

MPATAMANGA HYDRO POWER PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

MAY 2024

Mpatamanga Project Stakeholder Engagement Plan (MP-SEP)		Revision:	Draft	5
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Document number	MHPP001-MP-SEP-001	Originators	Jennifer Grant Morten Johnsen	
		Reviewers	Bryson Msiska Prisca Kutengule Olivier Flambard Charlotte Bisley Beatrice Pemba Victor Kasuzweni Margaret Sikwese	
Project	MHPP001 – Mpatamanga Hydro Power Project	Approver		
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ABBREVIATIONS AND ACRONYMS

Acronym	Term
ADC	Area Development Committees
BAP	Biodiversity Action Plan
BMEP	Biodiversity Monitoring and Evaluation Plan
CBO	Community-Based Organisations
CEP	Community Engagement Program
CIA	Cumulative Impact Assessment
CLO	Community Liaison Officer
CES	Community Engagement Strategy
CV	Curriculum Vitae
DC	District Council
DoL	Department of Lands
E&S	Environmental and Social
ECW	Early Civil Works
EDF	Electricité de France
EGENCO	Electricity Generation Company (Malawi) Limited
EMA	Environmental Management Act
EP4	Equator Principles
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESF	Environmental and Social Framework
ESGT	Environment and Social Government Team
ESH	Environmental, Safety, and Health
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESMU	Environmental and Social Management Unit
ESS	Environmental and Social Safeguards (ESS)

Acronym	Term
ESSP	Energy Sector Support Project
FBO	Faith-based Organisations
FC	Financial Close
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GoM	Government of Malawi
GRM	Grievance Redress Mechanism
GVH	Group Village Head
GVGRC	Group Village Grievance Redress Committee
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
HSSE	Health Safety Security and Environment
ICP	Informed Consultation and Participation
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IFI	International Financing Institution
ILO	International Labor Organisation
IHA	International Hydropower Association
ILO	International Labor Organisation
ISO	International Standard Organisation
JDA	Joint Development Agreement
KPI	Key Performance Indicator
LTA	Lenders Technical Advisor
MDAs	Ministries, Departments and Agencies
MHPP	Mpatamanga Hydro Power Project
MoE	Ministry of Energy
MP-GRM	Mpatamanga Project Grievance Redress Mechanism
MoC	Management of Change
MW	Mega Watt
NC	Nonconformity
NGO	Non-Governmental Organisation
OHS	Occupational Health and Safety
PAOI	Project Area of Influence

Acronym	Term
PAPs	Project Affected Person/s
PDC	Project Development Committee
PIU	Project Implementation Unit
PoE-ESM	Panel of Experts for Environmental and Social Management
PPA	Project Preparatory Assistance
PS	Performance Standard
RA	Relationship Agreement
RLRAP	Resettlement and Livelihood Restoration Action Plan
RPF	Resettlement Policy Framework
RWG	Resettlement Working Group
SEP	Stakeholder Engagement Plan
SHEA	Sexual Harassment, Exploitation and Abuse
SIA	Social Impact Assessment
SLO	Social License to Operate
SOP	Standard Operating Procedure
STI	Sexually Transmitted Infection
TA	Traditional Authority
The Project	Mpatamanga Hydro Power Project
UN	United Nations
UNESCO	UN Educational, Scientific, and Cultural Organisation
UNGP	UN Guiding Principles on Business and Human Rights
VDC	Village Development Committee
VH	Village Head
WB	World Bank
WBG	World Bank Group

1. About the Mpatamanga Hydro Power Project (MHPP)

1.1. MHPP Location, Infrastructure, and Planned Generation Capacity

The Mpatamanga Hydro Power Project (MHPP) is planned to have a generation capacity of 361 megawatts (MW) and comprise two hydropower plants: A 309 MW peaking plant at a main dam and a 52 MW baseload downstream plant at a regulating dam located about seven kilometres downstream of the main dam.

The MHPP is planned to be in the Southern Region of Malawi, within the Blantyre and Neno Districts, on the lower Shire River, approximately 50 kilometres (kms) from the city of Blantyre. It is planned to be situated between the existing Tedzani and Kapichira hydropower schemes.

Two transmission lines will be installed to deliver electricity generated through the MHPP to the Malawian national grid. These are: i) a 64 kms long 400 kilovolt (kV) transmission line (TL) from the main powerhouse to the existing Phombeya sub-station in Balaka District; and ii) an 11.4 kms long 132 kV TL from the regulating dam powerhouse to the existing Tedzani-Kapichira TL.

Other Project infrastructure will be developed. Studies are underway related to: transportation and transmission line routes; infrastructure selection; quarry locations; construction & operator camps.

The MHPP is planned to double the installed capacity of hydropower in Malawi thereby reducing power shortages and improving power supply security and providing opportunities for increased renewable energy generation capacity.

Figure 1 over the page shows the planned MHPP location.

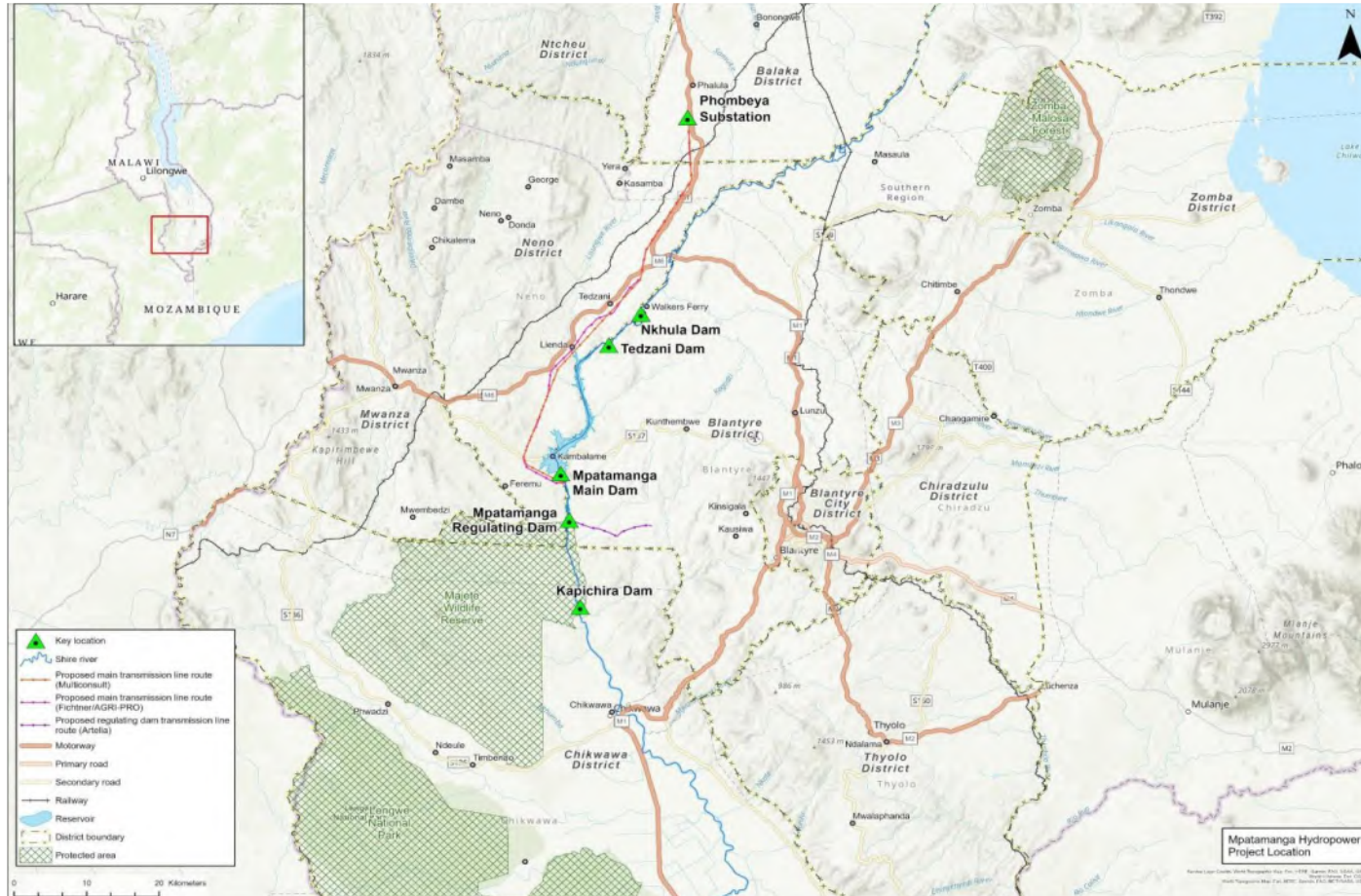


Figure 1: Planned Location of Mpatamanga Hydro Power Project (MHPP)

1.2. Potential Project Impacts (Positive and Adverse)

The MHPP Environmental and Social Impact Assessment (ESIA) is under development and therefore the list of potential environmental and social impacts listed below is preliminary. These will be assessed as part of the Project ESIA and prevention, management and mitigation measures will be identified and implemented to prevent, reduce and/or compensate for any Project-related impacts.

