-effective

technology choices are made for each country. The Project will focus on demonstrating best practice ASM processes through the establishment of demonstration centers for training and promotion of alternative mercury free technologies in the ASGM sector. The project will support the EPA in designing pilot projects related to Agbobloshie and other e-waste contaminated sites such as Kumasi, Ashaiman, Tamale, or Koforidua, on the implementation of integrated and environmentally-sound management solutions to improve the collection, transportation, and safe disposal/recycling of e-waste, following Article 6 of the Stockholm Convention on wastes, and relevant guidance.

- **Component 4: Project management:** This component will cover the cost for project management, implementation and supervision of project activities, administration of procurement and financial management, monitoring and evaluation, and monitoring of safeguards compliance. The component will cover the cost of the Project Implementation Units (PCU) within the EPA.

The Project will work closely with the proposed World bank funded Ghana Artisanal and Small-Scale Mining Formalization Project (P168002), which seeks to address the challenges associated with illegal mining by supporting ASM formalization, strengthening the government's capacity to monitor ASM operations, and support environmentally and socially sustainable ASM practices, and the Forest Investment Program (FIP) - Enhancing Natural Forest and Agroforest Landscapes Project (P163745).

1.4 Regulations Context

1.4.1 National Legislation

Constitution

The 1992 Constitution of Ghana acknowledges the right to information under Article 21(1) (f) as a fundamental human right of all citizens. This right will be properly enjoyed where the public is efficiently engaged in the processes and procedures of public institutions.

Environmental and Social Impact Assessment (ESIA)

Stakeholder engagement in Ghana is connected to the preparation of an Environmental and Social Impact Assessment (ESIA). The Environmental Assessment Regulations 1999, (LI 1652) provides the regulatory framework for the administration of Environmental Assessment (EA) in Ghana. The regulation provides for the participation of stakeholders at all levels of the Environmental Impact Assessment (EIA) process in order to ensure that their concerns and inputs are considered as part of the design, planning, project implementation and decommissioning. Section 16 (1) (3) makes provision for the general public to make comments and provide suggestions on any project; Section 17 (1) makes provisions for public hearing; and Section 27 (1) provides the platform for complaints by aggrieved persons. Further, the strategic goal 4 of the National Environmental Policy which focuses on participation and coordination in environmental governance charges the lead institutions in environmental governance to ensure active participation in all environmental matters.

1.4.2 World Bank Standards

Environmental and Social Standards

The World Bank's Environment and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure, recognizes the importance of open and transparent engagement between the project and stakeholders as an essential element of good international practice. It indicates that, effective stakeholder

engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

1.5 Brief Summary of Previous Engagement Activities

As part of the Minamata Initial Assessment (MIA), the Ministry of Environment, Science, Technology and Innovation and the Environmental Protection Agency commissioned a team to engage with different stakeholders. Relevant stakeholders were consulted and participated in the inception meeting of the assessment. The list of stakeholders consulted is provided in the Annex 2. The objective of the MIA is to enable the Government of Ghana establish a sound foundation to undertake future work towards the implementation of the Convention. In November 2019, the Ghana Health Service also organized a stakeholder workshop on assessment of public health challenges in ASGM communities. Evidence of workshop is provided in the Annex 3

EPA also supported the Ghana e-Waste Country Assessment and engaged different stakeholders in the process. Evidence of stakeholder engagement in the assessment process is provided in the Annex 4.

As such, these stakeholder engagement and inputs have been incorporated in the project identification and design.

2.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders include persons or groups directly or indirectly affected by a project, as well as those who may have interest in a project and/or the ability to influence its outcome, either positively or negatively. In order to develop an effective SEP, it is necessary to first identify who the stakeholders are, their groupings and sub-groupings.

Table 1 below identifies the key stakeholder groups that may have interest in a project and/or the ability to influence its outcome, either positively or negatively. This list of stakeholders is likely to expand/change in composition as the Project moves and since the SEP is a “living document” it will be updated regularly throughout the Project life as appropriate.

Table 1: Stakeholder Groups with interest in Mercury and E-waste Management in Ghana

Government Authorities	Non-Governmental Organizations (Civil Society Organizations)
<ul style="list-style-type: none"> • Ministry of Environment, Science, Technology and Innovation • Ministry of Lands and Natural Resources • Ministry of Health • Ministry of Employment and Labour Relations • Ministry of Finance • Ministry of Information • Ministry of Justice and Attorney General's Department • Ministry of Local Government and Rural Development 	<ul style="list-style-type: none"> • Environmental Non-Governmental Organisations (NGOs). Such as Friends of The Nation and Ecological Restorations • Institute of Environmental Compliance and Sustainable Development • Ghana National Association of Small-Scale Miners • Greater Accra Scrap Dealers Association
	<p>Development Partners and International Organizations</p> <ul style="list-style-type: none"> • Giz • KfW • European Union

<ul style="list-style-type: none"> • Ministry of Foreign Affairs and Regional Integration • The Ministry of Trade & Industry • Environmental Protection Agency • Minerals Commission • Ghana Health Service • Ghana Revenue Authority- Customs Division • Information Services Department • Ghana Atomic Energy Commission • Council for Scientific and Industrial Research • Forestry Commission • Ghana Standard Authority • Metropolitan, Municipal and District Assemblies 	<ul style="list-style-type: none"> • US Embassy, Ghana • Secretariat of Economic Affairs of Switzerland (SECO) and the Swiss Federal Laboratories for Material Sciences and Technology • United Nations Development Programme • United Nations Industrial Development Organization
	Affected Communities <ul style="list-style-type: none"> • Inhabitants of towns and villages affected by artisanal small-scale gold mining • Users of land affected by artisanal small-scale gold mining • Traditional leaders and Representatives of affected communities
Commercial Interest	Universities and Research Organization
<ul style="list-style-type: none"> • Small Scale/Informal Importers and Distributors of e-waste • Importers and traders of mercury • Scrap dealers • Artisanal miners • Other mining businesses • Ghana Electronics Servicing Technicians Association • smelters operating companies (eg. Gravita Ghana Ltd, Goldline (FZE) Ghana Ltd., Success Africa Ghana Ltd., Non-Ferrous Metals Ghana Ltd.) 	University of Mines and Technology

Table 2 below describes the roles and influence of different ministries, Department and agencies un the project.

