

Version	Date	Short Description
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1 Purpose

1.1 Purpose

This Specific Procedure (SP) has been developed for Magil Construction Corporation (Magil) to guide stakeholder engagement activities for Phase 2 of the upgrade of NR3 for the Eastern Entrance of Douala, including from the Boko-Tradex exchange (PK9 + 925) up to the foot of the Dibamba River bridge (PK18 + 825), herein referred to as the 'Project'.

1.2 Objectives

The overarching objective of this 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 Project in achieving and maintaining a social license to operate. The specific objectives for the SEP are summarised in Table 1.1. below.

Table 1.1 Objectives of the Douala Eastern Entrance Stakeholder Engagement Plan

Objective	Rationale
Identify all stakeholders relevant to the Project	Involving as many stakeholders as possible will facilitate inclusive communication and capture a wide range of issues and concerns.
Distribute accurate project information in an open and transparent manner	Ensuring that stakeholders, particularly those directly affected or who perceive themselves to be affected by the proposed development, have information at their disposal with which to make informed comments. Information should allow affected parties to develop an informed understanding of potential impacts, risks and benefits.
Form partnerships to promote constructive interaction between all parties	Developing relationships of trust between the developer and stakeholders will contribute to proactive interactions and avoid, where possible, unnecessary conflicts based on rumour and misinformation.
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.
Manage stakeholders' expectations	Ensuring that stakeholder expectations are kept at realistic levels (e.g. around job opportunities; provision of local infrastructure; social development; disruption and resettlement) limiting 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 and international requirements consultation	Ensuring regulatory compliance can avoid potential Project delays based on procedural issues rather than substantive ones.

2 Application

This SEP applies to all Magil departments, employees and contractors, involved in the planning and implementation of the Project. Further detail on the activities comprising project planning and implementation are set out below.

3 Clarifications/Definitions

Community: A group of interacting people with common interests and values who are directly affected by the company's activities, generally inhabiting or with land connections in a project's immediate or surrounding areas.

Consultation: Providing information or advice on, and seeking responses to, an actual or proposed event, activity or process.

Engagement: Beyond consultation, the active exchange of information, the active listening to concerns and suggestions and the active consideration of ways to mutually accommodate these, including potential responsive changes to design and operational parameters.

Grievance: Notice in any form or medium from a community member, group or institution that they have suffered detriment, impairment or loss as a result of an unplanned, unannounced or not consented activity of the business.

Project Affected Person (PAP): Any person who, as a result of the implementation of the project loses the right to own, use or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land) annual or perennial crops and trees or any other moveable asset either in full or in part, permanently or temporarily.

Responsible for Relations (RR): Individual assigned responsibility of identifying, engaging and maintaining mutually respectful relations between the Project and local stakeholders. Equivalent of a community liaison officer.

Stakeholder Influence: The power a stakeholder has to facilitate or impede Project activities.

Stakeholder Interest: The perceived level of interest that each stakeholder has in Project activities.

Stakeholder: A person who has an interest in a particular decision or activity, either as an individual or as a representative of a group. This includes people who influence a decision, or can influence it, or those affected by it.

4 Responsibilities

Stakeholder engagement is a core aspect of risk management for the Project and should be managed through clear roles and responsibilities. Table 4.1 defines the main roles whose accountabilities and responsibilities include stakeholder engagement. The resourcing, roles and responsibilities with regard to stakeholder engagement will vary in accordance with Project milestones and will be subject to review following any significant changes.

Table 4.1 Roles and responsibilities for stakeholder engagement

Title	Comments
Ministry of Public Works (MINTP)	<ul style="list-style-type: none">• Provide the needed information to complete the assignment• Ensure that stakeholder engagement carried out by Magil and its sub-contractors on behalf of MINTP during Project construction is

Title	Comments
	<p>done in a manner that does not create long-term liabilities or legacy issues.</p> <ul style="list-style-type: none"> • Where complex matters related to significant stakeholder engagement and grievance-related issues arise (i.e. that could stop the Project), MINTP shall be consulted and provide support, guidance, or consent as required. • Responsible for stakeholder engagement and grievance management during operation.
Magil Country Director	<ul style="list-style-type: none"> • Ensuring sufficient financial and human resources are made available for undertaking activities in line with the SEP.
Magil Project Director	<ul style="list-style-type: none"> • Overall accountability for stakeholder engagement being carried out in line with the SEP and reporting of key issues (e.g. Level 3 grievances) related to stakeholders to Country Director. • Where necessary, request additional financial or personnel support from corporate head office. • <i>Engagement hierarchy</i>: Carrying out stakeholder engagement with national-level and government bodies. • <i>Grievance hierarchy</i>: Investigating, signing off and delegating actions to resolve critical/serious (Level 3) grievances when they arise. • Engage with and consult local authorities and regulatory agencies at national or regional level to report on: progress, planned activities, anticipated changes, and to receive feedback. • Accountable for the management and resolution of Project-related grievances, with oversight of their status and timelines for resolution and sign-off.

Title	Comments
Magil HSEQSR Manager / Coordinator	<p>Reports to the Project Director and is responsible for:</p> <ul style="list-style-type: none"> • Oversight of implementation of the SEP and reporting of key issues related to stakeholders to Project Director. • Regular progress meetings with the RR to keep abreast of social performance issues and agree on management approach. • Signing off key decisions related to stakeholder engagement. • Monitor overall progress of stakeholder engagement process and planned activities. • Provision of training and support to the RR on SEP requirements. • <i>Engagement hierarchy</i>: Carrying out stakeholder engagement with regulatory bodies and municipal authorities. • <i>Grievance hierarchy</i>: Investigating, signing off and delegating actions to resolve Level 2 grievances when they arise. • Responsible for the day-to-day management of the Project grievance mechanism, with delegation of responsibilities and actions to the <i>Responsible for Relations</i>.
Magil Responsible for Relations (RR)	<ul style="list-style-type: none"> • <i>Engagement hierarchy</i>: Carrying out stakeholder engagement at the local level, such as local residents, businesses, traditional leaders, public services and road users. • Maintain open channels of communication between the Project and its stakeholders. • Proactively build effective and trusting relationships with local/street-level stakeholders through regular visits and communication regarding the project. • Plan and organise the stakeholder engagement activities, ensuring the participation of women and vulnerable groups. • Maintain the stakeholder engagement records/logs in line with the SEP. • Escalate stakeholder relations issues to the HSEQSR Manager where needed. • Maintain the stakeholder list/database for the Project. <p>The <i>Responsible for Relations</i> will also take on grievance management duties for the Project as follows:</p> <ul style="list-style-type: none"> • Dissemination of information regarding the grievance management process (including communication channels) to ensure it is understood by stakeholders. • Receive verbal or written complaints, record them in Ethics Channel (online Grievance Log).

