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Province of Midelt

NOOR MIDELT I - Solar power plant project

Stakeholder Engagement Plan

SEP

CL

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Draa-Tafilalet

NOOR MIDELT I SOLAR POWER PLANT PROJECT

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ABRÉVIATIONS

Abréviation	Signification
AFD	Agence Française de Développement
AfDB	African Development Bank
CNEIE	Committee National de EIE
EIA	Environmental Impact Assessment
EIB	European Investment Bank
EPC	Engineering, Procurement and Construction
FESIA	Framework Environmental and Social Impact Assessment
GDI	Gender Development Index
HDI	Human Development Index
IFC	International Finance Corporation
INDH	Initiative Nationale pour le Développement Humain (National Initiative for Human Development)
KfW	Kreditanstalt für Wiederaufbau
MASEN	Moroccan Agency for Solar Energy
O&M	Operation and Maintenance
ONEE	Office National d'Electricité et de d'Eau Potable
PS	Performance Standards on Environmental and Social Sustainability
SEP	Stakeholder Engagement Plan
SESIA	Specific Environmental and Social Impact Assessment
UNDP	United Nations Development Program
WB	World Bank
WHO	World Health Organisation

1. Introduction

The Moroccan Agency for Solar Energy (MASEN), the public company that sponsors solar energy in the Kingdom of Morocco, has declared EDF Renewables - Masdar – Green of Africa - as winning bidder to develop the NOOR Midelt I project within the NOOR Solar Power Complex (the Complex). The Complex is located within the Zaida and Mibladen commune in the province of Midelt, Morocco.

EDF Renewables – Masdar – Green of Africa will be responsible for the design, engineering, procurement, , construction, permitting, completion, start-up, testing, commissioning, operation and maintenance of the solar power plant for a 25-year period.

The project have to be compliant with environmental and social Moroccan standards and with international requirements :

- World Bank/International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability (2012)
- KfW Sustainability Guidelines
- AfDB Environmental Safeguard Policies
- EIB environmental and social standards
- AFD Environmental Safeguard Requirements

A stakeholder engagement plan during the lifetime of the project is a requirement of the international requirements.

2. Objectives of the Stakeholder Engagement Plan

Stakeholders are persons or groups of communities who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, or other businesses.

Stakeholder engagement is an on-going process that starts at the SESIA phase and should extend through the lifetime of the project. Stakeholder engagement involves a range of activities such as public disclosure of appropriate information, consultation with stakeholders, and mechanisms by which people can make comments and raise grievances.

This Stakeholder Engagement Plan has been prepared with the aim of:

- Identify the stakeholder engagement requirements;
- Outline a systematic approach to build and maintain a constructive relationship with the project stakeholders; and
- Set up a system to appropriately manage and respond to grievances from the local communities and other stakeholders.

3. Regulations and requirements

This chapter presents the regulations and requirements specifically related to stakeholder engagement. The applicable environmental and social legislation and requirements are provided in detail in the SESIA.

3.1 National requirements

The requirements for public information as part of the environmental and social impact studies are established by Decree No. 2-04-564 of 5 Kaada 1429 (November 4th 2008) that “establish the procedure for organizing and holding the public inquiry for projects subject to environmental and social impact studies” under Law No. 12-03 related to environmental impact studies and promulgated by Dahir No. 1-03-60 of 10 rabii I 1424 (May 12th 2003).

The main provisions of this decree are:

The request to open a public inquiry is filed by the petitioner accompanied by a file including the following documents in Arabic and French languages:

- a fact sheet highlighting the main technical characteristics of the project submitted to a public inquiry;

- a non-technical summary of the draft impact assessment, i.e. a clear and comprehensible document for the public including the information and main data contained in the EIA, specially including those related to the positive and / or negative impacts of the project on the environment and the measures envisaged to eliminate, reduce or offset any adverse effects of the project on the environment;
- a site plan indicating the limits of the expected impact zone of the project.

The public inquiry is opened by order of the prefecture or province's concerned governor within a period not exceeding ten (10) working days from the date of the request.