Table 2: Roles and Responsibilities of Government Ministries, Departments and Agencies

Partner Ministries, Departments and Agencies (MDAs) and other for Implementation	Role and Influence
Ministry of Environment Science Technology & Innovation (MESTI)	MESTI provides coordination and monitoring role in the implementation of environmental programs. Generally, the ministry is mandated to have oversight responsibility to provide leadership and guidance for Environment, Science, Technology and Innovation within the broad sector of the economy through sound policy formulation and implementation. It ensures the establishment of the regulatory framework and setting of standards to govern the activities of science and technology and the management of the environment for sustainable development. MESTI also has the responsibility to analyze and coordinate all planned programs in the environment, science, technology and innovation sector of the economy for purposes of achieving a single integrated management system.
Ministry of Lands and Natural Resources (MLNR)	MLNR has overall responsibility for the land and natural resources sector planning and policy direction and for monitoring sector programs towards the attainment of the national goals. The ministry is thus

	responsible for the management of Ghana's land, forests, wildlife and mineral resources.
Ministry of Local Government and Rural Development (MLGRD)	MLGRD will play a role in the engagement with Metropolitan and Municipal District Assemblies (MMDAs) in the selection of remediation sites and e-waste pilot areas.
The Ministry of Trade & Industry (MOTI)	MOTI will support activities as related to the trade of mercury and e-waste. The Ministry is the lead policy advisor to government on trade, industrial and private sector development with responsibility for the formulation and implementation of policies for the promotion, growth and development of domestic and international trade and industry. The Ministry is also the advocate for the private sector within government and is the principal agency responsible for monitoring and implementing the Government's private sector development programmes and activities.
Environmental Protection Agency (EPA)	EPA will be the lead Implementing Agency of the Project responsible for overall management, coordination and project reporting. EPA was established under the Environmental Protection Agency Act (Act 490 of 1994) as the leading public body responsible for the protection and improvement of the environment in Ghana. It is responsible for enforcing environmental policy and legislation, prescribing standards and guidelines, inspecting and regulating businesses and responding to emergency incidents.
Minerals Commission (MC)	MC is an implementing agency for the proposed Artisanal and Small-Scale Mining Formalization (P168002) and will ensure effective coordination between EHPMP and the ASM formalization project. The Commission was established under Article 269 of the 1992 Constitution and the Minerals Commission Act 1993, Act 450. It is the main promotional and regulatory body for the minerals sector in Ghana and responsible for "the regulation and management of the utilization of the mineral resources of Ghana and the coordination and implementation of policies relating to mining". It ensures compliance with Ghana's Mining and Mineral Laws and Regulation through effective monitoring.
Forestry Commission (FC)	FC will provide technical support in the selection of pilot sites for remediation. FC is the implementation arm of MLNR responsible for regulation, control and management of forest resources.
Ghana Health Service (GHS)	GHS will support activities relating to awareness creation on the health effect of mercury and the development of health sector actions plan.
Ghana Standard Authority (GSA)	GSB is the agency responsible for the maintenance of acceptable standards for product and services and sound management practices in industries and public institutions in Ghana. The authority is responsible for the development, maintenance and dissemination of Standards for electrotechnical products.
Metropolitan, Municipal and District Assemblies (MMDAs)	MMDAs are responsible for administering the Local Governance Act of 2016, Act 936. The MMDAs have the ultimate role to seek the necessary approvals and implement the district's development plan. MMDAs have the responsibility for ensuring proper waste management.
University of Mines and Technology (UMAT)	UMATS is also considered as an implementing agency for the proposed ASM formalization project that will lead activities on the development of a mining demonstration center. The demonstration center will serve for the purpose of learning by actors of the mining sector and will benefit students of geoscience as well as ASMs and the general public.

	The centre will constitute one of the interventions aimed at sustainable and responsible small-scale mining in Ghana.
Council for Scientific and Industrial Research (CSIR)-Science and Technology Policy Research Institute (STEPRI)	CSIR-STEPRI conducts research to provide knowledge-based information to contribute to the formulation and implementation of policies and programmes for socio-economic development based on Science, Technology and Innovation (STI).

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 projects. Within the broader framework of the projects and activities to be undertaken, the following categories of stakeholders can be identified:

- (a) Stakeholders who will be directly and/or indirectly affected by the project
- (b) Stakeholders that have interest in projects and interventions under the project and have the potential to influence the project’s outcomes
- (c) Disadvantaged/ vulnerable individuals or groups.

In summary, Table 3, below shows how project stakeholders are categorized base on the level of interest (high, medium and low) and the level they are affected (high, medium and low), by the Project.