Title	Comments
	<ul style="list-style-type: none"> • Provide verbal and/or written feedback and notifications to complainant(s) regarding the progress with resolving their grievance within 30 days. • Where relevant, forward the grievance reports to the applicable subcontractor for assessment and resolution. • Liaise with the Project team (including any applicable subcontractors) to ensure that corrective actions that are assigned to them are completed within the agreed time frame and record completed actions in the Grievance Log. • Liaise with the aggrieved person to verify if the corrective action has been implemented. • Update and report to HSEQSR Manager regarding grievances logged and actions taken.
Employees / Sub contractors	<ul style="list-style-type: none"> • Are aware of contents of the SEP and act in alignment with it. • Responsible for aligning behaviours with SEP, so as to support positive company-community relations. • Reporting any feedback or complaints received to the RR. • Do not communicate with stakeholders about Project-related matters unless authorised to do so by HSEQSR Manager with prior approval of key messages.
Consultant (3 rd party)	<ul style="list-style-type: none"> • Informed of the contents and requirements of the SEP in relation to the consultant's role. • Should interface and engagement with stakeholders and communities be required, this will be done with prior approval from the HSEQSR Manager who will authorise key messages/talking points in advance.
Magil and Subcontractor Supervisors / Line Managers	<ul style="list-style-type: none"> • Ensure direct reports are aware of contents of the SEP and act in alignment with it.

5 Description

5.1 About the Project

Douala is one of the two most populated cities in Cameroon and is a critical commercial hub, with more than half of Cameroon's economic activity and industrial production occurring here. The National Road 3 (NR3), running from the Autonomous Port of Douala through Douala to the interior of the country is a vitally important road within Cameroon as it links Cameroon and neighbouring countries with the Atlantic Ocean at the Autonomous Port of Douala. Specifically, as economic activity and the extent of the city of Doula have expanded the NR3 has become an: important transit route between the port, local industrial areas and the interior; an entrance to the city of Douala; and an urban boulevard. Over the past two decades the volume of traffic using and crossing the NR3 has grown significantly

and there is substantial unregulated use and occupation of the roadsides. It is evident that current accesses through Douala are undersized, resulting in traffic congestion and inefficiencies. This has resulted in both regional transportation and intercity traffic being regularly disrupted. It is therefore important that the connection between the Port Autonome and the exit of the Douala be optimised for through traffic, while making provision for the mobility requirements of local users.

The upgrade of the NR3 has formed part of the Cameroonian Ministry of Public Works' planning for many decades, with the Right of Way (RoW) for the road having been declared by decree No. 84/048 in 1984. Various studies have informed the planning and design of the NR3 from the centre of Douala to the Dibamba River bridge resulting in the rehabilitation project titled the "Eastern Entrance of Douala". The first phase of this rehabilitation project, from the centre of Douala (PK0) up to the Boko-Tradex exchange (PK9 + 925), was completed and commissioned previously.

The Ministry of Public Works (MINTP) appointed the Magil Construction Corporation (Magil) in December 2019 to undertake construction of the phase 2 of the Eastern Entrance of Douala, including from the Boko-Tradex exchange (PK9 + 925) up to the foot of the Dibamba River bridge (PK18 + 825).

The redevelopment of the NR3 has formed part of the Cameroonian Ministry of Public Works' planning for many decades, with the right-of-way (RoW) for the NR3 having been declared by decree No. 84/048 in 1984. Various studies were conducted and have informed the planning and design of the NR3 from the centre of Douala to the Dibamba River bridge. These have included:

- 2008: Preliminary studies having retained the functional scenario;
- 2010: Summary Preliminary Project leading to the scenario; and
- 2011: Detailed Preliminary Project, presenting the Douala East Entrance solution.

These studies resulted in the NR3 rehabilitation project titled the "Eastern Entrance of Douala". The project aims are to:

- decongest the NR3 road course, in order to allow the crossing of the city without traffic jams;
- to considerably improve the functioning of the hydraulic flows and the quality of sanitation in the area;
- facilitate trade between neighbourhoods intersecting the NR3;
- encourage the movement of persons and goods, promoting urban mobility, etc. in complete safety;
- improving access to markets, ports and industrial areas;
- to enable the populations living along the road course and all the inhabitants of Douala to see their living and transport conditions change and thus improve their living environment;

- meet the needs of accessibility on days of sporting events at the Japoma stadium in Douala;
- improve road safety by providing pedestrian crossing areas and adequate parking.

The scope of the project includes widening and reconfiguration of nine kilometres of the NR3 over, the development of five interchanges, nine hydraulic structures and related urban infrastructure.

As such this SEP covers stakeholder engagement activities for Douala Eastern Entrance works. Stakeholder engagement activities will be proportional to the nature and type of works being carried out at the time, to ensure a balanced approach. This includes engagement with internal Magil stakeholders such as employees and sub-contractors, in addition to external stakeholders such as regulatory bodies, local authorities and directly impacted communities.

5.2 Scope

This Stakeholder Engagement Plan (SEP) is developed to guide the stakeholder engagement and consultation process for the Project. Magil will support the stakeholder engagement on this Project, including ensuring the actions, words and behaviours of employees and sub-contractors are aligned with the SEP and best practice.

In conducting stakeholder engagement, other applicable environmental and social management plans and requirements will also be taken into account.

A Stakeholder Engagement Plan that is well understood and implemented will ensure the following:

- Provide a practical framework for engaging with stakeholders throughout the duration of the Project;
- Create a greater awareness of the Project's strategic intent amongst its stakeholder audience;
- Ensure two-way communication between the developer and stakeholder groups through effective communication methods;
- Ensure that Project decisions are informed by stakeholder views, such that conflict is avoided wherever possible, or effectively addressed should it arise; and
- Provide an effective mechanism for reporting and managing grievances and other stakeholder feedback;
- Align expectations between the Project and its stakeholders;
- Minimise financial and reputational risks; and
- Improve stakeholder satisfaction.