1.2.1. Potential Environmental Impacts

- Disturbances to terrestrial biodiversity.
- Disturbances to aquatic biodiversity.
- Soil disturbances, pollution, and erosion.
- Environmental pollution: Water; air; dust; noise and/or light pollution.

1.2.2. Potential Social Impacts

- Community safety risk due to flooding or accidental drowning.
- Increase in vector-borne diseases, especially malaria.
- Increase in road safety risks.
- Physical and/or economic displacement.
- Loss of access to natural resources and/or ecosystem services.
- Loss or disruption of livelihoods.
- Land use changes and land shortages.
- Human rights breaches.
- Population influx and associated impacts:
 - Changes in social and cultural practices, values, and social identity.
 - Increases in “social ills”, including, excessive consumption of alcohol and illegal substances and increase in sexual transactions.
 - Conflict between local communities and labour migrants and jobseekers.
 - Increases in Gender-Based Violence (GBV) and Sexual Harassment, Exploitation and Abuse (SHEA).
 - Increased pressure on social services and infrastructure, including potable water, medical facilities, education facilities, police services, and administrative services.
 - Increased incidence of communicable diseases, including HIV and Sexually Transmitted Infections (STIs), malaria, tuberculosis, Coronaviruses, and cholera.
- Damage, destruction, and/or desecration of graves, cemeteries, and/or sacred sites.
- Employment opportunities.
- Economic opportunities for local entrepreneurs and contractors.

1.3. Stage of Project Preparation

The MHPP is in the Development Phase, which commenced in late August 2022 (after a pre-development phase that commenced in 2015). During these phases, several technical, environmental & social (E&S) studies are being carried out to validate the Project's viability.

Key milestones of the Project's development to date are as follows:

- During 2015-2018: Technical investigations into project feasibility were undertaken.
- During 2018-2019: Initial environmental and social (E&S) studies were undertaken.
- In April 2019: The Ministry of Energy (MoE) signed a Joint Development Agreement (JDA) with the International Finance Corporation (IFC) to co-develop the Project. Further E&S and technical studies were then undertaken during 2019 - 2022. This included initiating studies related to development of a regulating dam; which plays a key role in mitigating Project environmental & social (E&S) impacts.
- In February 2020: The MoE launched a Strategic Sponsor tender process; seeking a private sector partner (a 'Strategic Sponsor') to enable the MHPP to be further developed through a Public Private Partnership (PPP).
- In August 2022: The MoE signed an agreement with the IFC and international hydropower developers¹ Electricité de France S.A. (EDF) and SCATEC to further develop the Project as a PPP.

Since late August 2022, the MHPP has been developed by four co-developers – the GoM, IFC, EDF, and SCATEC - through a PPP. Mpatamanga Hydro Power Limited (MHPL) now leads the Project's development, working in close coordination with the GoM. MHPL is a Blantyre-based Malawian company that was jointly formed by EDF and SCATEC in July 2022. In the future it is planned that both the GoM and the IFC will also become MHPL shareholders.

The World Bank is involved in the MHPP through its provision of a project preparatory assistance (PPA) grant to the GoM to support its involvement in the Project development. The GoM has established a Project Implementation Unit (PIU) based in Lilongwe that coordinates GoM Project involvement.

The MHPP is being developed in compliance with: national legislation; World Bank Group (WBG) environmental, social, labour, security, and occupational health and safety (ESHS) requirements including IFC Performance Standards (2012), World Bank Environmental and Social Framework (2017), and good international industry practice (GIIP).

Potential negative social and environmental impacts of the Project are being identified and studied, and environmental and social management plans (ESMPs) will be put in place to prevent and/ or mitigate these. There is a focus on ensuring that potential benefits of the Project are realised.

¹ EDF is a French multinational electric utility company. SCATEC is a Norwegian leading renewable power producer.

The MHPP will provide some local employment and procurement opportunities during the development, construction, and operational phases. It is also planned to include some initiatives and programs to benefit affected communities.

1.4. MHPP Governance

The four Project Partners have established a Project Development Committee (PDC) that meets monthly to discuss and monitor Project progress.

As Lead Developer, MHPL reports on the Project's progress to the PDC. MHPL's governance includes a Steering Committee comprised of EDF and SCATEC executive representatives and also a Board that operates in accordance with Malawian regulatory requirements.

GoM MHPP involvement is coordinated through its PIU, which is housed within the MoE. The PIU coordinates MHPP's interface with GoM Ministries Departments Agencies (MDAs) and includes representatives from key MDAs including Ministry of Lands (MoL) and Malawi Environment Protection Authority (MEPA). As needed, the PIU seeks technical guidance from the GoM MHPP Project Taskforce and policy guidance from the GoM MHPP Steering Committee. The two committees have been established by the MoE and operate under MoE management.

2. Introduction to the MHPP Stakeholder Engagement Plan (SEP)

2.1. Structure and Content

The MHPP SEP is structured as follows:

- **Section 2** introduces the SEP including its purpose, principles and objectives, scope.
- **Section 3** provides an overview of national legislation and international best practice standards that inform stakeholder engagement.
- **Section 4** summarises the mapping and analysis of the Project's key stakeholders.
- **Section 5** summarises the previous and ongoing engagement activities undertaken by the Project.
- **Section 6** summarises the Project's stakeholder engagement strategies including engagement methods, schedule, purpose and key messages. These include measures to ensure social inclusion.
- **Section 7** summarises the Project's approach to grievance management including a summary of the Project's Pilot Grievance Redress Mechanism (GRM) Procedure.
- **Section 8** summarises the MHPP's Environmental & Social (E&S) Organisation and the intended capacity building and training to support Project SEP implementation.
- **Section 9** describes the Project's stakeholder engagement management system.
- **Section 10** describes the process of monitoring and evaluating the performance of the Project SEP and summarises the monthly, quarterly, and annual reporting.

2.2. Purpose and Scope

The purpose of the MHPP SEP is to provide the Project with a framework for undertaking effective and meaningful engagement with stakeholders. The MHPP SEP will be a living document that will be applied throughout the duration of the Project and will be reviewed and updated on a regular basis (see section 10.3 Ongoing Review and Continuous Improvement) and also prior to the transition to a new major Project phase; e.g. from Development Phase to Construction Phase and then from Construction Phase to Operations Phase. The SEP will provide a mechanism for continuous engagement and dialogue with Project stakeholders. It will also allow for stakeholders' perspectives and concerns to be known and to regularly feed into the Project's phased development in an appropriate manner.

The engagement approach set out in the SEP takes into consideration cultural norms and values, the needs of vulnerable and disadvantaged groups, and is gender-sensitive and inclusive.

The SEP focuses on engagement with stakeholders affected by Project activities and those with interest in and influence on the project, including impacted communities, customary authorities responsible for these communities, regional and national government authorities and departments, large landowners (commercial farmers and tourism lodges), Non-Governmental Organisations (NGOs), including African Parks, civil society organisations, environmental and economic projects operating within the Shire River basin, local businesses and suppliers, and other hydropower dams in the area.