Table 3: Stakeholder Analysis

Level of Interest	High	<ul style="list-style-type: none"> • The Ministry of Trade & Industry • Ministry of Information • Giz • KfW • European Union • US Embassy, Ghana • Secretariat of Economic Affairs of Switzerland (SECO) and the Swiss Federal Laboratories for Material Sciences and Technology • United Nations Development Programme • United Nations Industrial Development Organization • 	<ul style="list-style-type: none"> • Ministry of Health • Ministry of Employment and Labour Relations • Information Services Department • Environmental Non-Governmental Organisations (NGOs). 	<ul style="list-style-type: none"> • Ministry of Environment Science Technology & Innovation (MESTI) • Ministry of Lands and Natural Resources (MLNR) • Environmental Protection Agency (EPA) • Minerals Commission • Ministry of Local Government and Rural Development • Ghana Health Service • Metropolitan, Municipal and District Assemblies • Importers and traders of mercury • Scrap dealers • Artisanal miners • Small Scale/Informal Importers and Distributers of e-waste • Ghana National Association of Small-Scale Miners • Scrap Dealers Association • Inhabitants of towns and villages affected by artisanal small-scale gold mining • Users of land affected by artisanal small-scale gold mining • Traditional leaders and Representatives of affected communities • University of Mines and Technology • Ghana Electronics Servicing Technicians Association • • Vulnerable Groups • Persons with Disabilities • Women • Youth with low-income status
	Medium	<ul style="list-style-type: none"> • Ghana Revenue Authority- Customs Division • Ghana Atomic Energy Commission • Council for Scientific and Industrial Research 	<ul style="list-style-type: none"> • Ministry of Finance • Ministry of Foreign Affairs and Regional Integration • Ministry of Justice and Attorney General's Department 	<ul style="list-style-type: none"> • Forestry Commission
	Low	<ul style="list-style-type: none"> • Ghana Standard Authority 		
		Low	Medium	High
		Level Affected		

Table 4 below also identifies and assesses the needs of some disadvantaged or vulnerable individuals or groups to help determine suitable engagement strategies.

Table 4: Characterization of Vulnerable Groups

Stakeholder group	Key Characteristics	Language needs	Preferred notification	Specific needs
Community members with disabilities	Hearing impairment (Hearing loss) Visual impairment (Low vision or blindness) Physical impairment (Mobility disabilities)	Braille, audio, sign language		Written information
Youth with special needs	Learning disabilities, such as Attention-Deficit Disorder, Hyperactivity Disorder, dyslexia, or dyscalculia epilepsy	Additional person support	Through care givers	Special needs textbooks and materials Limited assistive devices may be required
Women	Consultation times will have to align with the needs of women. Women may have limitations about time of day or location for public consultation; they may need child care for meetings or other additional support and resources to enable them to participate in consultations.	Local language as appropriate	Verbal, community announcement, focused group meetings etc	Gender sensitive Teaching and Learning Materials Meetings in close by locations within the communities

3.0 STAKEHOLDER ENGAGEMENT PROGRAM

3.1 Purpose and Timing of Stakeholder Engagement Program

This Stakeholder Engagement Plan (SEP) is designed to establish an effective platform for productive interaction with the potentially affected parties and others with interest in the implementation outcome of the Environmental Health and Pollution Management Program. Meaningful stakeholder engagement throughout the project cycle will:

- Solicit feedback to inform project design, implementation, monitoring and evaluation
- Clarify project objectives, scope and manage expectations
- Assess and mitigate project environmental and social risks
- Enhance project outcomes and benefits
- Build constituencies and collaboration
- Disseminate project information/ materials
- Address project grievances

Adequate stakeholder consultations will require effective timing and advanced planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, the Environmental Health and Pollution Management Program will adopt different methods and techniques based on an assessment of stakeholder needs. Methods for engagement are listed in Table 5 below.

Table 5: Environmental Health and Pollution Management Program Stakeholder Engagement Methods

Engagement Technique	Description and use	Target audience
Websites	The Project PAD and PIM, as well as the ESMF and SEP will be published on official websites of partnering and implementing Ministries and Agencies and the World Bank	All stakeholders
Media announcements	Advance announcements of commencement of major project activities, project Grievance Redress Mechanism, and other outreach needs of the project	Project-affected stakeholders and communities
Information Centre and Information Boards	Advance announcement of commencement and progress for major project activities.	Project-affected communities
Community durbars/ public meetings	These interactive platforms will be used to convey general information on the Project, detailed discussions on sub-project activity that is planned by the project, project environmental and social risks and mitigation measures and to provide regular updates on implementation progress to local, regional and national stakeholders.	Project-affected communities

Engagement Technique	Description and use	Target audience
Correspondence by phone/ email/ written letters	Distribute project information to government officials, organizations, agencies and companies and invite stakeholders to meetings	Government officials, NGOs, CSOs, CBOs, ASM Associations, Development Partners
Printed media advertisement	This will be used to disseminate and disclose project documents intended for general readers and audience (e.g. ESMF, ESCP) Advertise project procurements, as applicable	General public
Distribution of printed public materials: Project information leaflets, brochures, fact sheets	This will be used to convey general information on the Project and to provide regular updates on its progress to local, regional and national stakeholders.	General public
Internet/ Digital Media	Use of the official websites of partnering and implementing Ministries and Agencies to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public	Project stakeholders and other interested parties that have access to the internet resources.
One-on-one interviews	This will be used to solicit views and opinions on project impacts and solutions.	Vulnerable individuals, CSOs, NGOs/ ASM Associations, DPs etc.
Dedicated hotline and short code	A designated and manned telephone line and short code will be set up that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the Project.	Project affected persons, and any other stakeholders and interested parties
Workshops	This channel will be used to: (i) Present project information to a group of stakeholders; (ii) Allow the group of stakeholders to provide their views and opinions; (iii) Use participatory exercises to facilitate group discussions, brainstorm issues, analyze	Government, NGOs, CSOs, DPs, Sector Associations