The SEP is a live document to be updated as the Project evolves, in accordance with key milestones and learnings, to ensure full stakeholder participation in Project decision-making.

5.3 Principles and Stakeholder Engagement Guidance

The SEP was developed with consideration to the following national and international standards and procedures.

Act No. 96 / 12 of August 5, 1996

At the national level, the implementation of environmental and social impact studies (ESIA) finds its legal basis in Law no. 96/12 of August 5, 1996 on the framework law on environmental management. This Law, in its article 17, provides that " The promoter or Client of any development, equipment or installation project which, because of its size, nature or the impact of the activities carried out therein on the natural environment, risks damaging the environment is required to carry out, according to the specifications, an impact study to assess the direct or indirect effects of the said project on the ecological balance of the site or any other region, the environment and quality of life of the populations and the impact on the environment in general."

This law also sets out the fundamental principles that should guide the rational management of the environment and natural resources in Cameroon. Those are:

- The precautionary principle, according to which lack of certainty, taking into account current scientific and technical knowledge, should not delay the adoption of effective and proportionate measures to prevent a risk of serious and irreversible damage to the environment at an economically acceptable cost;
- The principle of preventive and corrective action, giving priority to action at the source of environmental damage, using the best available techniques at an economically acceptable cost;
- The polluter pays principle, according to which the costs resulting from measures to prevent, reduce and control pollution and to restore polluted sites should be borne by the polluter;
- The principle of responsibility, according to which any person who, by his action, creates conditions likely to harm human health and the environment, is obliged to ensure, or to cause to be ensured, the elimination of such conditions in such a way as to avoid such effects;
- The principle of participation and key to this SEP according to which:
 - each citizen must have access to information on the environment, including information on hazardous substances and activities well as on the measures taken to prevent or compensate for these effects.
 - every citizen has a duty to ensure the protection of the environment and to contribute to the protection of the environment;
 - public and private persons must, in all their activities, comply with the same requirements;
- Decisions on the environment must be taken after consultation with the sectors of activity or groups concerned or after public debate where they are of general scope.

Article 72 of the Act set out the mechanism for public participation in environmental management.

5.3.1 International Standards

The approach to consultation detailed in this SEP has been prepared in line with international standards, including the International Finance Corporation (IFC) Performance Standards (IFC PS) and the World Bank's Safeguard Standards.

The IFC PS 1 requires that there is regular engagement throughout the life of the Project, as described in Box 5.1 below.

Box 5.1 Performance Standards Requirements for Stakeholder Engagement

Principles

- Provide affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allow the client to consider and respond to them;
- Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
- Stakeholder engagement should 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 - Where the project has potentially significant adverse impacts on affected communities, an "*informed consultation and participation*" (ICP) process should take place. ICP is an organised and iterative consultation that involves a more in-depth exchange of views and information including "*free, prior and informed consent*.";
- Stakeholder engagement should be inclusive of all the relevant groups within the community (including the vulnerable and marginalised), focused on those directly affected as opposed to those not directly affected, be free of external manipulation, interference, coercion, or intimidation; and
- Stakeholder engagement should be documented and include opinions and concerns as well as the measures taken to respond to them, i.e., the actions taken by the project to avoid or minimise risks to, and adverse impacts on, the affected communities.

Requirements

Information disclosure is a key requirement of stakeholder engagement. Key messages and information that should be provided during engagement include:

- 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; and
- A grievance mechanism by which community concerns are received, answered and addressed in a timely manner.

Further to the requirements for stakeholder engagement outlined in PS1, the additional standards that contain requirements for stakeholder consultation and participation and have been considered in developing this SEP include PS 2, 4, 5, 6 and 8 (see Box 5.2). The development and implementation of a Grievance Mechanism is also referenced within PS 1, 2, 4 and 5.

Box 5.2 Performance Standards Requirements for Stakeholder Engagement

Standard	Key Components
Performance Standard 2: Labour and Working Conditions	<ul style="list-style-type: none"> • Recognises that the pursuit of economic growth through employment creation and income generation should be balanced with the protection of basic rights for workers. • Acknowledges that constructive worker-management relationship and safe and healthy working conditions may enhance the efficiency and productivity of operations.
Performance Standard 4: Community Health, Safety & Security	<ul style="list-style-type: none"> • Recognises that project activities, equipment and infrastructure bring benefits to communities including employment, services and opportunities for economic development. However, the project can also increase the potential for community exposure to risks from development. • Where project activities pose risks of adverse impacts on the health and safety of affected communities the developer is required to make available relevant information (including the details of an Action Plan), in an appropriate form, to affected parties and government authorities so that they can fully understand the nature and extent of the risks.
Performance Standard 5: Land Acquisition and Involuntary Resettlement (including physical and economic displacement)	<ul style="list-style-type: none"> • In such instances the developer will undertake extensive consultation and negotiation with affected parties. Such communication will include transparent access to project related information in a timely fashion to enable people to plan for the future. Here public participation will include the establishment of appropriate representative forums through which resettlement and compensation are discussed. Most of this consultation is part of the SIA and Resettlement Action Plan (RAP) but it should be recognised as a component of the SEP. • Although resettlement is always seen as a last resort, this Standard recognises that involuntary resettlement occurs as a result of projects and refers to both physical and economic displacement as a result of project related land acquisition. Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition that result in their displacement. • Consultation shall also take place with host communities.
Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management	<ul style="list-style-type: none"> • Recognises that protecting and conserving biodiversity in all its forms is fundamental to sustainable development. • Where the project has potential impacts on legally protected or critical habitats consultation with relevant authorities, specialists and communities must be undertaken.

Performance Standard 8: Cultural Heritage	<ul style="list-style-type: none"> • Recognises the importance of cultural heritage for current and future generations and is consistent with the convention concerning the protection of the world’s cultural and natural heritage. • Where sites of cultural heritage are potentially impacted by the project the developer will consult with local communities as well as relevant national authorities responsible for the maintenance of such sites.
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5.4 Stakeholder Identification and Prioritisation

5.4.1 Overview

The identification and mapping of stakeholders¹ enables the Project to structure stakeholder engagement to ensure that a representative and diverse range of views and concerns are considered in the Project’s development. Stakeholder identification and mapping is an ongoing process that requires regular review and update. Its purpose is to establish:

- Which organisations, groups and individuals have the potential to be directly or indirectly affected, both positively or negatively, by the Project; and
- The degree to which they can influence and have an impact upon the Project.