The conduct of the public inquiry is entrusted to a committee chaired by the local administrative authority of the place where the project will be implemented and is composed of:

- president (s) of the municipality or municipalities concerned or the representative;
- representative of the government authority responsible for the environment ;
- representative or governmental authorities (s) responsible for the sector concerned by the project at national or regional level, as appropriate ;
- any person invited by the president to help the commission in its work, including an expert, if deemed necessary, for particular aspects.
- The public inquiry opening order must specify:
 - the nature of the project, its consistency and its location;
 - the population affected by the public inquiry within the limits of the project impact area subject to EIA;
 - the opening and closing dates of public inquiry;
- the place or places of consultation as well the place (s) where public comments and proposals will be collected;
- the names and positions of the President and Members of the Committee referred to in Article 4 above, that are responsible for the implementation of the public inquiry.

The order with the opening of the public inquiry is brought to public knowledge at least fifteen days before the opening date through publication in at least two daily newspapers, of which one must be in Arabic, authorized to receive legal notices, and displayed in the premises of municipalities concerned. This display is maintained throughout the duration of the public inquiry. Furthermore, the Commission may use any other appropriate means of communication, including audio-visual means, ensuring that the necessary information on the public inquiry reaches the population.

For the duration of the inquiry, the president of the Commission must take all necessary steps to enable the population concerned to access the consultation file, making it available at least at the headquarters of the municipalities concerned.

The president also makes public a registry in order to record observations and suggestions about the project. The duration of the public inquiry is twenty (20) days. Upon expiry of this deadline, the Commission shall formulate the public inquiry report on the basis of the observations contained in the registry and summarizing the comments and proposals made by the population concerned about the project.

The public inquiry report and registry forwarded shall be by the President to the chairman of the National Committee on EIA (CNEIE, or to the president of the Regional Committee of the impacted study area within eight (8) days from the closing date of the public inquiry.

In summary, Moroccan law requires a public inquiry of 20 days, during which the population, previously informed by the regional ministry by means of press publication is invited to consult the Project environmental and social documentation (including a non-technical summary), and provide their observations in a registry, which will then be taken into account in the final report of the commission. Note that the regulation does not specifically require public meetings, but it also does not proscribe it. In practice, most large projects do not just provide the project documentation to the public, but also organize public information meetings and consultations in the framework of public inquiries.

For NOOR Midelt 1 project, the Public inquiry was carried out for the full NOOR Midelt Complex a per the FESIA process. No public inquiry is needed for NOOR Midelt 1 project.

3.2 IFC Requirements

All the IFC Performance Standards (2012) and EIB Performance standards require meaningful stakeholder engagement. The IFC first performance standard "Social and Environmental Assessment and Management

Systems” and the 10th EIB performance standard “Stakeholder participation » describe the stakeholder engagement requirements in more depth. It states the following:

3.2.1 Stakeholder Engagement

Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to Affected Communities. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project’s risks and adverse impacts, and the project’s phase of development.

► Stakeholder Analysis and Engagement Planning

Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities the client will identify the Affected Communities and will meet the relevant requirements described below.

The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

► Disclosure of Information

Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client will provide Affected Communities with access to relevant information on:

- The purpose, nature, and scale of the project;
- The duration of proposed project activities;
- Any risks to and potential impacts on such communities and relevant mitigation measures;
- The envisaged stakeholder engagement process;
- The grievance mechanism.

► Consultation

When Affected Communities are subject to identified risks and adverse impacts from a project, the client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. The extent and degree of engagement required by the consultation process should be commensurate with the project’s risks and adverse impacts and with the concerns raised by the Affected Communities. Effective consultation is a two-way process that should:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an on-going basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and
- Be documented.

The client will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement.

3.2.2 External Communications and Grievance Mechanisms

► External Communications

Clients will implement and maintain a procedure for external communications that includes methods to

- Receive and register external communications from the public;
- Screen and assess the issues raised and determine how to address them;
- Provide, track, and document responses, if any; and
- Adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.

► Grievance Mechanism for Affected Communities

Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.

► On-going Reporting to Affected Communities

The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve on-going risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.