This SEP is the overall management plan addressing how MHPP will conduct regular consultations and interact with identified stakeholders. The MHPP SEP is aligned with the MHPP Environmental and Social Management System (ESMS) and the Environmental and Social Policy statements that serve as the framework within which all E&S Management Plans, including this SEP, will be developed. While the ESMS is an internal MHPL management system, the MHPP E&S policies that inform MHPP E&S management will be publicly available.

The following instances of stakeholder engagement are excluded from this SEP:

- Engagement with employees and labour unions, as such engagement is subject to different legislation and reporting requirements.
- Engagement with Project shareholders and corporate level stakeholders, as such engagement is undertaken by management.

In addition, there are likely to be instances where additional, targeted stakeholder engagement is required over and above the engagement methods and processes described in this SEP. For example, targeted stakeholder engagement plans will be developed for E&S studies and align with this SEP.

2.3. Principles and Objectives

This SEP is underpinned by internationally recognised stakeholder engagement principles², as follows:

- Stakeholder engagement is an integral part of all Project phases, including development, construction, and operation phases, and is ongoing and iterative. Stakeholder engagement should thus be initiated early to inform and receive input on studies and processes.
- It 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.
- Engagement should be inclusive and focused on those directly affected.
- It should be equitable and non-discriminatory and ensure that vulnerable individuals or groups amongst the affected stakeholders are given opportunities to voice their opinions and concerns.
- Engagement should be free of external manipulation, interference, coercion, or intimidation.
- Engagement should ensure the confidentiality of information and stakeholders, where appropriate, and should protect stakeholders from any retaliation for opinions expressed.
- It should enable meaningful participation, where applicable, but also avoid unnecessary and excessive consultations that may lead to stakeholder fatigue and/or unrealistic expectations.
- Engagement activities and their outcomes should be documented.

Considering these principles and the Project's overall engagement objectives, the specific objectives of this SEP are to:

- Ensure compliance with national regulatory and Good International Industry Practice in support of Social License to Operate (SLO) and maintain formal stakeholder engagement compliance throughout the Project cycle.
- Ensure the identification of all stakeholders who are (or will be) directly and indirectly impacted by Project activities and/or are other interested and influential stakeholders.
- Provide the framework for targeted stakeholder consultation and engagement, awareness-raising and other mechanisms for the inclusion and participation of stakeholders impacted by and / or interested in the Project.
- Reference the interface with the separate Grievance Redress Mechanism (GRM) Procedure that has been established to effectively manage stakeholder grievances through a fair and transparent process with a view to seeking resolution in a timely manner.
- Outline the reporting and monitoring activities that will be undertaken in relation to stakeholder engagement with various stakeholder groups and grievance management.

² International Finance Corporation (2012). Performance Standard 1.

3. Policy and Regulatory Framework

3.1. Policies and Regulatory Framework

The Project will be developed in compliance with all applicable national regulatory and lender requirements such as,

- Applicable national social and environmental laws, regulations and policies of Malawi relating to concessions, land acquisition and resettlement, labour and working conditions, gender equality act, Malawi Vision 2063, pollution prevention and control, public health and safety, biodiversity protection and conservation, ethnic groups and environmental protection.
- Relevant international treaties and conventions that Malawi has I and to which it is a signatory, such as (but not limited to) the United Nation (UN) Declarations, United Nations Educational, Scientific, and Cultural Organisation (UNESCO) conventions, International Labor Organisation (ILO) Core Conventions and all other ILO Conventions ratified by Malawi.
- International Financing Institution (IFI) standards including:
 - The IFC Performance Standards (2012);
 - World Bank Environmental and Social Framework (ESF) (2017);
 - Equator Principles 4 (EP4) (July 2020); and
 - Relevant World Bank Group (WBG) Environmental, Safety, and Health (ESH) Guidelines.
- The UN Guiding Principles on Business and Human Rights (UNGPs) (2011).

3.2. National Legislation

There are several national legal frameworks which govern public consultation in the implementation of development projects in Malawi. These legal frameworks include, but are not limited to, The Constitution of Malawi, Malawi Vision 2063, Gender Equality Act (2013) and the Environmental Management Act (EMA), 2017.

The Constitution of Malawi provides for right to access to information. Under the constitution every person has the right of access to all information held by the State or any of its organs at any level of Government in so far as such information is required for the exercise of his or her rights.

Malawi Vision 2063 Enabler 5: Human Capital Development promotes inclusiveness in human capital development by promoting gender transformative approaches that aim to reduce gender power imbalances which hinder the economic empowerment of women. It shall expand the provision of necessary social services and opportunities for minority and marginalized groups, including persons with disabilities, to participate in wealth creation activities.

The Gender Equality Act promotes gender equality, equal integration, influence, empowerment, dignity and opportunities, for men and women in all functions of society, to prohibit and provide

redress for sex discrimination, harmful practices and sexual harassment, to provide for public awareness on promotion of gender equality, and to provide for connected matters.

The EMA (2017) provides for public participation in Environment Management. Section 5(1) stipulates that for purposes of ensuring effective public participation and enforcement of rights and duties created under this Act, the Authority shall promote the right of every person to:

- Access environmental information - lead agencies, private sector and NGOs shall have a duty to provide such information in a timely manner.
- Participate in environmental decision-making processes directly or through representative bodies and mechanisms, for effective, direct, and indirect public participation.

The Malawi Guidelines for ESIA provide for the need to consult the public during Project implementation processes. The guidelines provide guidance on the methods of public consultation, communication, and information disclosure. The consultation with the public should:

- Be started as early as possible in the project cycle and be continued at some level throughout the project cycle.
- Time major elements of public consultation to coincide with direct planning and decision-making activities in the project cycle.

The guidelines allow for relevant public consultation to be undertaken at different stages of the ESIA process including during:

- Preparation of an ESIA terms of reference.
- Conducting ESIA studies.
- Government review of an ESIA Report.
- Preparation of environmental terms and conditions for approval.

3.3. International Standards and Guidelines

This SEP has been developed in alignment with the relevant IFC Performance Standards (2012), the World Bank Environmental and Social Framework (2017), and the UN Guiding Principles (2011).

3.3.1. IFC Performance Standards (2012)

The IFC views stakeholder engagement as the basis for building strong, constructive, and responsive relationships and an essential activity for the successful management of a project's E&S impacts. Engagement should be an ongoing process, tailored to be proportionate to the project's risks, adverse impacts and the project's phase of development. Performance Standard 1: Assessment and Management of E&S Risks and Impacts is relevant to the Project's approach to stakeholder engagement.

Apart from guiding the overall assessment and management of E&S risks, PS1 prescribes how grievances from affected communities and other stakeholders should be managed. It promotes ways

in which affected communities should be engaged throughout the project lifecycle to ensure that relevant information is disclosed and that affected communities/persons are heard and understood, and that their views are taken into account in project decisions through a process of Informed Consultation and Participation (ICP).

PS1 also provides guidance in dealing with vulnerable or disadvantaged groups in the Project's area of influence. Such vulnerability may stem from disadvantaged or vulnerable status that may stem from an individual's or group's age, gender, ethnicity, religion, political or other opinion, national or social origin, literacy, sickness, physical or mental disability, poverty, or economic disadvantage. If such groups are identified, it is necessary to determine if they are (or will be) disproportionately affected by the project. The consultation process must then be tailored to the needs of individuals or groups identified as disadvantaged or vulnerable.

3.3.2. World Bank Environmental and Social Framework (2017)

The World Bank Environmental and Social Standard 10 (ESS 10): Stakeholder Engagement and Information Disclosure notes that effective stakeholder engagement allows for the development of strong, responsive, and constructive relationships that can improve the environmental and social sustainability of projects, enhance project acceptance, and make a direct contribution to successful project design and implementation.