5.4.2 Stakeholder Identification

Table 5.1 lists the stakeholders identified to date, their interest in the Project and frequency with which they are to be engaged at the present stage. This table should be updated by the Responsible for Relations (RR) function on a risk appropriate basis as the Project progresses or as circumstances and stakeholder groups change.

¹ IFC (2004) *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets* defined stakeholders as “persons or groups 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, the academic community, or other businesses.”

Table 5.1 Stakeholder Groups

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
<i>Regulatory and Service Institutions</i>				
The Ministry of the Environment, Nature Protection and Sustainable Development (MINEPDED), Douala	<p>Seek to create assurance that the Project will comply with and exceed contractual and legal compliance standards, following Cameroon legal and International best practice</p> <p>Obtain and maintain formal licence to operate</p> <p>Maintain a positive and ongoing relationship</p>	Ongoing or as required	<p>Face to face meetings</p> <p>Focus groups with environmental and social specialists and regulatory institutions around specific issues</p> <p>Project specific Information Sessions</p>	<p>Country Director / Project Director</p> <p>HSEQSR Manager / Coordinator</p> <p>Responsible for Relations with Community (RR)</p>
Ministry of Public Works (MINTP)	Receive updates on the construction and provisions of the ESMP	Weekly, Ongoing or as required	<p>Face to face meetings</p> <p>Telephonic meetings</p>	HSEQSR Manager / Coordinator
Power Distribution Services- Douala	Consultation prior to any power disruption activity	As required	<p>Face to face meeting</p> <p>Formal letter / written notification</p>	HSEQSR Manager / Coordinator
Douala Water Services	Consultation prior to any water diversion activity	As required	<p>Face to face meeting</p> <p>Formal letter / written notification</p>	HSEQSR Manager / Coordinator
Hysacam (hygiene and sanitation company)	Consultation prior to any activity that may have a service delivery impact	As required	Face to face meeting	HSEQSR Manager / Coordinator
Douala Town Planning	Maintain a positive and ongoing relationship	As required	<p>Face to face meeting</p> <p>Formal letter / written notification</p>	HSEQSR Manager / Coordinator

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
Public Services, including Hospital, Schools and Sports Stadium	Maintain a positive and ongoing relationship	As required	Face to face meeting Formal letter / written notification	HSEQSR Manager / Coordinator
Douala Road Traffic Authorities	Consultation prior to any road disruption or diversion activity	As required	Face to face meeting Formal letter / written notification	HSEQSR Manager / Coordinator
<i>Municipal / Local Authorities</i>				
Office of the Mayor – Douala Municipality Sub prefecture - Douala <i>[Additional stakeholders to be added as required]</i>	Obtain and maintain formal licence to operate Maintain a positive and ongoing relationship Important communication channel and 'voice piece' for disseminating information about the Project (progress, schedule, activities, health and safety) to the wider community	Ongoing or as required	Focus group meetings Media releases and media liaison activities Participatory workshops	HSEQSR Manager / Coordinator Responsible Relations (RR)
<i>Traditional Authorities</i>				
Bwang Bakoko Traditional Council and Administration; Yassa Traditional Council and Administration; Ngodi Bakoko Traditional Council and Administration; Japoma Traditional Council and Administration;	Build a trustful relationship, manage expectations and seek to ensure a sound understanding of various project processes Important communication channel and 'voice piece' for disseminating information about the Project (progress, schedule, activities, health and safety) to the wider community	Ongoing or as required	<ul style="list-style-type: none"> • Face to face meetings • Focus groups • Notices • Communication boards • Grievance procedures • Pamphlets with project information • Special workshops or events with the community such as sport events • Project site visits for members/leaders of communities 	HSEQSR Manager Responsible Relations (RR) ESIA consultants

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
<i>Private Organisations/Associations, Utilities and Civil Society Organisations</i>				
Civil Society - CAM-ECO (Cameroon Ecology A.D.E.C (Association of Children of Charity); Civil Society- ACEH (Association for Cooperation and Assistance between Men "Action for the Development of Families"); Civil Society- ACTION FOR ALL (Action for All in Cameroon); Civil Society- A.D.E.C (Association of Children of Charity; Civil Society -ACEH (Association for Cooperation and Mutual Aid between Men "Action for the Development of Poor Families")):	Obtain and maintain social licence to operate and build and maintain trustful relationships	Ongoing or as required	<ul style="list-style-type: none"> • Focus group meetings • Media releases and media liaison activities • Participatory workshops 	HSEQSR Manager / Coordinator Responsible Relations
International NGOs – The World Natural Union (IUCN); The Global Witness; The International Centre for the Promotion of Creation (CPIC); The African Institute for Economic and Social Development	Obtain and maintain social licence to operate and build and maintain trustful relationships	Ongoing or as required	<ul style="list-style-type: none"> • Focus group meetings • Media releases and media liaison activities • Participatory workshops 	HSEQSR Manager / Coordinator Responsible Relations
Mobile Network Companies	Ensure a sound understanding various project activities that have the potential to impact on mobile network infrastructure	Ongoing or as required	<ul style="list-style-type: none"> • Telephonic engagements • Email correspondence 	HSEQSR Manager / Coordinator Administrative and Finance Manager

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
Formal business interests in project area of influence	Obtain and maintain social licence to operate and build and maintain trustful relationships	Ongoing or as required	<ul style="list-style-type: none"> Focus group meetings Media releases and media liaison activities Participatory workshops 	HSEQSR Manager / Coordinator Responsible Relations
Local Traders	Obtain and maintain social licence to operate and build and maintain trustful relationships	Ongoing or as required	<ul style="list-style-type: none"> Focus group meetings Media releases and media liaison activities Participatory workshops 	HSEQSR Manager / Coordinator Responsible Relations
Public Services				
<i>[Additional stakeholders to be added as required]</i>				
Community-based Organisations				
<i>[Additional stakeholders to be added as required]</i>				
Media				
Newspapers	Seek to obtain and maintain social licence to operate	Quarterly or as required	Media releases and media liaison activities (e.g. press events, photo opportunities)	Administrative and Finance Manager
Radio	Build and maintain a trustful relationship			
Television	Seek to ensure that the public develops a sound understanding of the various processes relevant to the Project (engagement activities, construction, etc) Broadcast key messages about project activities			
Project Affected Persons				