Engagement Technique	Description and use	Target audience
	information, and develop recommendations and strategies; and (iv) Recording of responses.	
Focus group meetings	This will be used to facilitate discussion on specific issues such as GBV, disability inclusion, etc. that merit collective examination with various groups of stakeholders using Focus Group Meetings.	Vulnerable groups
Surveys / Independent evaluations	Surveys will be used to gather beneficiary opinions and views about project interventions. CSOs could also be engaged to support citizen feedback surveys for the project.	Project beneficiaries

3.2 Proposed Strategy for Information Disclosure

Stakeholder engagement on the Environmental Health and Pollution Management Program will follow the standard project management cycle, which are: (i) Preparation and Design Phase; (ii) Implementation Phase; (iii) Monitoring Phase; and (iv) Completion and Evaluation Phase. The strategy for information disclosure is presented in Table 6 below.

Table 6: Environmental Health and Pollution Management Program Strategy for Information Disclosure

Project stage	List of information to be disclosed	Method proposed	Target Stakeholders	Topic of consultation	Responsibility
Preparation or design phase	Project Appraisal Document (PAD)	Official websites	International, National, Regional and district stakeholders: Government ministries, agencies and departments, research organisations, NGOs, CSOs, Development partners,	Project design, benefits and impact	EPA
	ESMF, SEP	Official websites	National, Regional and district stakeholders	Environmental and Social Management, Procurement, stakeholder engagement	EPA
		Regional and District level Publications			
		Workshops	Regional, District and community level	Project concept, Mode of selection of beneficiary communities, benefits, impacts	EPA, MESTI
Community durbars and Consultation with affected parties	Community Level stakeholders	Project concept, Mode of selection of beneficiary communities, benefits, impacts	EPA, MESTI		

Project stage	List of information to be disclosed	Method proposed	Target Stakeholders	Topic of consultation	Responsibility
		Distribution of printed documents in relevant institution	National, Regional and district stakeholders Community level	Project concept, benefits and impacts	EPA, MESTI
Implementation Phase	ESMP, Labor Management Procedure, Occupational Health and Safety Plan Emergency preparedness and response Project Monitoring and safeguard compliance report	Official websites Community Information Centres	International, National, Regional and district stakeholders	projects benefits, impacts (Security, GRM, GBV issues and mitigation)	MESTI, EPA, FC, Project Management Unit, Safeguards Team
Operational Phase	Quarterly and Annual Performance reports Environmental and Social Audit reports Updates on project activities	Notice boards of RCCs, Regional and District level offices of EPA, MC	Regional and district stakeholders	project performance, GRM, Security, GBV education	Project Management Unit
Completion Phase	Project Completion Report	Institutional completion reports	All Stakeholders	Project results	Project Management Unit

3.3 Proposed Strategy to Incorporate the View Of Vulnerable Groups

The principle of inclusiveness will guide the stakeholder engagements, particularly with respect to vulnerable individuals and groups. In cases where vulnerable status may lead to people's reluctance or physical incapacity to participate in large-scale community meetings, the project will hold separate small group discussions with them at an easily accessible venue. This way, the project will reach out to groups who, under normal circumstances, may be insufficiently represented at general community gatherings. Some strategies to be adopted to reach out to these groups include:

- Identify leaders of vulnerable and marginalized groups to reach-out to these groups
- Through the existing industry associations, maintain a database of marginalized groups e.g. Federation of Disabled Persons.
- Leverage existing mining and e-waste projects which include vulnerable populations who overlap with this project to use their systems to identify and engage them
- Engage community leaders, CSOs and NGOs working with vulnerable groups
- Organize face-to-face focus group discussions with these populations

4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING PLANNED SEP ACTIVITIES

4.1 Resources Required

Funding for the SEP implementation will be included as part of project cost under component 4.

4.2 Project Implementation Arrangements

National Steering Committee (NSC): The NSC will have overall oversight responsibility for coordination and field costs and operating and administrative costs of the project. It will be co-chaired by the Ministry of Environment Science Technology & Innovation and Ministry of Lands and Natural Resources. Other members include the Ministry of Finance; Ministry of Health, Ministry of Local Government and Rural Development; Ministry of Trade; Ministry of Water and Sanitation; Ministry of Monitoring and Evaluation; Ministry of Food and Agriculture; Ministry of Chieftaincy; Ministry of Defence; and Ministry of National Security. National house of chiefs. Ministry of Justice and Attorney General's Department.

Implementing Agencies: The lead implementing agency is the Environmental Protection Agency (EPA) under the Ministry of Environment Science, Technology, and Innovation (MESTI). EPA is responsible for regulating and monitoring e-waste management, following Article 6 of the Stockholm Convention on wastes and relevant guidance and works closely with the Minerals Commission in regulating and monitoring mercury use in ASGM in accordance with the country's mining laws.