4. Stakeholder identification and analysis

4.1 Identified stakeholders

The stakeholders of the project are classified in two categories:

- Affected Stakeholders, i.e. the people or institutions that may potentially be affected by one or more of the potential impacts of the project.
- Interest Based Stakeholders, which potentially include public agencies concerned with any of the project activities, national and international non-governmental organizations and the interested part of the civil society.

The table below outlines the identified stakeholders and their interest in the project. This list is not exhaustive and may be completed especially during public consultation. Where applicable this SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable stakeholders.

Table 1: List of Stakeholders

Stakeholders	Type	Relation with the project
Agence Nationale de l'Emploi et de la Promotion des Compétences	Interest Based – Government Agency	Employment

Stakeholders	Type	Relation with the project
Agence urbaine de Errachidia – Midelt – antenne de Midelt	Interest Based – Government Agency	Construction permit
Centre Régional d'Investissement - Errachidia	Interest Based – Government Agency	To support business creation
Commune de Mibladen (local leaders and local population)	Affected Stakeholder	Solar power plant on the territory
Commune de Zaida (local leaders and local population)	Affected Stakeholder	Solar power plant on the territory
Commune de Aït Ben Yacoub (local leaders and local population)	Affected Stakeholder	Neighboring commune
Commune de Midelt (local leaders and local population)	Affected Stakeholder	Location of the main public services Neighboring commune
Delegation de Energies et Mines	Interest Based – Government Agency	Permitting
Delegation de l'ABHSM (Agence du Bassin Hydraulique de Moulouya)	Interest Based – Government Agency	Permitting
Délégation du commerce et de l'industrie	Interest Based – Government Agency	The project will impact commercial and industrial development
Delegation du Ministere de la Sante	Interest Based – Government Agency	The project will require health services
Délégation Provinciale du Tourisme	Interest Based – Government Agency	The project could impact tourism activities
Direction Provinciale de l'Equipeement et du Transport	Interest Based – Government Agency	Transport and traffic organization and permitting
Direction Provinciale des Eaux et Forêts et de la Lutte Contre la Désertification de Midelt	Interest Based – Government Agency	Biodiversity protection
Direction provinciale de l'agriculture	Interest Based – Government Agency	Agriculture as the main activity in the province.
Direction Régionale de l'Environnement d'Errachidia -	Interest Based – Government Agency	Environment impact and monitoring
INDH - Midelt	Interest Based – Government Agency	Employment development. Vulnerable group identification
MASEN	Interest Based Operational actor	Owner of the land and part of project company
Office de la Formation Professionnelle et de la Promotion du Travail - Midelt	Interest Based – Government Agency	Training and employment
Institut Spécialisé de Technologie Appliquée - Midelt	Interest Based – Government Agency	Training and employment
ONEE –Branche Electricité - Midelt (Office National de l'Electricité)	Interest Based Operational actor	Power buyer
Province de Midelt	Interest Based – Non-Government Agency	Coordination of the various technical and public services et liaison with population
Chambre de commerce, d'industrie et de services de Draa Tafilalet	Interest Based – Non-Government Agency	Liaison for business development

Stakeholders	Type	Relation with the project
Representatives of ethnic communities involved in the project (Ait Ouefla, Ait Rahou Ouali)	Affected Stakeholder	Communities in the area of the project. Land users before the project.
Association Jeunesse pour le développement	Interest Based – Non-Government Agency	To define
Association de fraternité et développement	Interest Based – Non-Government Agency	To define

4.2 Vulnerable Stakeholders

From the point of view of the stakeholder engagement process, vulnerable stakeholders are groups that, due to one or more specific characteristics, might have specific difficulties participating in the stakeholder engagement process.

The stakeholder analysis and the review of available information has indicated no vulnerability for Interest Based Stakeholders.