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
Persons temporarily or permanently displaced (economically and/or physically)	<p>Ensure a sound understanding of resettlement and/or compensation processes</p> <p>Create awareness around formal processes through which stakeholders can contact Magil to prevent individuals from controlling or influencing the engagement process at the local level</p>	Ongoing or as required	<p>Face to face meetings</p> <p>Focus groups</p> <p>Notices</p> <p>Communication boards</p> <p>Grievance procedures</p> <p>Pamphlets with project information</p> <p>Special workshops or events with the community such as sport events</p> <p>Project site visits for members/leaders of communities</p>	<p>HSEQSR Manager / Coordinator</p> <p>Responsible Relations</p> <p>ESIA consultants</p>
<p>Local businesses.</p> <p>Roadside Artisans</p> <p>Road users - pedestrians</p> <p>Road users - drivers</p>	<p>Ensure a sound understanding of various project processes (engagement activities, construction activities)</p> <p>Create awareness around formal processes through which stakeholders can contact the Project to prevent individuals from controlling or influencing the engagement process at the local level</p>	Ongoing or as required	<p>Face to face meetings</p> <p>Focus groups</p> <p>Notices</p> <p>Communication boards</p> <p>Grievance procedures</p> <p>Pamphlets with project information</p>	<p>HSEQSR Manager / Coordinator</p> <p>Responsible Relations</p> <p>ESIA consultants</p>
<i>[Additional stakeholders to be added as required]</i>				
Others				
Employees		Ongoing or as required	Face to face meetings	

Stakeholder/group	Objective of engagement	Frequency of engagement	Engagement Methods/ Communication Channels	Responsibility
Labour/Workers' union	Understand needs around capacity building and where Magil may be able to assist		Grievance procedures	Administrative and finance manager
Contractors	Build a trustful relationship and manage expectations in relation to training, employment opportunities, social and economic benefits etc			Responsible Relations Human Resource Manager
<i>[Additional stakeholders to be added as required]</i>				

5.5 Stakeholder Mapping

Prioritisation of stakeholders determining the level and frequency of consultation with each group is based on the level of impact experienced and/or their interest in the Project. Stakeholder groups have been divided into three categories:

Key stakeholders: Stakeholders who have a high level of interest in the Project, particularly regarding approvals/consent, e.g. Ministry of Public Works, Ministry of the Environment, Nature Protection and Sustainable Development, and those who are likely to experience direct impacts e.g., local shops, businesses and road users, including vulnerable groups.

Potentially active stakeholders: Stakeholders who are likely to voice their opinions and/or concerns about the project and who may experience indirect impacts. These stakeholders require information updates about the project and some consultation. We may also require some information from them to feed into various project aspects.

Other interested parties: Stakeholders that are likely to voice their opinions and/or concerns but unlikely to experience any impacts from the project. These stakeholders require some level of information regarding the project.

5.5.1 Influence/Interest Results

Those stakeholders plotted into the high interest / high impact/influence quadrant in particular could represent either a strategic threat or opportunity to the Project and will require particular consideration during engagement.

It is critical to note in addition that stakeholders positioned elsewhere on the map, for example those with lower impact/influence but still with a high interest in the Project, may also need to be considered, as they may represent either a source of vocal challenge to the Project or a potential partner.

5.6 Reporting

This section outlines reporting requirements related to stakeholder engagement.

5.6.1 Internal Reporting

It is important to establish a routine approach to internal reporting on engagement activities and outcomes, including associated risks. A standard set of reporting templates should be utilised in the preparation of weekly and monthly reports to management on stakeholder issues and grievance management (see Section 5.9).

Below is a table providing examples of internal reporting frequency and content requirements.

Table 5.2 Internal Reporting

Report	Recipient	Frequency	Content
Project Director	Magil Corporate Sustainability Function	Monthly	<p>Highlights of key engagements activities, undertaken</p> <p>Summary of key issues, grievances, requests and risks arising</p> <p>Priority issues/grievances for resolution and central sign off</p> <p>The report should be framed around the high level objectives of engagement, key risks and opportunities identified, and measures taken or proposed to address them</p>
HSEQSR Manager / Coordinator	Country Director / Project Director	Monthly	<p>Summary of external stakeholder engagement with communities and other local stakeholder groups including:</p> <ul style="list-style-type: none"> • An assessment of high level risks and opportunities, and actions undertaken or proposed • Progress against the indicators/outputs in the SEP • Stakeholder issues and grievances raised / requests made • Summary of next steps and corrective actions, including changes to the SEP
Responsible Relations	HSEQSR Manager / Coordinator	Weekly	<ul style="list-style-type: none"> • Highlights of engagement activities undertaken • Summary of number and type of stakeholder issues raised, and grievances / requests made • Summary of immediate responses given, or commitments made to grievance resolution • Key stakeholder issues or risks arising for priority resolution • Proposed next steps and actions, including any corrective actions or changes to the SEP

Report	Recipient	Frequency	Content
Grievance Management Officer (as part of Responsible Relations role)	Responsible Relations	Weekly	<i>Grievance management</i> <ul style="list-style-type: none"> • Grievance management activities undertaken and documented • Summary of number and type of grievances received and logged • Summary of immediate responses given, or commitments made • Key grievances/ risks arising for priority resolution
Employees Contractors Consultant (3 rd party) Supervisors / Line Manager	Responsible Relations Grievance Management Officer (if not the RR) Local Compliance Officer or Ethics Point	As required	<ul style="list-style-type: none"> • Any community engagement (planned activities or unplanned interactions) undertaken and documented • Summary of number and type of stakeholder issues or grievances raised / requests made, • Summary of immediate responses given or commitments made • Key risks arising for priority resolution

5.7 Stakeholder Engagement Process

5.7.1 Engagement Overview

Table 5.3 depicts the various engagements that have been carried out to date at Project planning and preparation stages and sets out future engagement activities to be undertaken during Project implementation.