ESS 10 stipulates that open, transparent, and inclusive engagement between a project and its stakeholders is an essential element of good international practice. The engagement process must be conducted throughout the project life cycle and is most effective when started at an early stage of project development. Engaging stakeholders at an early stage helps to ensure that stakeholders are an integral part of early project decisions and identifying, managing, and monitoring a project's social and environmental impacts.

ESS 10 recommends a systematic stakeholder engagement approach whereby stakeholders are identified and categorized according to how they are affected by the project as well as their level of interest in and support for the project. This will inform the project's specific engagement strategies and information disclosure needs to different categories of stakeholders and enable stakeholders' views to be considered with regards to project management and social and environmental performance.

The ESS 10 also advises on information disclosure and meaningful consultation. In terms of appropriate project information on E&S risks and impacts, these must be disclosed in a timely, understandable, accessible, and appropriate manner and format. Consultation is meaningful when it is culturally appropriate, and free of manipulation, interference, coercion, discrimination, and intimidation.

Stakeholder engagement must be adapted to the needs of vulnerable and disadvantaged groups.

A key element of effective stakeholder engagement is the development and implementation of an accessible and inclusive grievance management procedure that allows stakeholders to raise Project-related issues and grievances and the project to respond to and manage such grievances.

3.3.3. UN Guiding Principles on Business and Human Rights (2011)

The UN Guiding Principles (UNGPs) provide further international guidance to the Project's stakeholder engagement effort, specifically the SEP's approach to grievance resolution through the following non-state-based grievance mechanism principles:

- **Principle 28:** States should consider ways to facilitate access to non-state-based grievance mechanisms dealing with business-related human rights harms. This refers to grievance mechanisms that are administered by a business enterprise and that are non-judicial to ensure speedy remediation.
- **Principle 29:** To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted. This implies that operational-level grievance mechanisms should be directly accessible by affected communities / stakeholders, i.e., stakeholders should be able to engage directly with the Company in dealing with issues and settling on remediation, whether such a complaint is related to an alleged human rights abuse or not; and
- **Principles 30 and 31:** Deal with grievance mechanisms and as such have been discussed in more detail in Section **Error! Reference source not found..**

The General Principles of the UNGPs stipulate special attention must be paid to rights, needs and challenges of individuals from groups that may become more vulnerable or marginalised due to Project activities.

4. Stakeholder Mapping and Analysis

To align with both the IFC Performance Standards (2012) and World Bank Environmental and Social Framework (2017), stakeholders have been defined as:

- Individuals or groups that are likely to be affected directly or indirectly by the Project i.e. 'Project-affected parties'; and
- Other Interested or Influential Stakeholders i.e. 'Other Interested Parties'.

The term "stakeholder" may refer to an individual, group or organisation.

Stakeholder mapping and analysis is the process used to categorise stakeholders and determine the engagement requirements for each stakeholder group. In general, those stakeholders requiring the greatest engagement effort are those who are most affected by and/or have the highest level of influence and/or have interest over a project.

As a first step in preparing this SEP, stakeholder mapping and analysis of Project stakeholders was undertaken in June 2023 by PIU and MHPL.

The objectives of the stakeholder mapping and analysis were, inter alia, to:

- Identify key stakeholders according to type and category.
- Assess stakeholders' level of interest in and/or impact by the Project as well as stakeholders' level of influence/power over the Project.
- Use the above assessment to prioritise stakeholders and engage with them accordingly.
- Assess opportunities for partnership and collaboration with stakeholders.
- Identify requirements for implementing the SEP, including staffing and capacity-building requirements.

4.1. Identification of Key Stakeholders

For the purposes of mapping and analysis, stakeholders that may be impacted by and/or who may have interest in and/or have influence over the Project were identified according to stakeholder type and category.

These categories included:

- Government ministries, departments, and agencies (MDAs) – national, regional or district.
- Traditional authorities (traditional authority, group village head, or village head).
- Resettlement impacted communities (physical and/or economic displacement) (villages and group villages).
- Directly and indirectly impacted communities (villages and group villages, inclusive of community groups such as those focused on natural resource management) and the potentially vulnerable e.g. youth, female-headed households, child-headed households (if identified within the Project area), elderly, persons with disability, chronically ill, low literacy levels etc Civil society Organisations, including NGOs and Community-Based Organisations (CBOs).
- Faith-based organisations (FBOs).
- Other hydropower projects in Project area.
- Public sector, Private sector and/or Public Private Partnership (PPP) entities or programmes in the Project area.
- Media.
- International lending institutions.

Stakeholders in these categories were identified through several processes, including review of past and current stakeholder activities, the . of the Project Area of Influence (PAOI) as described in section

4.3 and confirmation of directly and indirectly impacted communities within this Area, desktop review and suggestions from stakeholders.

Going forward under the SEP, the abovementioned groups will continue to be engaged and additional groups, where required, will be identified, and included in engagement activities.

4.2. Regarding Vulnerable Groups

During SEP implementation, specific attention will be paid to identifying any disadvantaged or vulnerable individuals or groups, who, because of their particular circumstances, may be disadvantaged or vulnerable³. These individuals or groups are likely to be more and/or differently affected by Project-induced impacts and changes and may thus have different concerns and priorities about project impacts, mitigation mechanisms, and benefits, and who may require different, or separate, forms of engagement.

The individuals and/or groups identified as vulnerable include Project-affected community members who are elderly, are female headed households, child headed households, persons with chronic illness, persons with disabilities, have low literacy levels. The socio-economic vulnerabilities of directly and indirectly affected individuals and/or groups will be verified and/or expanded during the E&S studies as well as community engagement activities. This information will be used to refine the Project SEP identification, approach, and outreach to vulnerable individuals and groups.

As described in Section 6.1, the Community Engagement Strategy (CES) includes forms of engagement that are accessible to vulnerable individuals and/or groups. For example, regular mobile community liaison in Project-affected villages that supports outreach to community members not able to travel to the regularly scheduled community meetings. Potentially also use of Group Village Grievance Redress Committees (GVGRCs) to share key Project information.

4.3. Relevance of Project Area of Influence (PAOI)

In developing the initial MHPP SEP, the Project Area of Influence played a key role in determining the approach to engaging with Project stakeholders. The final definition of the PAOI will be an outcome of the various environmental and social studies underway during 2023 however, to enable a structured approach to stakeholder engagement and communication in the interim, a temporary PAOI has been defined. This is defined as the proposed Project facilities footprint *plus* one kilometre (1 km) perimeter.

³ Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon which they depend.

Figure 1 shows the temporary PAOI that informs the Project SEP. The highlighted Group Villages (GVH) are the GVHs within which Project facilities will be located.