Project Implementation Unit: A PCU will be mainstreamed in EPA and be responsible for overall project management, facilitation of work programs, fiduciary management, supervision of implementation and project reporting. The PCU will coordinate the project under the leadership of the Executive Director or

Deputy Executive Director (Technical Services) of EPA. EPA will provide dedicated staff for the positions of Project Coordinator (at Senior level), Monitoring and Evaluation officer, Environmental and Social Management officer, Finance and Accounts officer, communication officer and procurement officer. A Deputy Coordinator will be recruited, focusing on the Project’s dimension not covered by the coordinator (e.g., ASGM or e-waste). Depending on investments considered under Component 3, and their social implications, Social Development Specialists might be further recruited to cover social safeguards aspects. PCU staff resources may be supplemented from time to time as needed with short term consulting expertise for financial management, procurement, environmental and social management, communication, reporting and logistics. The PCU will coordinate closely with EPA and MC and will be responsible for preparing work plans and budgets for implementation. Again, the PCU will coordinate closely with the PCU for the proposed Artisanal and Small-Scale Mining Formalization (P168002) and the Project management unit (PMU) for the Forest Investment Program (FIP) - Enhancing Natural Forest and Agroforest Landscapes Project (P163745). The PCU will also serve as the secretariat to the National Steering Committee.

Table 7: Summary of key Institutions/Focal Persons and their Responsibilities

Institutions/ Focal persons/ Unit	Responsibilities
National Steering Committee (NSC)	<ul style="list-style-type: none"> ▪ Oversight responsibility for entire project implementation
Project Implementation Unit	<ul style="list-style-type: none"> ▪ Overall Coordination
Environmental and Social Safeguards Specialists	<ul style="list-style-type: none"> ▪ Facilitate implementation of SEP ▪ Incorporate SEP guidelines in contractors’ agreement ▪ Organize and conduct national and district level training ▪ Develop manuals and modules for capacity building and awareness creation ▪ Facilitate monitoring and coordinate monitoring activities ▪ Develop and ensure effective implementation of GRM ▪ Liaise with relevant institutions on environmental and social issues

5.0 GRIEVANCE MECHANISM (GRM)

The main objective of a Grievance Redress Mechanism (GRM) is to assist an entity to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

- Avoids the need to resort to judicial proceedings.

Having multiple stakeholders, the project could lead to complaints, misunderstandings, conflicts and disputes. The project will provide a grievance mechanism that would provide all direct and indirect beneficiaries, service providers and other stakeholders the opportunity to raise their concerns. Stakeholders would be informed of the grievance mechanism in place, as well as the measures put in place to protect them against any reprisal for its use. This will be done during sensitisations and other interactions with stakeholders.

5.1 EPA Grievance Redress Mechanism

The Project Management Unit will be hosted at the EPA and the agency has an existing GRM process. EPA also has Regional Offices as well as some district offices which will serve as channels for lodging complaints. Case resolutions would mainly be the responsibility of EPA and PCU and would only be transferred to relevant agencies, when all attempts fail. The Safeguards Specialist or a dedicated staff at the PCU would be responsible for management of the central grievance redress system. Grievance Redress Mechanism Complaint Form is provided in Annex 5.

The proposed GRM recommends four key steps as follows:

- Receive and register grievances or complaints;
- Acknowledge, assess and assign (Acknowledge receipt of grievance, outline how grievance will be processed, assess eligibility and assign responsibility)
- Propose Response
- Agreement on Response
- If agreement is reached, implement agreement
 - If agreement is not reached, review case and
 - If no agreement is reached under the review process, then the case can be referred to the law courts.



5.2 Recommended Grievance Redress Time Frame

Table 8 below presents the recommended time frames for addressing grievance or disputes related to resettlement and compensation. It is envisaged that resettlement/ compensation disputes could be resolved at the community or regional levels.

Table 8: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 24 hours
3	Assess grievance	Within 24 hours
4	Assign responsibility	Within 2 Days
5	Development of response	within 7 Days

6	Implementation of response if agreement is reached	within 7 Days
7	Close grievance	within 2 Days
8	Initiate grievance review process if no agreement is reached	within 7 Days
9	Implement review recommendation and close grievance	within 14 Days
10	Grievance taken to court by complainant	-

5.3 Grievance Documentation and Reporting

Resolved and escalated grievances/cases would be documented daily (as tickets) into the EPA centralised GRM system by the assigned grievance Officer. The Safeguards Specialist or a dedicated staff at the PCU would exercise oversight over the system and track the resolution of all grievances/cases.

Monthly case/ grievance reports will be generated from the system by the Safeguards Specialist or a dedicated staff at the PCU and report to the Project Coordinator to inform management decisions. Quarterly reports would also be generated and reported to the MESTI as part of the Project's Progress Reporting to the World Bank. Periodic reports will also be generated within a reasonable time frame for stakeholders upon request irrespective of the period (e.g bi-annual, annual etc.)

6.0 MONITORING AND REPORTING

Monitoring and Tracking of Stakeholder Engagement is important to ensure effective continuous engagement and follow-up and to minimize slippages and oversight of important engagements. The Environmental Health and Pollution Management Program will maintain a Stakeholder Engagement Log that chronicles all stakeholder engagement undertaken or planned. The Engagement Log includes location and dates of meetings, workshops, and discussions, and a description of the project-affected parties and other stakeholders consulted. Monitoring reports presented to the Steering Committee and the Bank will include Stakeholder Engagement Logs as well as feedback from the GRM. It may also include for instance, how the project implementation agency responded to the concerns raised, how these responses were conveyed back to those consulted, details of outstanding issues and any planned follow up. There will be annual reporting of the SEP as part of the project monitoring report.

The Project will also develop an evaluation form to assess the effectiveness of every formal engagement process. The questions will be designed as appropriate for the relevant audience.