Table 5.3 Engagement activities undertaken and planned

Project Stage	Engagement Activity	Status
<i>Planning / Prior to Financial Close</i>		
Stage 1: Compensation and DUP Process	Compensation and Resettlement Plan (Plan d'Indemnisation et de Réinstallation (PIR)) was drawn up at the request of financiers by MINTP , to serve as a reference framework for managing the expropriations necessary to acquire the rights-of-way requested as a result of settlement of the populations within the right-of-way of the necessary works.	Completed April/May 2011
Stage 2: Compensation payment	The overall cost of implementing the PIR was estimated at TWO BILLIONS FIVE HUNDRED MILLION CFA and apparently paid out.	Completed July 2011
Stage 3: Preparation and ESIA Development. Broad-based information sharing with communities and other interested and affected parties (e.g. radio, leaflet)	Initial consultations with local authorities and traditional authorities. Including; <ul style="list-style-type: none"> • Circulation of a draft Environmental Impact Statement prepared; • Technical review of the draft Environmental Impact; and 	Completed from 2013
Stage 4: ESIA Update Report 2020 (APAVE)	Consulting with respect to update on EIA report with local authorities and traditional leaders (21 August 2020 at Jacoma village) and 9 December 2020.	Completed August – December 2020
<i>Revised ESIA Disclosure</i>		
Stage 5: Revised ESIA (SLR) Disclosure	The final stage of engagement will support the public release of the ESIA report for public review and comment. The engagement will be supported by a Background Information Document that provides detail on the Project and key provisions of the ESIA report. The document will be made available to the public and an executive summary in the local language will be developed.	Planned Q1 2021

<i>Implementation</i>		
<p>Stage 7: Project Implementation</p> <p>Continual engagement between the Project / Responsible Relations and stakeholders, directly related to operational aspects</p>	<p>Ongoing information dissemination and consultation with Project stakeholders during ESMP implementation. Areas for engagement may include, but not be limited to:</p> <ul style="list-style-type: none"> • Project update: activities, schedule, progress, changes; • Disclosure of the Project grievance mechanism; • Local employment opportunities and recruitment process; • Discussion of E&S impacts of relevance at the time, such as community health, safety and security, emergency response etc. 	<p>Planned Q1 2021 – end of construction</p>

5.8 Project-Specific Considerations

The following is a set of Project-specific considerations to be taken into account when planning stakeholder engagement and consultation.

- **Gender balance and inclusion:** In projects that impact marginal groupings (as informal traders would be here) it has been found that women are at times under-represented at general communal consultative and engagement meetings. The Project shall ensure that women are able to participate in the stakeholder engagement and consultation processes to voice concerns or provide feedback. Future stakeholder engagement and consultation meetings shall stipulate in advance that women are to be encouraged to attend. Where necessary, such as during resettlement planning surveys and consultation, separate sessions may be held with female Project-affected Persons (PAPs) and stakeholders, such as female-only FGDs. This will not only ensure women's views are considered in the resettlement and compensation process, it will also ensure they have a private/safe forum in which to discuss gender-sensitive issues. Separate meetings may also be held with women's groups or designated female leaders. Provision of advance notice of meetings and other engagement activities will help to ensure that women are present for them (see point below).
- **Seek feedback on approach:** During its periodic meetings with regulatory agencies, customary leaders (if applicable) and District/Municipal/Traditional Authorities the Project will seek feedback about its approach to engagement. This is to ensure that information is being received across the communities and specifically by vulnerable groups, as well as to ensure that they are able to provide feedback to the Project. Where feedback received indicates a need, the Project shall adapt the way it engages with these stakeholder groups in order to ensure accessibility, inclusion and 2-way communication channels.

5.8.1 Planning

Planning of stakeholder engagement activities is a key means to achieving the desired outcome, ensuring opportunities aren't missed and avoiding over-engagement. Planning will consider the following:

- Key messages that the project wishes to convey (integrated for the different engagement stages/topics);
- Any materials needed (meeting attendance form, camera, visual materials such as maps, diagrams and pictures, information leaflet, projector, laptop, PowerPoint slide pack, poster, refreshments);
- The team members responsible for doing the engagement - as a general rule, a team member should never carry out engagement meetings alone, they should go in pairs),
- Sequencing of stakeholders to be engaged on a specific issue – start with the most 'senior' stakeholder group to respect authority and traditional hierarchy, and then engage more widely;

- Matching/corresponding stakeholder hierarchy – stakeholders should be engaged by Project personnel of the equivalent level of seniority;
- Timing of meetings – ensure that enough time is allowed for and between meetings to account for any delays (e.g. intense debates, traffic) and that the meeting is held at a time that is convenient for the stakeholder (e.g. avoid late/out of hours meetings. As such, stakeholders shall be informed of, and invited to, attend and participate in meetings and other engagements related to the Project at least 4 working days in advance;
- Prepare for the most likely questions from stakeholders, e.g. by drafting a set of standard questions and answers to be followed;
- Consider whether it is appropriate to take food, drink or a customary gift to the meeting (observing business integrity and compliance rules); and
- Consider what sign-off is needed before disclosing key information on the Project.

5.9 Grievance and Feedback Mechanism

The Grievance and Feedback Mechanism will enable stakeholders to make a complaint or a suggestion regarding the way the Project is being managed. Grievances may take the form of specific complaints for damages/injury, concerns about project activities, perceived incidents or impacts or requests for more information / clarity.

External grievances and feedback from stakeholders will be managed as per below.

5.9.1 Dissemination of information about the grievance process

The grievance process is to be actively communicated to Project stakeholders so that they;

- are aware of the process and have the opportunity to provide feedback on it,
- know that they have the right to submit a grievance or provide feedback to the team,
- understand how the mechanism will work, and
- how their grievance will be addressed.

This process is carried out through community meetings, informal discussions and information displayed in public places.

5.9.2 Responsibility for the grievance management

The responsibility for grievance reporting and management is for the nominated Magil Grievance Officer/RR.