The following sources of vulnerability are expected among Affected Stakeholders (community members, land owners/users):

- Women: The Gender Development Index¹ in Morocco was 0.838 in 2017 (the Human Development Index female was 0,598 and the Human development Index male was 0,713). The Gender Inequality Index² (2017) was 0.482. These UNDP indicators show that women are disadvantaged and this vulnerability is generally higher in rural areas;
- The poor: Poor community members are less likely to attend stakeholder engagement activities, specifically when there is a specific cost associated with attendance (e.g. transport costs). The poverty rate of the municipalities of Zaïda, Mibladen and Ait Ben Yacoub is 3 to 5 times higher than the national rate;
- The illiterate: Illiterate community members are not able to review disclosed documents or provide written feedback, and may face difficulties to meaningfully engage with the information provided. In Mibladen and Aït Ben Yacoub, more or less 50% of the population over 10 is illiterate. This rate is reduced to almost 40% in Zaïda. Illiteracy affects between 50% and 60% of women according to the municipalities. These rates remain well above the national average;
- The disabled: Disabled or sick community members face additional challenges attend certain stakeholder engagement activities such as meetings, focus groups or workshops;
- Computer illiteracy / lack of Internet access: The SESIA requirements include online disclosure of SESIA documentation. The lack of internet access or computer illiteracy can prevent some community members to access this information.

5. Public consultation

In order to comply with the guidelines of the lenders, public information meetings must be conducted. The process started with the completion of the public inquiry according to the law 12-03 and a first meeting of public consultation of presentation of the FESIA.

¹ The GDI measures gender gaps in human development achievements by accounting for disparities between women and men in three basic dimensions of human development—health, knowledge and living standards using the same component indicators as in the HDI. The GDI is the ratio of the HDIs calculated separately for females and males using the same methodology as in the HDI. It is a direct measure of gender gap showing the female HDI as a percentage of the male HDI.

² A composite measure reflecting inequality in achievement between women and men in three dimensions: reproductive health, empowerment and the labour market.

5.1 Public Inquiry under Law 12-03

The public inquiry carried out under Law 12-03 was conducted from June 30 to July 20, 2015 for the full NOOR Midelt Complex.

The FESIA was presented to the CNEIE on 8 October 2015 and environmental acceptability was pronounced on 1st December 2015 at the second CNEIE meeting.

5.2 Public consultation meeting for the FESIA

A stakeholder engagement meeting was undertaken for the FESIA of the project of Midelt Solar Power Complex in March 2016, in Midelt, bringing together the various stakeholders identified on the project:

- Representatives of ethnic communities involved in the project (Ait Ouefla, Ait Rahou Ouali and Ait Massoud Ouali Ennajib) and Ait Ben Yacoub concerned by the proximity of the project
- Representatives of the rural municipalities of Zaïda, Ait BenYacoub and Mibladen and the neighbouring douars of the site (Agoudim, Ait Ghat, Ahouli, Ait Ben Yacoub, Mibladen, Zaida and Midelt);
- Representatives of civil society: development associations, environmental and women's associations, cooperatives, etc.;
- Academics
- Representatives of the external services of the province of Midelt (Equipment and transport, water and forests, water basin agency, ONEE etc.)

During this meeting, the various stakeholders were informed about the project and its possible socio-economic impacts were assessed within the framework of the FESIA. A grievance management mechanism was also presented.

5.3 Public consultation meeting for the SESIA

A second public consultation will be held to present the results of the SESIA to the various stakeholders.. This meeting will need to be expanded to ensure that all stakeholders are informed.

Newspaper publications will be made to inform about the meeting. During the meeting, a presentation of the project as well as the main impacts and measures will be carried out. An exchange of questions and answers will be held with the different participants.

The results of this public consultation (minutes of meeting and presence sheets) will be incorporated into the SEP.

6. Stakeholder engagement plan

6.1 Activities and timeline

Table 2: Stakeholder Engagement Plan - Activities and Timeline

Activity	Timing/detail	Responsibility
1) SESIA Phase Engagement		
National and local SESIA Disclosure		
Disclosure of National SESIA documentation (Hard copies delivered to local stakeholders : local authorities, commune representatives, regional environmental direction)	June 2019	Project Company and CNEI