6.1 Involvement of Stakeholders in Monitoring Activities

As indicated earlier, the Project Management Unit will have oversight over the SEP implementation. The Environmental and Social Safeguards Specialists and focal persons in project districts and regions will monitor the Stakeholder Engagement Plan (SEP) in accordance with the requirements of the legal agreement, including the Environmental and Social Commitment Plan (ESCP). The team will monitor and document any commitments or actions agreed during consultations, including changes resulting from changes in the design of the project or the SEP.

Data for monitoring of beneficiaries, enterprises, associations and cooperatives, and training providers, will be collected through self-reporting, following a schedule and using standardized forms and procedures. Information from these beneficiaries will also be collected through monitoring visits by

assigned staff from implementing ministries and agencies. In addition to the monitoring responsibilities by the PCU and the respective implementing ministries and agencies, independent third parties will also be engaged periodically to monitor progress and performance on the project.

6.2 Reporting Back to Stakeholder Groups

Reports back to stakeholder groups will be done through various means including national annual sector performance review meetings of all the implementing agencies. Through the project's planned communication channels, results of the project will be disseminated to stakeholders at the national and sub-national levels.

ANNEXES

Annex 1: Photos of Stakeholder Engagement Workshops on Mercury Initial Assessment



Group picture of participants at the inception meeting



UNDP Assistant Country Director – Programme making a speech at the validation workshop



Cross section of participants at the validation workshop



Annex 2: Stakeholders Engaged on Mercury Initial Assessment

Name	Institution	Name	Institution
F. Ohene-Mensah	AFI	Roger Gardiner	Ghana Revenue Authority Custom Division
Manuela D. Nelson	Asanko Gold	Joachim Davies	Ghana Revenue Authority Custom Division
NiiAdjetei Kofi Mensah	ASMAN	Mariam A. Rahman	Gold fields Ghana Limited
Tracy Jane-Lake	Attorney Generals Department	Charlotte Dsidsorna	Golden Star Bogoso
Vivian	Birth and Death Registry	Samuel Dotse	HATOF
Samuel Obiri	Centre for Environmental Impact Assessment	Larsey Mensah	Institute of Environmental Compliance and Sustainable Development
Dr. K. A Asante	Centre for Scientific and Industrial Research-Water Research Institute	Kwaku Treveh	International Labour Organization
Richard Ellimah	Centre for Social Impact Studies	RazafindrakotoMamyLalaina	International Labour Organization
Kenneth Kwame SwanzyEssuman	Chamber of Commerce - Tarkwa	Kwame Mensah	KASA Ghana
F-Ohene-Mensah	DEI	Smart-Abbey Ahimah	KASA Ghana
E. Odjam-Akumatey	Ecological Restoration	Priscilla Attafuah	Kinross Gold
Haruna	Energy Commission	Jonathan Hogarh	Kwame Nkrumah University of Science and Technology
Anifat Abu-Mahama	Environmental Protection Agency	Esther	Korle Bu Teaching Hospital
Diane Gasinu	Environmental Protection Agency	Eugene N. Korletey	Labour Department
Dr. Sam Adu-Kumi	Environmental Protection Agency	Nelson Ahedor	Minerals Commission
Ebenezer Appah-Sampong	Environmental Protection Agency	Frank Sofo	Ministry of Local Government & Rural Development.
Esi Nerquaye-Tetteh	Environmental Protection Agency	Cecelia Ansah-Obiri	Ministry of Employment and Labour Relations
Faisal Seidu	Environmental Protection Agency	Fredua Agyemang	Ministry of Environment, Science, Technology and Innovation
Felisa Owusu-Darko	Environmental Protection Agency	Amos Nana Acquah	Ministry of Finance
Gabriel Anthony Ampiah	Environmental Protection Agency	Dennis Akunmle	Ministry of Finance
George Lamptey	Environmental Protection Agency	Elizabeth Nancy Ameyaw	Ministry of Finance
Gift Attah	Environmental Protection Agency	Jones Obeng	Ministry of Finance
Gift Tetteh	Environmental Protection Agency	Konney Theresa	Ministry of Finance
Humu Saeed	Environmental Protection	Kwesi Asante	Ministry of Finance

	Agency
Irene Parker-Allotey	Environmental Protection Agency
J.C Edmund	Environmental Protection Agency
John A. Pwamang	Environmental Protection Agency
John Tettey	Environmental Protection Agency
Justine SeyireOzadzie	Environmental Protection Agency
K. E Gura-Sey	Environmental Protection Agency
Kafui Boni	Environmental Protection Agency
Kani Lawrence Jnr	Environmental Protection Agency
Lawrence Kani Jnr	Environmental Protection Agency
Lovelace Sarpong	Environmental Protection Agency
Michael Sandow Ali	Environmental Protection Agency
Nathan Quao	Environmental Protection Agency
SelaseSedzi	Environmental Protection Agency
V.K Nartey	Environmental Protection Agency
Victoria Leba-Kamanya	Environmental Protection Agency
Victoria Leba-Kamanya	Environmental Protection Agency
Yussif D. Iddisah	Environmental Protection Agency
Dr. Crentsil Kofi Bempah	Environmental Youth Action Network/Ghana Atomic Energy Commission
ShallovernSrodah	Federation of Ghana Goldsmith & Jewellers
Solomon Kusi Ampofo	Friends of the Nation
Gloria	Ghana Association of Small Scale Miners
Comfort Okoe	Ghana Bauxite Company Ltd