5.9.3 Reporting of a grievance

Complaints can be submitted verbally to the RR, however where a stakeholder wishes to report a grievance anonymously, or through an intermediary, and not directly to the RR, the following additional grievance reporting options are also available to the complainant:

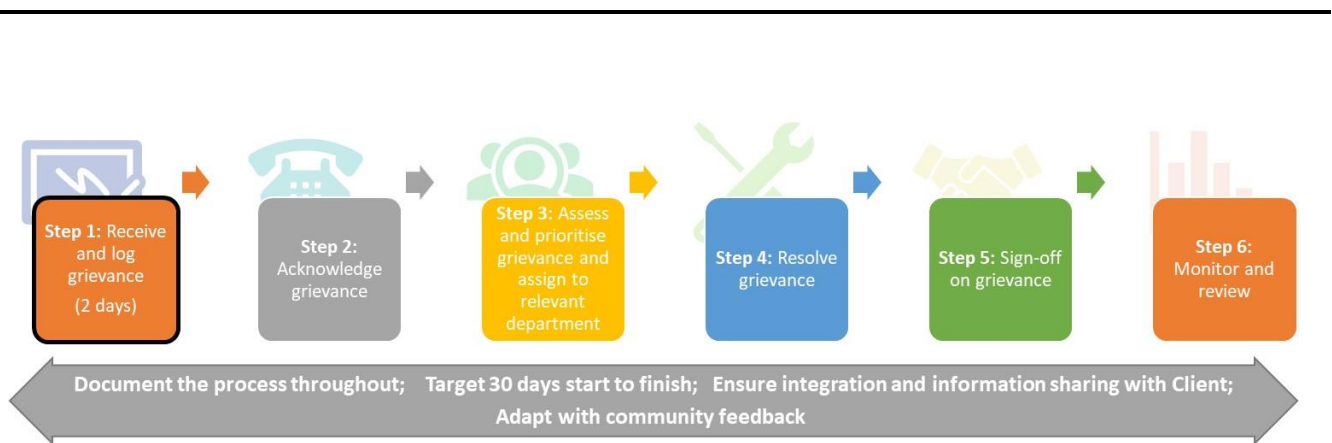
- Communicating the grievance through a local leader or authority, or
- Submitting a letter or form at a Participation Box point in the locality. Participation Boxes and Forms will be placed at accessible yet discrete locations in the locality of the road works and information about how they can be used will be provided through engagement.

Magil confidentiality procedures will be in place to protect the complainant.

5.9.4 The Grievance Management Process

5.9.4.1 General Project Grievances

The grievance process is staged per Error! Reference source not found..



5.10 Competence, Training and Awareness

Any team member whose role entails interaction with external stakeholders needs to have the competency and ability to build and nurture positive company-community relations based on trust and mutual cooperation. This section briefly outlines what the key competencies are and how they can be developed.

5.10.1 Competencies

Key competencies for anyone whose role entails interaction with external stakeholders on a regular basis are listed below. Note that this does not only apply to the RR as there are instances when other team members will also need to carry out engagement.

- Good communication and listening skills;
- From the local area, fluent in the local language (specific for the RR);
- Gender-sensitive;
- Able to provide answers to questions from stakeholders in a manner that aligns with the project' standard messaging;
- Able to acknowledge that they may not always be able to respond to a question and seek advice before doing so;
- Not making promises that can't be kept;
- Good understanding of community/cultural dynamics specific to the area;
- Open-mindedness and respect for the views of others;
- Proactive mind-set and good problem-solving skills;
- High level of integrity and trustworthiness; and
- Understanding of Magil's business integrity and anti-corruption standards.

5.10.2 Training

Training elements to support the development of these key competencies in stakeholder and community engagement should include:

- Developing and maintaining a stakeholder list (or database) and map;
- Maintaining the grievance mechanism including receipt, categorisation and response to issues raised. HSEQSR Managers/Coordinators and Responsible for Relations are required to undertake a specific training module (*Training: Community Grievance Management*);
- Developing and maintaining detailed engagement plans with weekly/monthly events;
- Running a stakeholder meeting, including consistent messaging;
- Maintaining documentation (e.g. minutes of meetings, stakeholder plan, grievance records).

The Project should also assess capacity to deliver on the stakeholder engagement plan and address gaps through formal training for key staff.

Box 5.3 provides an indicative overview of some of primary skills needs across generic staff categories.

Box 5.3 Skills Required for Stakeholder Engagement Activities

Country Director / Project Director

- Country socio economic and political knowledge
- Leadership skills;
- Conflict management;
- Cross cultural communication (awareness of cultural sensitivities);
- National legislation knowledge; and
- Monitoring and evaluation.

HSEQSR Manager / Coordinator

- Knowledge of procedures and technical aspects;
- Management skills;
- Knowledge of governmental and non -governmental systems;
- Monitoring and evaluation; and
- Knowledge and sensitivity of local culture.

Responsible Relations / Supervisors / Line Manager

- Engagement and communication skills;
- Knowledge of national legislation;
- Knowledge of local social and cultural contexts and sensitivities;
- Inter-personal skills; and
- Monitoring and evaluation.

Employees and Contractors

- National legislation knowledge; and
- Communication skills including knowledge of the local culture including local language.

5.11 Record Management and Monitoring

All engagement activities throughout the life of the Project have to be documented and organised to allow for tracking of delivery of commitments made to stakeholders, progress of pending grievances and to have the ability to refer to past records when required. The principle of 'if it isn't documented, it never happened' is applied with respect to stakeholder records that relate to the Project.

Stakeholder engagement records are used and are maintained by the team in hard copy and also scanned records. These documents will be reviewed and audited in accordance with the schedule in Table 5.4.

Table 5.4 Monitoring of Stakeholder Engagement Performance

Record Type	Purpose	Frequency of Inspection/Audit
Stakeholder/Community record form (see Annex A)	<ul style="list-style-type: none"> • Used to record the full minutes of a meeting and record stakeholder attendance (either with their signature or their thumb print). • It is filled in with the details on information presented, audience questions, the team’s responses, commitments made and actions resulting from the meeting, when appropriate. • To be filed and collated in the stakeholder database. 	Quarterly
Stakeholder engagement log (see Annex B)	<ul style="list-style-type: none"> • Used to store and compile information about meetings, events and other Project-related interactions with stakeholders throughout the life of the project. • It is populated with the details on information presented, audience questions, the Owners responses, commitments made and actions resulting from the meeting, when appropriate. • The database is used to track the frequency of meetings over the life of the project, as well as the completion of any commitments made. • It can be reviewed to analyse trends and report on stakeholder engagement activities overall, including meetings and requests. 	Quarterly