Activity	Timing/detail	Responsibility
Public Consultation meeting on the project	July 2019	Project Company/ MASEN
Disclose Final SESIA and related documents on website MASEN and EDF Renewables	July 2019	Project Company/ MASEN
Lenders Disclosure	July 2019	
2) Construction Phase Engagement		
Disclosure of the start date of the construction phase	Before starting of construction phase	Project Company
Grievance mechanism (described below)	On-going from the start of the construction phase	MASEN / /Project Company / EPC
Communication with local authorities and communities (meeting)	Regularly (twice a year) and whenever needed	Project Company / MASEN
3) Operation Phase Engagement		
Grievance mechanism (described below)	On-going from starting operation phase	MASEN / /Project Company / O&M
Communication with local authorities and communities (meeting)	Regularly (once a year) and whenever needed	Project Company / MASEN
Annual reporting (environmental and social)	Every year	Project Company

6.2 Grievance Mechanism

The aim of the grievance mechanism is to establish a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the Project's environmental and social performance. The grievance mechanism has the Affected Communities as its primary beneficiaries. It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies.

MASEN is the entity responsible for the implementation of the Grievance Mechanisms for external stakeholders for the NOOR Midelt Solar Power Complex. Project Company is the entity responsible for the implementation of the Grievance Mechanism for NOOR Midelt I. For stakeholders, the way to deposit the grievance is the same regardless of the addressee of the grievance (MASEN or Project Company or EPC).

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

- Clarify at the outset what is the purpose of the procedure;
- Assure people that there will be neither cost nor retribution associated with lodging a grievance;
- The entire process (i.e. how a grievance is received and reviewed, how decisions are made and what possibilities may exist for appeal) will be made as transparent as possible by explaining it to relevant stakeholders;

The grievance mechanism for NOOR Midelt 1 project described below will be implemented during the construction, operational and decommissioning phases of the project at the site gate. All information about grievance procedures, grievance forms, and responses will be explained in Arabic, Tamazight and French. Access to the mechanism will be free of cost.

Coming out with a grievance can pose risks for people, especially if it concerns issues such as corruption, misconduct, monetary compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism will include precautions such as a clear non-retaliation policy, measures to ensure

confidentiality and safeguarding of the personal data collected in relation to a grievance, as well as an option to submit anonymous grievances.

Handling grievances encompasses a step-by-step process as well as assigned responsibilities for their proper completion. Companies establishing grievance mechanisms will follow the process' steps discussed below.

6.2.1 Scope

The scope of the grievance mechanism is to cover all stakeholder's problems and concerns regarding project activities and the implementation of the mitigation and compensation measures identified at the SESIA stage. Generally, all claims from affected communities should be accepted and no judgment made prior to investigation, even if grievances are minor. However, according to best practice, the following claims should be directed outside of project-level mechanisms:

- Grievances clearly not related to the project: It is sometimes difficult to determine which issues are related to the project and which are not. If in doubt, employees designated to receive grievances should accept the grievance and assess its legitimacy;
- Issues related to governmental policy and government institutions;
- Grievances constituting criminal activity and violence: In these cases, complainants should be referred to the justice system;
- Commercial disputes: Commercial matters should be stipulated in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts. Suppliers will have access to the grievance mechanism stipulated in the previous point.

6.2.2 Publicizing Grievance Management Procedures

The grievance mechanisms will be publicized in the following ways as a minimum:

- Posters at the site entrance; and
- Local authorities site
- On the SEP disclosed online.

The information provided online and on posters will be available in all the relevant languages (i.e. Arabic, Tamazight, French and English) and will include at least the following:

- Who can raise grievances (i.e. all stakeholders);
- Where, when, and how community members can file grievances (to agree during the stakeholder engagement process);
- Who is responsible for receiving and responding to grievances;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

In addition, specific measures have been included in the SESIA to ensure that grievances are reported (e.g. all vehicles dedicated full time for the project and circulating on roads outside the project site will have a clearly visible unique identification number and a sign with a telephone number for any road user to report grievances when required).

6.2.3 Submitting a Grievance

The grievance mechanism will allow for grievances to be filed, as a minimum, in the following ways:

- By post;
- By email and/or through an online form; and
- At the project gate.

Written and verbal grievances will be received at the project's gate – therefore the security personnel have to be aware and trained to deal with the grievance appropriately. The security personnel should communicate that a stakeholder wants to submit a grievance to the person responsible to receive grievances (e.g. Project Company Community Liaison Officer). For illiterate complainants or those that prefer to submit their grievances

verbally, the person responsible to receive grievances will meet them and will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the grievance have been captured.