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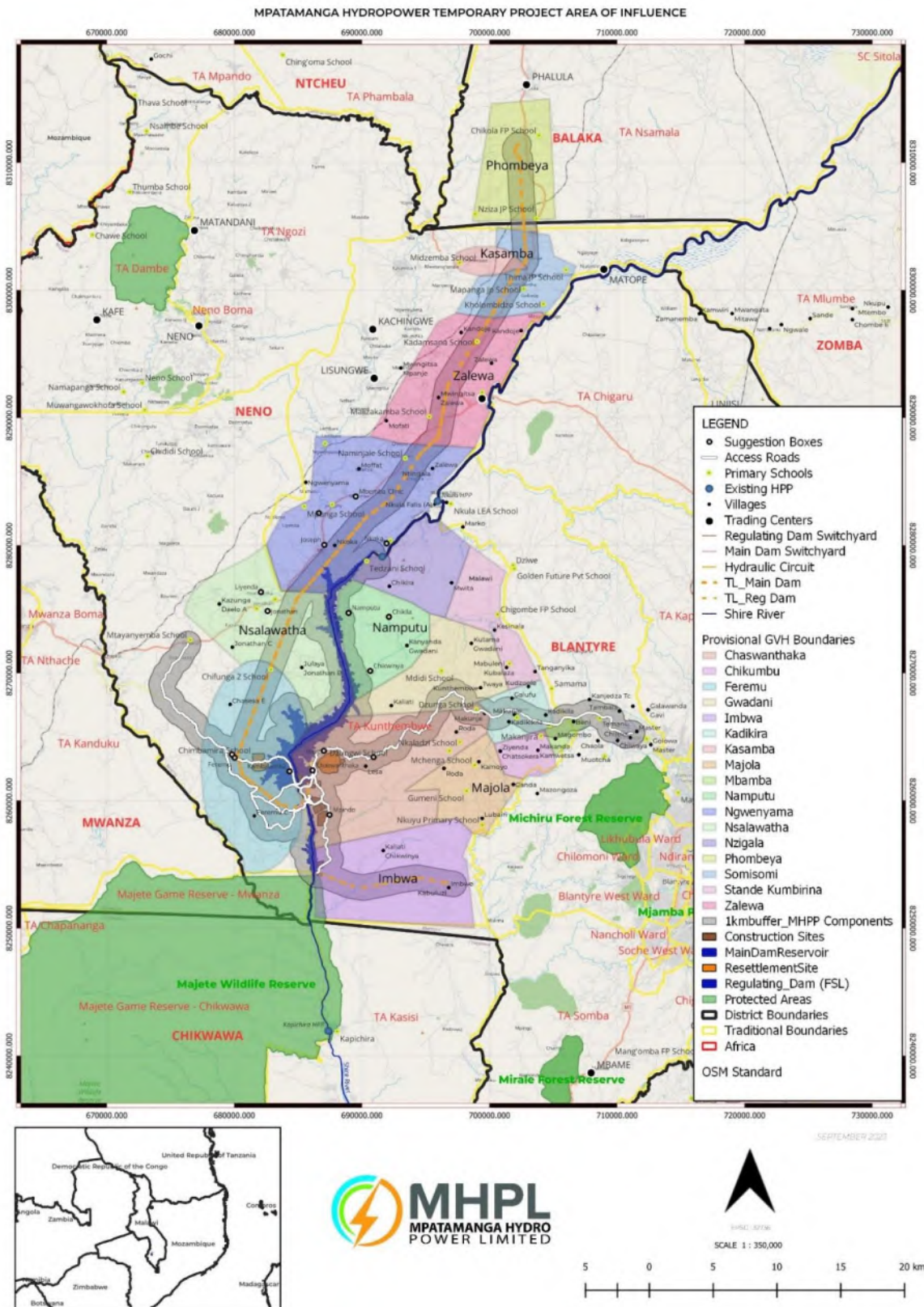


Figure 1: Mpatamanga Hydro Power Project: Preliminary PAOI

4.3.1. Categorisation of Project Stakeholders within SEP PAOI

The Project's stakeholders have been categorised in relation to their proximity to the PAOI and the nature of the Project's impacts on them. This has been done to ensure that the most directly impacted stakeholders are prioritised during engagement and consultation activities.

The following criteria have been used to categorise and prioritise stakeholders:

- Likelihood of being physically and/or economically displaced.
- Likelihood of experiencing social and/or environmental impacts due to proximity to Project facilities or components.
- Likelihood of having an interest in or influence on the Project due to being located within the administrative units - regions, districts, and Traditional Authority (TA) areas – that fall within the PAOI while not being directly impacted by Project social and/or environmental impacts.

Based on the above criteria, four stakeholder categories have been defined:

- **Category 4 – General Public:**

Stakeholders that may have an influence on or interest in the Project but who are located in Regions, Districts, and Traditional Authorities (TAs) outside the PAOI; defined as Other Interested Parties in alignment with IFC Performance Standards (2012) and World Bank Environmental and Social Framework (ESF) (2017).

- **Category 3 – Host Administrative Areas:**

Regions, Districts and Traditional Authorities (TAs) within the PAOI but indirectly impacted or only minimally impacted by the Project (includes government, individuals, businesses, civil society organisations, and indirectly impacted communities)

- **Category 2 - Directly Impacted Communities:**

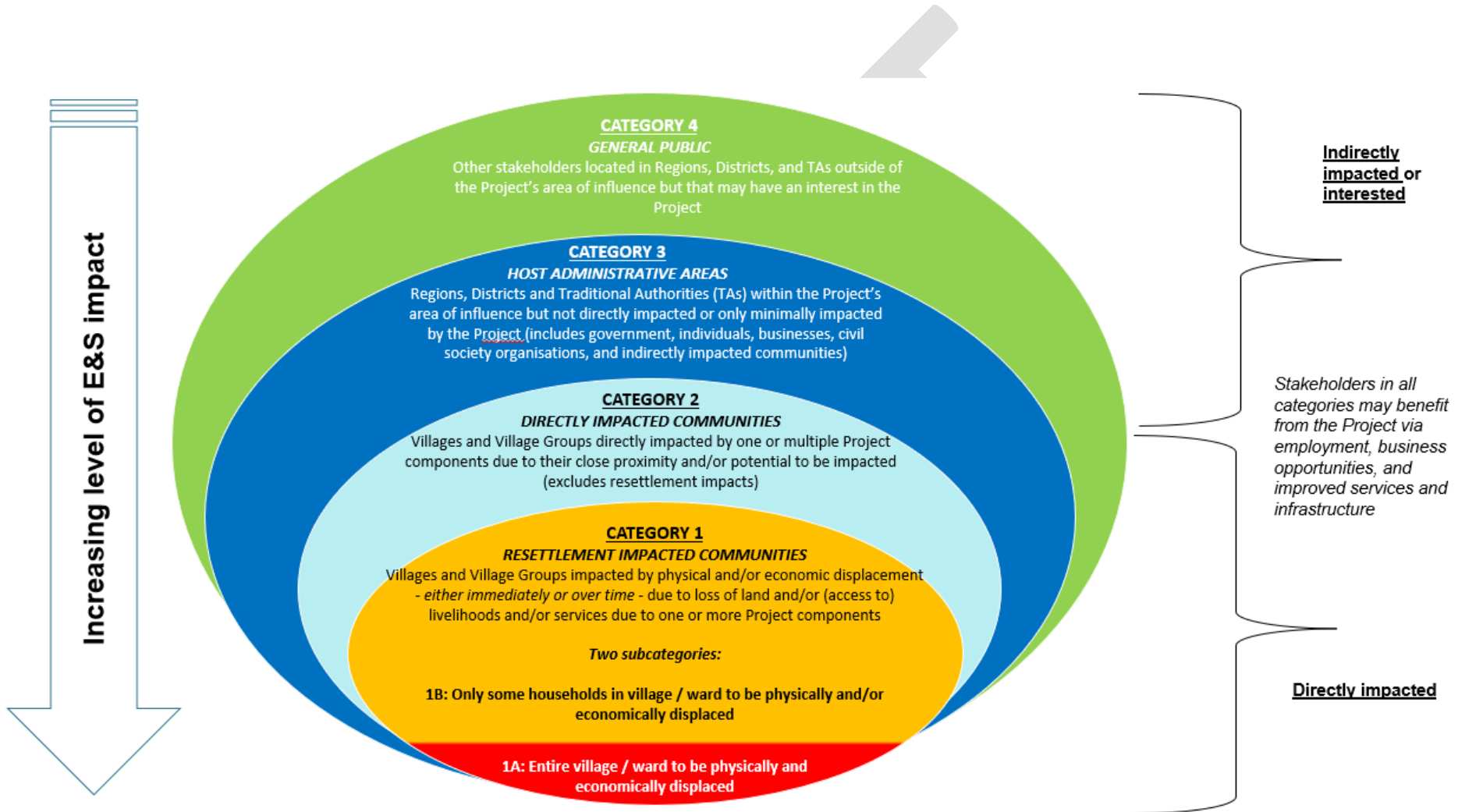
Villages and Group Villages directly impacted by one or multiple Project components due to their close proximity and/or potential to be impacted (excludes resettlement impacts).

- **Category 1 - Resettlement Impacted Communities:**

Villages and Group Villages that will be impacted by physical and/or economic displacement.