Theresa Konney	Ministry of Finance
Francisca Atuluk	Ministry of Gender
Patricia Dovi Sampson	Ministry of Information
Deborah Mensah	Ministry of Interior
Opoku Jacob	Ministry of Interior
Ursula Renette Amoah	Ministry of Justice
Ben Aryee	Ministry of Lands & Natural Resources
Benjamin Aryee	Ministry of Lands & Natural Resources
Rebecca Bortey	Ministry of Trade & Industry
Michael A. Senayah	Ministry of Trade & Industry
Samuel Cudjoe	National Petroleum Authority
Susan Keane	Natural Resource Defence Council
Doreen O. Drapson	Newmont Ghana Limited
Vivian Odame	Perseus Mining Company
NafisatuYussif	Solidaridad West Africa
Nana Quame	Tema Metropolitan Assembly
Joel Ayim Darkwah	United Nations Development Programme
Louis Kuukpen	United Nations Development Programme
Paolo Dalla Stella	United Nations Development Programme
Etienne Gonin	United Nations Development Programme (MPU/Chemicals)
Abena Nakawa	United Nations Development Programme /Ministry of Health
Dr. Richard Amfo-Otu	United Nations Development Programme /Presbyterian University College

Victoria	Ghana Crematoria Society
Felicia Hukportie	Ghana Gas Company
Dr. Carl Osei	Ghana Health Service/Ministry of Health
Dr. Edith Clarke	Ghana Health Service/Ministry of Health
Emmanuel Dzeble	Ghana National Association of Small Scale Miners
Emmanuel YirekyiAntwi	Ghana National Association of Small Scale Miners
Daniel Asare	Ghana Ports and Harbour Authority

Joseph Yeboah	United Nations Industrial Development Organization
Fakhruddin Azizi	United Nations Industrial Development Organization
Yomi Banjo	United Nations Industrial Development Organization
Nelson Manda	United Nations Institute for Training and Research
Dr Ishmael Quaicoe	University of Mines and Technology
Isaiah Tuotienne	US Embassy
Karen Bel	US Embassy
Kate Ansah	Volta Aluminum Company
Georgette Sakyi-Addo	WIM & AMN
Sandra A.A.O. Donkor	WIM Ghana
Asferacew Abate	World Bank
Akosua Kwakye	World Health Organization

Source: Minamata Convention on Mercury Initial Assessment Report for Ghana, 2018

Annex 3: Stakeholder Workshop on Public Health Challenges in ASGM Communities

In case of reply, the number and the date
Of this letter should be quoted

My Ref. No.

Your Ref. No.



Ghana Health Service
Private Mail Bag
Ministries
Accra-Ghana

E-mail: carl.osei@ghsmaail.org

28th October 2019

Dear Sir/Madam,

INVITATION TO A NATIONAL STAKEHOLDER DISSEMINATION WORKSHOP: ASSESSMENT OF PUBLIC HEALTH CHALLENGES IN ARTISANAL AND SMALL-SCALE GOLD MINING (ASGM) COMMUNITIES IN GHANA AND THE LOCAL HEALTH SYSTEM'S READINESS TO RESPOND

Artisanal and Small-Scale Gold Mining (ASGM) in Ghana exposes miners, their families and communities to a range of occupational and public health risks from the use of mercury. Since July this year, the World Health Organisation (WHO), the Ministry of Health and Ghana Health Service (GHS) have collaborated to conduct a WHO-led project study that will contribute to the development of the "health component" of a National Action Plan (NAP) for country-level implementation of health aspects of the Minamata Convention on mercury. This is in line with Article 7 of the Convention which has a focus on addressing the health effects of mercury exposure in ASGM.

The project study, which involved an institutional capacity assessment; rapid health situation assessment in ASGM communities and an assessment of local health system capacity to respond to ASGM related health issues, has been completed and a national stakeholder workshop is being organized to bring together a broad range of policy/decision-makers and development partners operating within the domains of health, environment and mining, at national and sub-national levels for dissemination of the results and provide inputs into project recommendations for the NAP.

On behalf of the project team, I take this honour to invite you or your representative (as indicated on the distribution list) to attend a two-day residential workshop scheduled as follows:

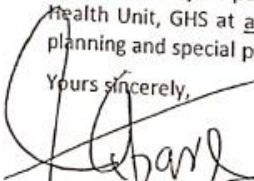
Date: 12th to 13th November 2019; ARRIVAL: 11th NOV. 2019 after 2 pm.

Venue ARUBA GUEST LODGE, ABUKU

GHS will cover the cost of travel and hotel accommodation for participants as indicated on the attached distribution list. Other participants not covered by GHS are expected to arrange for their own accommodation or attend meetings on non-residential basis.

Kindly confirm your participation by contacting Mrs. Agnes Armah of the Occupational and Environmental Health Unit, GHS at armah.agnes@yahoo.com or tel. 0243527888, by 6th November 2019 to facilitate planning and special provisions.