6.2.4 Link between MASEN and Project Company, EPC and O&M grievances mechanism

A committee included MASEN, the Project Company, the EPC (during construction phase) and O&M company (during operation phase) will be set and will meet every 30 days to review complaints. Depending on the subject of the complaint, it will be handled by the recipient concerned: either MASEN, Project Company or the EPC.

The responsibility for grievances treatment according the subject are :

- Grievance for land acquisition or use will be treated by MASEN.
- Grievance for job application will be treated by MASEN
- Grievance for a potential risk related to the project implantation will be treated by MASEN
- Grievance for work conditions will be treated by Project Company and EPC

6.2.5 Receiving Grievance

MASEN and Project Company will commit to a certain time frame in which all recorded grievances will be responded and to ensure that this response time frame is enforced. This [treatment process and response duration](#) is 30 days. By letting people know when they can expect to be contacted by company personnel and/or receive a response to their grievance their frustration may be reduced.

6.2.6 Reviewing and Investigating Grievances

To ensure that all grievances are adequately investigated and closed out, a grievance log will be kept, documenting all the actions taken to address each grievance.

An extensive investigation may be required when grievances are complex and cannot be resolved quickly. MASEN and Project Company will take full responsibility for investigating the details of grievances coming through its grievance mechanism, following the principle of “no cost to communities”. Involving second parties during the investigation of grievances (i.e.the Project Company, the EPC or subcontractors) when required is recommended.

In cases of sensitive grievances - such as those involving multiple interests and a large number of affected people - it may help to engage outside organizations in a joint investigation, or allow for participation of local authorities, only if the complainants agree to this approach.

For complex grievances an investigation team will have to be appointed. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget.

Meetings with complainants and site visits can be useful for grievance investigation and will be undertaken, as appropriate.

6.2.7 Grievance Resolution Options and Responses

One of the potential advantages of a grievance mechanism is its flexibility. Rather than prescribe a specific procedure for each particular type of grievance, a list of possible options appropriate for different types of grievances are available. Options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction noise), providing an apology, replacing lost property, providing monetary compensation, revising the community’s engagement strategy, and renegotiating existing commitments or policies.

The grievance investigation team will provide a proposal to resolve the grievance, which will have the backing of the Management. The person appointed by MASEN and Project Company will then contact the complainant to get an agreement on the proposed solution.

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

Close-up monitoring of a grievance will be undertaken, if possible, by collecting proof that the necessary actions have taken place. For example:

- If the issue was resolved with the satisfaction of the complainants, get a confirmation and file it along with the case documentation;
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how these were resolved.

If a complainant doesn't receive an answer from his employee within a period of 3 months, he may send his grievance to MASEN (through box on site or email).

6.2.8 Grievances registered

All grievances will be registered with the following information :

- Date of reception
- Grievance subject
- Responsibility for the treatment
- Response done
- Closing date for the grievance.

MASEN keeps the registers.

7. Monitoring and evaluation

7.1 Process Monitoring and Reporting

The following indicators will be monitored.

Table 3: Key monitoring indicators

Indicator	Source of information	Frequency Construction & Decommissioning/Operation
Number of grievances closed out	Grievance System Management	Quarterly / bi-yearly
Number of grievances still opened	Grievance System Management	Quarterly / bi-yearly
Topics raised in grievances and trends	Grievance System Management	Quarterly / bi-yearly

Grievances mechanism activities will be reported in the Quarterly Environment Progress Report. [Grievances](#) will also be reported to IFIs during supervision missions

7.2 Compliance Auditing

The Project Company will procure the services of an independent external compliance auditor to check compliance with the applicable environmental and social standards, including the commitments made in the SEP.

The scope of the audits will include the following items related to the SEP:

- Inspect the grievances and close out reports;
- Inspect the key monitoring indicators and reports;

These external audits will be undertaken quarterly during construction and decommissioning, and quarterly during the first year of operation, bi-yearly in the second year of operation and yearly thereafter.