- **Category 1 A:** Entire village to be physically and economically displaced.
- **Category 1 B:** Only some households in the village and Group Village to be physically and economically displaced.

Figure 2 over the page provides a diagrammatic representation of the four stakeholder categories.



The E&S studies being undertaken for the Project during 2023 will identify and verify all villages (communities), Group Villages, and wards that fall within Stakeholder Categories 1, 2, and 3 and also clarify the spatial scope of potential environmental and social (E&S) impacts other than resettlement.

A preliminary list of Project-affected stakeholders, at Group Village level, is presented in Table 4-1 Categorisation of Group Villages. For Category 1 stakeholders (*highlighted in orange*), insufficient information is currently available to differentiate Category 1 stakeholders into the sub-categories 1A and 1B.

Table 4-1 Categorisation of Group Villages

PROJECT PHASE	PROJECT FACILITIES AND OTHER IMPACTS	DISTRICT	TRADITIONAL AUTHORITY (TA)	GROUP VILLAGE (GVH)	COMMENTS
EARLY WORKS	S137 Access Road to Site	Blantyre	Kunthembwe	Kaliati	All listed villages projected to be impacted by physical and/or economic displacement.
				Kunthembwe	
				Mbanda	
				Kadikira	
				Makunje	
				Stande Kumbirina	
			Chikumbu	Other potential E&S impacts to be clarified.	
Mlauli	Gwadani				
MAIN WORKS	Main Dam + Reservoir	Blantyre	Kunthembwe	Nzigala	Impacted by physical and/or economic displacement within the main dam + reservoir
	Regulating Dam + Reservoir			Namputu	Impacted by physical and/or economic displacement within the main dam + reservoir
Other infrastructure (powerhouse, construction camps, other)					

	Potential population influx				Projected to be impacted by population Influx
				Kaliati	<ul style="list-style-type: none"> ▪ Impacted by physical and/or economic displacement within Main Dam and Reservoir; ▪ Regulating Dam and Reservoir; ▪ Other infrastructure (<i>powerhouse, construction camps, other</i>).
				Imbwa	Impacted by physical and/or economic displacement within Regulating Dam and Reservoir.
				Majola	Projected to be impacted by population Influx
				Makajira	Projected to be impacted by population Influx
		Neno	Mlauli	Feremu	<ul style="list-style-type: none"> ▪ Impacted by physical and/or economic displacement within Main Dam and Reservoir; ▪ Regulating Dam and Reservoir.
			Mlauli	Nsalawatha	<ul style="list-style-type: none"> ▪ Impacted by physical and/or economic

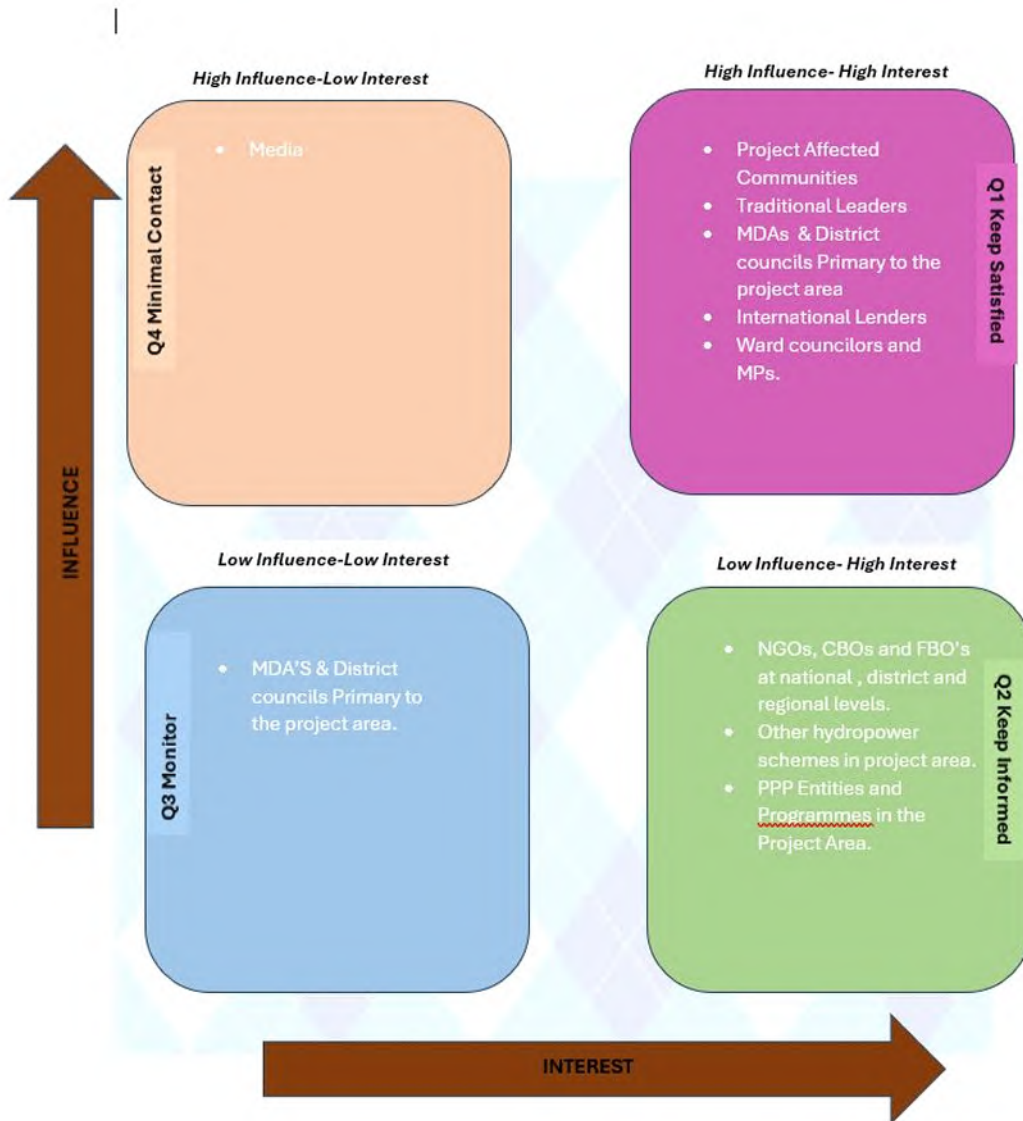
					displacement within Main Dam and Reservoir. <ul style="list-style-type: none"> Other infrastructure (<i>powerhouse, construction camps, other</i>).
			Symon	Ngwenyama	Impacted by physical and/or economic displacement within Main Dam and Reservoir.
		Balaka	Phalula	Phombeya	Not affected by other Project infrastructure.
				Feremu	<ul style="list-style-type: none"> Impacted by physical and/or economic displacement within Main Dam and Reservoir; Regulating Dam and Reservoir.
TRANSMISSION LINES	400 kV Transmission Line	Neno	Mlauli	Nsalawatha	Impacted by physical and/or economic displacement within: <ul style="list-style-type: none"> Main Dam and Reservoir. Other infrastructure (<i>powerhouse, construction camps, other</i>).
			Symon		Ngwenyama

					Reservoir.
				Kasamba	Not affected by other Project infrastructure.
				Muingitsa	
				Ntengula	
				Somisomi	
				Zalewa	
	132 kV Transmission Line	Blantyre	Kunthembwe	Imbwa	Impacted by physical and/or economic displacement within Regulating Dam and Reservoir.

4.4. Mapping Stakeholder Influence and Interest

The MHPP has identified the following stakeholders and mapped them based on their level of influence and interest as follows:

- The stakeholders that appear in the top right quadrant, Q1, are those that need to be managed closely (i.e. the stakeholders that need to be proactively engaged on a regular basis and engagement efforts should be focused on this group). This is because these are the stakeholders that are most interested in the Project and have the potential to impact its outcome (i.e. the ability of the Project to go ahead).
- The stakeholders that appear in quadrants Q2 and Q3 need to be kept informed, i.e., provided information and consulted on issues of interest to the stakeholders.
- The stakeholders in Q4 need to be monitored, i.e., informed of key Project aspects. It is important to track if their level of interest or impact changes.