Yours sincerely,


DR. ANTHONY NSIAH-ASARE
DIRECTOR GENERAL

INVITED PARTICIPANTS		NU IN
1	Representative of Mining community, Birim North District	
2	Representative of Mining community, Tarkwa-Nsuaem Municipal	
3	Municipal Director of Health Services, Birim North District	
4	Municipal Director of Health Services, Tarkwa-Nsuaem Municipal	
5	Municipal Chief Executive, Birim North Municipal Assembly	
6	Municipal Chief Executive, Tarkwa-Nsuaem Municipal Assembly	
7	Representative, GNASSM, Birim North Municipal	
8	Representative, GNASSM, Tarkwa-Nsuaem Municipal	
9	Representative, Trades Union Congress	
10	Susan Keane, National Resources Defence Council	
11	Chief Executive Officer, Friends of the Nation	
12	Secretary, Inter-ministerial Committee on illegal Mining	
13	Chairman, Water Resources Commission	
14	The Minister, Ministry of Environment, Science, Technology and Innovation	
15	The Minister, Ministry of Health	
16	Chief Director, Ministry of Lands and Natural Resources	
17	Chief Director, Ministry of Trade and Industry	
18	Office of Chief Director, Ministry of Sanitation and Water Resources	
19	Executive Director, Centre for Scientific & Industrial Research (CSIR)	
20	Chief Executive, Environmental Protection Agency	
21	Chief Executive, Ghana Minerals Commission	
22	Country Representative, ILO, Ghana	
23	Country Representative, UNDP, Ghana	
24	Country Representative, UNIDO, Ghana	

ISSUES
+ What ple think about ASM

INVITED PARTICIPANTS	
25	Country Representative, WHO, Accra
26	Country Director, Aurum Institute, Ghana
27	Head, Sustainable Development Cluster, UNDP
28	Director General, Ghana Health Service
29	Director, Public Health Division, GHS
30	Regional Director of Health Services, GHS, ER
31	Regional Director of Health Services, GHS, WR
32	The Executive Director, Precious Mineral Marketing Company
33	The Minamata Convention Focal Point, EPA
34	President, Association of Small-Scale Miners (ASSMAN)
35	President, Ghana National Association of Small-Scale Miners (GNASSM)
36	Social Development/ Environment Specialist, World Bank
37	Principal Investigator, Dr. Mirko Winkler, Swiss Tropical and Public Health Institute
38	Members, Expert Team of International Consultants
39	Consultant /Project Co-ordinator, WHO, Ghana
40	Programme Officer / Project Co-ordinator, WHO, Ghana
41	Focal Person, Chemicals, WHO/ AFRO
42	Focal Person, ASGM Project, WHO/HQ
43	Director Technical Directorate, Project Focal Person, MOH
44	Gender Expert MOH/GHS
45	Head, Poisons Centre, Occup. & Env. Health Unit, GHS
46	Program Manager, Occup. & Env. Health Unit, GHS
47	Secretarial staff, Occup. & Env. Health Unit, GHS
48	The Media

Annex 4: Photos of Stakeholder Engagement During Ghana e-Waste Country Assessment



Source: Ghana e-Waste Country Assessment Report

Annex 5: Grievance Redress Mechanism Complaint Form



COMPLAINT FORM

Complaint Registration Number.....

PART ONE

COMPLAINT DATA

(To be completed by the complainant OR by the complaints desk for mailed complaints and phone calls)

1.1 Information on the offending activity

Name of alleged offender/ violator.....

Address.....

Telephone No.....

E-mail Address..... 1.2 **Brief**

description of the complaint (where necessary attach additional sheet)

.....
.....
.....

1.3 Information on alleged source

- Type of activity..... ☐ Location (provide sketch).....
- Date offending activity detected.....
- Nature of violation (check YES/NO)
Continuous Yes[] No[] Intermittent/ On and Off Yes[] No[]

1.4 Complaint Report History

- Has Complaint been reported before? Yes [] NO []
- TO EPA? Yes [] No []
- If yes indicate the following
- Was the report made verbally? Yes [] No []
- Date of report.....
- Office reported Head Office [] Regional Office []

1.5 Complainants Particulars

- Name

➤ Address..... ☐ Telephone

No..... ☐ Fax

No.....

➤ Signature..... ☐

Time.....Date.....

➤ Email Address.....

1.6 **Do you request that identity be kept confidential?** Yes [] No []

1.7 **How do you want to be contacted?** E-mail [] Telephone No. []

1.6 EPA receiving officer/Complaints Desk

Name of Officer.....Signature.....Date.....

ENVIRONMENTAL PROTECTION AGENCY

EMAIL : info@epa.gov.gh

TELEPHONE : 0302664697/8

PART TWO

COMPLAINT REFERRAL FOR INVESTIGATION

(To be completed by EPA Officials)

2.1 Registration of complaint

➤ Is complaint Registered Yes [] No []

➤ If yes, specify the registration number.....

2.2 Referral to Appropriate Department / Region (Check)

➤ Building Environment []

➤ Natural Resources []

➤ Mining and Industry []

➤ Inspectorate []

➤ Regional Programme Officers []

➤ Environmental Quality []

PART THREE

COMPLAINT INVESTIGATION SUMMARY REPORT

(To be completed by the investigator)

3.1 Verification of information on the alleged offender/ violator

- Name (registered activity/ individual responsible).....
- Address..... ☐ Telephone No.....
- Fax No..... ☐ E-mail.....

3.2 OBSERVATION AND FINDINGS

3.2.1 Offending activity.....

3.2.2 Location (check) GPS Reading

Residential [] Commercial [] Industrial [] Mixed [] 3.2.3

Pollution Type (check)

Noise [] Dust/particulate/smoke [] Water []
 Land degradation [] Odour []

3.2.4 Source/ causes

Improper siting [] Poor Environmental Management Practice []

Other(s),

Specify.....

3.2.5 Potential impact on public health (check)

Immediate [] Short Term [] Long Term []

Other(s), Specify.....

ENVIRONMENTAL PROTECTION AGENCY

EMAIL : info@epa.gov.gh

TELEPHONE : 0302664697/8

5. Tanzania SEP

6. Kenya SEP