Record Type	Purpose	Frequency of Inspection/Audit
Stakeholder List (see Annex C)	<p>A list that brings together details of all the Project's stakeholders, including the frequency with which they should be engaged and the 'relationship manager' for each stakeholder.</p> <p>It is necessary to conduct on-going updates to the stakeholder list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.</p>	Quarterly
Stakeholder Map (see Section 5.5)	<p>Using the Stakeholders List, it is a useful exercise to map out stakeholders by their interest in and impact on the Project (see Section 5.5) to prioritise engagement activities.</p>	<ul style="list-style-type: none"> • Annually, and • Whenever there is a material change impacting the project/stakeholders
Participation Box Form, Grievance Control Form and Ethics Channel data outputs (see Annex D)	<ul style="list-style-type: none"> • The forms are used to record and compile information about a specific grievance received, as a basis for further assessment and defining the response to it. The information in a Participation Box Form is then entered in the Ethics Channel system so that all complaints are centralised. • The Ethics Channel enables escalation of grievances to the correct owner and tracking grievances to ensure they are satisfactorily closed out. • Ethics Channel combined statistics about all external complaints received can be used to identify patterns, avoid recurrent problems and improve the company's overall environmental and social performance. 	Monthly

Templates for the records listed in *Table 5.4* are provided in *Annex A -D*.

5.12 Revision of the SEP

The SEP will be reviewed, updated and document-controlled:

- Annually;
- At the transition from one milestone/stage to another; and
- Following any significant changes in terms of activity, risk profile or incident.

Revisions will be recorded in the '*Review*' and '*Short Description*' table at the beginning of the document.

6 Records

The following records will be maintained with respect to the implementation of the SEP:

- Community/Stakeholder Record Form (Refer to Annex A)
- Stakeholder Engagement Log (Refer to Annex B)
- Stakeholder List / Database (Refer to Annex C)
- Grievance Control Form (Refer to Annex D)
- Grievance Mechanism.

7 References

7.1 IMSM

7.2 IFC Performance Standards

7.3 WB/IFC EHS General Guidelines

7.4 Project ESIA

8 Attachments

Annex A: Community/Stakeholder Record Form

Annex B: Stakeholder Engagement Log

Annex C: Stakeholder List / Database

Annex D: Grievance Control Form

Annex E: Communication Methods Applicable to the SEP

Annex B: Stakeholder Engagement Log

Date:								
Meeting Details					Participants			
No	Record Type	Date	Time	Location	Client	Magil	Key Stakeholder	Other Attendees
1								
2								
3								
4								
5								
6								
7								
8								
Meeting/Issue Summary					Actions	Responsible Person	Due Date	Status

Annex C: Stakeholder List / Database

Stakeholder Details					Contact Details			Stakeholder Management	
No	Name	Position	Organisation	Location	Phone	Email	Address	Relationship Manager	Engagement Frequency
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									

Annex D: Grievance Form

GRIEVANCE REDRESS FORM

Section 1: Overview Information

Sub Activity Code		Prefecture	
Sub Activity Name		Ward	

Grievant Information

Name		Reference Number	
Age		Phone	
Gender		Other Contact Details	

Date of Grievance:

Received by.....Name.....Position

Nature of Grievance

Section 2: Tier 1 Resolution: YES/NO.

If NO then recommendation in terms of escalation.....

Nature of Resolution

If Resolved: Date of Resolution.....

Grievant Signature	Magil Rep Signature
Grievant Name	Magil Rep Name

Tier 2: Escalation summary

Relevant additional comments

Tier 2 Resolution: YES/NO.

If NO then recommendation in terms of escalation.....

Nature of Resolution

If Resolved: Date of Resolution.....

Grievant Signature	Magil Rep Signature
--------------------	---------------------

Grievant Name	Magil Rep Name
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Section 3: Sign off for Monitoring:

Acknowledgment that Complainant informed (y/N)	Date Complainant Notified.....	Additional Actions Required (Specify).....
Describe how action taken were effective in resolving Complaint.....		
Approved by		Date

Annex E: Communication Methods Applicable to the SEP

A variety of communication methods are used to engage with specific groups, reflecting their level of authority, socio-economic context, cultural, educational and literacy factors. Communication methods will also vary with the objective and the stage of project-related engagement. Both formal and informal channels of communication will be used to disseminate information, engage and consult.

Table E-1 provides an overview of communication methods and engagement tools that can be used for engaging and consulting stakeholders. Stakeholders such as vulnerable groups may need to be consulted to determine the most appropriate communication and engagement method/tool them.

Table E-1 Communication methods and tools – per stakeholder group

Tool and Description	Purpose	Min of Public Works	Regulatory institutions	Municipal / Local authorities	Traditional leaders	Utility agencies	Public services	Community-based organisations	Media	Project Affected Persons
Meeting - one-on-one, small/restricted group	Discuss specific or sensitive topics; engage officials/authorities; specific target group/individual; initial meetings to build rapport; people get to know Magil team personally	X	X	X	X	X	X	X	X	X
Meeting - large group, mixed representation	Broad-based information sharing and engagement; reaching a wide audience in person; people get to know Magil team							X		X
Phone call	Reactive and time-sensitive communication such as acknowledging or responding to a complaint or grievance; communicate with someone with whom a relationship is well established	X	X	X	X					X (after establishing rapport)
Leaflet / Flyer	Reach a wide non-specific audience; provide general information/overview and contact details; allows stakeholder to take information home.									X
Poster	Announce the date, time and venue of meetings; reach a wide non-specific audience; provide general information and contact details									X
Radio	Short radio slot to broadcast basic project information, details of meetings and contact details; reach a wide audience; local dissemination of information; highly accessible as does not require literacy								X	X

Tool and Description	Purpose	Min of Public Works	Regulatory institutions	Municipal / Local authorities	Traditional leaders	Utility agencies	Public services	Community-based organisations	Media	Project Affected Persons
Newspaper advert	Short newspaper article to share basic information about the project, details of meetings and contact details; reach a wide audience; permanent record							X	X	X
Letter	Formal communication with the authorities, project proponent, regulator; acknowledge or respond to a complaint/grievance	X	X	X	X	X	X	X	X	X
Project questions and answers guide	An internal tool for supporting team members to engage with external stakeholders with consistent messages to refer to.	X	X	X	X	X	X	X	X	X