Below is a list of stakeholders groups that have been identified. The list is not exhaustive and will keep on being updated, hence the stakeholder engagement plan will be a live document.

Stakeholder Mapping

STAKEHOLDER	LEVEL OF INFLUENCE/ POWER ON THE PROJECT	LEVEL OF INTEREST ON THE PROJECT	STAKEHOLDER CONTRIBUTION TO THE PROJECT	STAKEHOLDER HINDRANCE TO THE PROJECT	ENGAGEMENT STRATEGY	COMMENTS
Project Affected People / Communities	High	High	<ul style="list-style-type: none"> • Acceptance of the project, • assist in safeguarding project facilities from vandalism and theft during construction. 	<ul style="list-style-type: none"> • Resistance/ Protest the project 	Regularly engage + keep satisfied	Regularly inform them, consult on area of interest.
Traditional Leaders	High	High	<ul style="list-style-type: none"> • Mobilize/ Influence their wards to support the project. 	<ul style="list-style-type: none"> • Resistance/ Protest the project 	Regularly engage + keep satisfied	Engaging and consult on are of interest – e.g. land ownership,

						boundaries.
National, Regional Ministries, Departments and Agencies (MDAs) - Ministry of Energy and District Councils Primary to the Project - Neno, Blantyre, Balaka.	High	High	<ul style="list-style-type: none"> • Provide policy direction. • Provide guidance in the various phases of the project 	<ul style="list-style-type: none"> • Not regulating and coordinating the implemented policies. 	Regularly engage + Keep satisfied	Involve them in governance, decision making and during negotiations with various partners in the project
National, Regional Ministries, Departments and Agencies (MDAs) and District councils, secondary to the Project.	Low	Low	<ul style="list-style-type: none"> • Provide data necessary to the project 	<ul style="list-style-type: none"> • Not providing the required data when requested. 	Essential information + Minimal contact	Involve them on a need be basis.
Non-Governmental Organisations (NGOs), Community-Based Organisations (CBOs) and Faith-based Organisations (FBOs): National, Regional and	Low	High	<ul style="list-style-type: none"> • Mobilise and sensitize people /Communities they serve to support the project as it benefits the whole country. 	<ul style="list-style-type: none"> • Project resistance 	Inform + Monitor closely	Engage them and utilize their interest and influence.

District levels.						
Other hydropower schemes in Project areas.	Medium	High	They will support MHPP , they will consider that this project will have an impact on their businesses.	<ul style="list-style-type: none"> They might see MHPP as a threat to the success of their projects/ operations. 	Inform + monitor closely	
Public, Private and/or Public Private Partnership (PPP) Entities and Programmes in the Project Area.	Low	High	<ul style="list-style-type: none"> Facilitate the implementation of the public-private partnership in the project 	<ul style="list-style-type: none"> Failure to provide guidance on public-private partnership 	Inform + Monitor closely	Engage and consult in area of interest.
Public media.	Medium	Low	<ul style="list-style-type: none"> News coverage – publicizing the project. giving project updates to the general public. 	<ul style="list-style-type: none"> Negative Publicity 	Essential Information and Minimal contact.	Only engage the media when necessary (Project updates newsworthy).
Ward Councilors & Members of Parliament	High	High	<ul style="list-style-type: none"> Political will/ support towards the project 	<ul style="list-style-type: none"> Political interference 	Engage + Keep satisfied	They should be engaged and

						consulted in specific phases of the project.
International lenders	High	High	<ul style="list-style-type: none"> • Providing funding • Fully Committed to the project • monitoring and supervision missions • Ensuring successful implementation of mitigation measures for all safeguard policies triggered by this project. 	<ul style="list-style-type: none"> • Macroeconomics risk – Increase in project cost due to inflation/devaluation of the Malawi kwacha. • Withhold funding 	Regularly engage + Keep satisfied.	Fully involve them and constantly give them reports/project updates

4.5. Tracking Changes in Stakeholder Attributes

It is important to note that stakeholder mapping and analysis is an ongoing process since new stakeholders may be identified over time as the Project expands and/or the socio-cultural, economic, and political environment changes. Moreover, current stakeholders' perceptions, expectations, priorities, and concerns may change due to unforeseen events such as the emergence of social conflicts, e.g. land-related, cultural etc, natural disasters, a surge in communicable diseases, or Project-related environmental incidents, to name a few possibilities.

In fact, one of the main purposes of stakeholder mapping and analysis is to determine which stakeholder relations should be established, maintained, or improved and through which modes of engagement. Thus, one of the requirements of the SEP is that the stakeholder mapping and analysis be reviewed and revised, where necessary, on a periodic basis to determine whether any changes have occurred, either due to contextual factors or to actions undertaken by the Project.

5. Previous and Ongoing Stakeholder Engagement Activities

5.1. Previous Engagement Activities

Under a World Bank supported Energy Sector Support Project (ESSP), pre-feasibility, feasibility studies, including a preliminary ESIA, were commenced for the Mpatamanga Project during 2015-2018. Geotechnical investigations, a detailed topographic survey, and draft tender documents were also developed. These studies and documents resulted in a partnership agreement between the GoM and IFC InfraVentures signed in April 2019 for IFC to act as co-developer with the GoM to develop and prepare all the documentation for the Mpatamanga Project to be tendered to the private sector.

In parallel with the tendering process for the private sector, the IFC and GoM appointed international consulting firm, Mott Macdonald, accompanied by national consulting firm, C12, in August 2020 to complete the ESIA, BAP and RAP for the Project and to meet GoM regulatory requirements for permitting. As a part of RAP development, asset surveys were led by Department of Lands (DoL) in close coordination with local authorities. The RAP consultant, in coordination with the DoL and local authorities, also undertook household socio-economic surveys of the affected households. The ESIA and RAP studies, as well as the asset survey report were suspended during 2021.

The 2021 ESIA prepared by Mott MacDonald summarises the key engagement and public participation activities that took place between 2016 and 2017 (mostly by AGRI PRO, *Ambiente Consultores SA* and CENOR Consulting Engineers) in addition to those that took place between 2018 and 2019 by ESIA consultants Multiconsult and The Biodiversity Consultancy (TBC).

From 2020 to 2021, stakeholder consultations were largely undertaken by Mott MacDonald and C12, accompanied by DoL and other local authorities. Stakeholders that were consulted included ESCOM officials, district executive committees, traditional leaders, members of parliament and councillors for the project area, opinion leaders, village heads, Village Development Committees (VDC), Area Development Committees (ADC) and potential Project Affected Peoples (PAPs) impacted by the main reservoir as defined in the original ESIA.

Some concerns and issues were raised by local communities to NGOs during community-led research (International Accountability Project and Coalition for Human Rights in Development, 2022a) in 2021 and subsequent consultations in 2022 (International Accountability Project and Coalition for Human Rights in Development, 2022b).

These included:

- Lack of information on the Project, including a lack of clarity on the areas to be affected by the Project and the Project schedule.
- Uncertainty on the eligibility criteria and the entitlements for PAPs.
- Lack of information on the next steps of the land acquisition and compensation process, with some households claiming to have stopped cultivating their lands in 2021 as they were expecting compensation to take place at that time.

In response to the issues raised by the communities and the local NGO, the Government of Malawi, through the Ministry of Energy prepared a Protocol for a Stakeholder Engagement Plan for the preparation stage (P-SEP-P) in 2022 to:

- Comply with the effective public participation, consultation, and stakeholder engagement as required by the country Environmental Management Act of 2017 and the WB-IDA Environmental and Social Standard (ESS) 1, 5, 7, and 8, and IFC Performance Standard PS 1.
- Continue with the dialogue and consultations for the Project that commenced in 2015 with the preparation of a preliminary ESIA.
- Provide necessary Project information to communities and respond to claims, concerns, and grievances from stakeholders.
- Prevent further national and international claims that may negatively impact Project development and reputation.

In accordance with the P-SEP-P, regular engagement with Project-affected communities and other key stakeholders by the PIU and MHPL has been ongoing since July 2022. These current activities are described in Section 5.2. This Project SEP incorporates the P-SEP-P framework, and takes precedence over all other stakeholder engagement planning documents.

5.2. Ongoing Engagement Activities

The current phase of stakeholder engagement activities commenced in July 2022 when the GoM met with the Blantyre and Neno District Councils and traditional authorities from Blantyre District.

Since September 2022, MHPL and the GoM PIU have established the following stakeholder engagement schedule:

- *Monthly community meetings:* Conducted in each of the five Group Villages directly impacted by the Main Dam facilities (as identified during the 2020-2021 resettlement surveys).
- *Quarterly stakeholder meetings:* Hosted in Blantyre and Lilongwe and including National and regional government ministries, departments, and agencies (MDAs); District Councils (Project-affected districts and potentially project affected districts); national, regional and district Non-Governmental Organisations (NGOs); non-community-based PAPs; Public, Private and Public Private Partnership (PPP) entities and programs; other Hydro Power schemes in the Project area.
- As required E&S monitoring of Project-related technical and E&S studies.
- Weekly presence of MHPL Grievance Officer and Community Liaison Officers (CLOs) in directly affected Group Villages to collect feedback submitted via MHPP Suggestion boxes.

In addition, short-term and targeted engagement activities have been undertaken by and/or in alignment with E&S Consultants and/or Technical Consultants contracted by MHPL and/or the PIU since around October 2022; to progress the development of the MHPP.

To commence the implementation of the Project Grievance Redress Mechanism (GRM), the following activities were jointly undertaken by MHPL and the GoM PIU:

- *November 2022:* Election of Village Grievance Redress Committees (VGRC) in each of the five directly impacted Group Villages identified to date.
- *December 2022:* Development of grievance reporting management forms, training materials and training of Village Grievance Redress Committees (VGRCs)
- *April 2023:* Refresher training for the VGRCs.

The monthly community meetings will be extended to other directly impacted Group Villages that will be identified during the upcoming E&S studies. The election and training of VGRCs will similarly be extended to other directly impacted Group Villages that will be identified during the upcoming E&S studies. Ongoing capacity-building of VGRCs will be undertaken.

6. Stakeholder Engagement Strategies

The MHPP recognises that meaningful engagement with its stakeholders, based on the principles of informed consultation, participation, transparency, accountability, and respect for human rights, is fundamental to managing the social and environmental sustainability of the Project, contributing to

successful Project design and implementation, and establishing and maintaining a Social License to Operate (SLO) for the Project⁴.

The Project will therefore undertake stakeholder engagement to:

- Create long-term, positive relationships with stakeholders.
- Disclose Project information to enable stakeholders to contribute meaningfully to impact management throughout the Project life cycle.
- Establish a constructive dialogue with stakeholders to understand their concerns and collaboratively seek solutions.
- Commit to addressing stakeholder concerns and grievances in a fair, transparent, and effective manner.

To ensure the Project's stakeholder engagement is effective and supports the development of strong, constructive, and responsive stakeholder relationships, the following principles guide the stakeholder engagement strategies and practice:

- Open and transparent engagement:
 - Timely dissemination of Project information to allow stakeholders to understand the risks and impacts of the project, to provide input into project design, management and mitigation measures of impacts and risks, and to understand potential opportunities.
 - Disclosure of proposed stakeholder engagement process, highlighting opportunities for participation.
 - Disclosure of schedule for public consultation meetings, including time, venue, notification methods, and record-keeping protocols.
 - Disclosure of the grievance management process, highlighting the various access points.
 - Direct discussion and active management of unrealistic stakeholder expectations.
- Meaningful consultation:
 - **Timely:** Engagement to commence as early as possible in the Project life cycle to enable meaningful consultation on Project design.
 - **Relevant:** Engagement on Project information that is relevant and of concern to different stakeholders.
 - **Understandable:** Information to be presented in a format and language that is understandable to different stakeholders.

⁴ SLO refers to the ongoing acceptance and approval of a development project by local community members and other stakeholders that can affect its activities. It is the real or current credibility, reliability, and acceptance of a project.

- **Accessible:** Disclosed Project information to be accessible to all Project stakeholders, including those with low literacy levels.
- Inclusive:
 - Allows effective participation of those identified as disadvantaged, vulnerable, or marginalised.
 - Differentiated engagement measures included to ensure meaningful participation of disadvantaged, vulnerable or marginalised groups.
- Culturally appropriate:
 - Respects cultural protocols for accessing stakeholder groups and scheduling, attending, and chairing meetings.
 - Adopts culturally appropriate dress codes and greeting rituals.
 - Aligns engagement format and language with culturally appropriate practices, recognizing that certain stakeholder groups may prefer verbal and in-person communication.
 - *Free of manipulation, interference, coercion, discrimination, and intimidation.*
 - *Effective grievance management procedure in place.*

6.1. Community Engagement Strategy

The Community Engagement Strategy (CES) focuses on engagement with Project-affected communities and the traditional and government authorities that administer these communities.

The Project footprint will, for the most part, directly impact rural communities. Project-affected communities reside in rural villages and/or homestead clusters that are widely distributed across administrative areas. The administrative areas relevant to the CES, from the smallest geographical and administrative area to the largest, are Village; Group Village; Traditional Authority and District. The corresponding administrative authorities are Village Head; Group Village Head; Traditional Authority and District Council.

The Project-affected communities generally have low education and low literacy levels. The language most spoken and widely understood in the communities is Chichewa.

Table 6-1 provides a detailed presentation of the CES, including engagement method, frequency of engagement for each method, purpose of engagement for each method, responsible parties, as well as explanatory notes. All engagement and consultation to be undertaken in accordance with relevant cultural protocols, pre-existing local modes of engagement and communication, local language needs, and consideration of education and literacy levels.

The CES will be operationalised through internal Community Engagement Programs (CEP) that will be developed for each Project phase and related engagement requirements. The CEPs will include

detailed schedules, budgets, and staff resourcing. The first CEP focuses on the Project development phase up to the mobilisation of Early Works; October 2023 to April/May 2025, and will include directly impacted communities as identified through the RLRAP, ESIA, BAP and CIA studies.

A summary of the CES is provided below:

- **Community Meetings:**
 - Continue with **monthly community meetings** in the **directly impacted communities** within the five Group Villages that have been identified to date.
 - Extend **monthly community meetings** to other **directly impacted Group Villages** that are identified and/or verified during the E&S studies.
 - Conduct **quarterly meetings** with the Village Heads, Group Village Heads and Traditional Authority of **directly impacted Group Villages** a few hours prior to the monthly community meetings (at the request of these authorities).
 - Conduct **biannual community meetings** with **indirectly impacted Group Villages** that are identified and/or verified during the E&S studies.
 - Conduct **annual meetings** with the Village Heads, Group Village Heads and Traditional Authority of **indirectly impacted Group Villages** a few hours prior to the monthly community meetings.
 - **Focus group discussions and/or one-to-one interviews** with directly and indirectly impacted communities to obtain feedback on GRM, GBV/SHEA management procedure, identify community needs and/or verify vulnerability categories. As required.
 - Ad hoc meetings: Only as required to avoid stakeholder fatigue.
- **Community Presence:**
 - **Community Centres:**
 - *Project phase:* Construction and Operation.
 - *Purpose:* Establish a Project presence in the most significantly impacted Districts (Blantyre and Neno) where all stakeholders can come to engage Project staff, collect and/or share information, submit feedback, including grievances.
 - Blantyre District: A community centre will be established in an appropriate location, staffed by CLOs and/or Grievance Officers, ensuring a weekly presence.
 - Neno District: A community centre will be established in an appropriate location, staffed by CLOs and/or Grievance Officers, ensuring weekly presence.
 - **Mobile Community Liaison:**
 - *Project phase:* Development, Construction, and Operation.

- *Purpose:* To ensure that all affected community members have access to Project information and GRM, including vulnerable members that cannot access monthly meetings. To establish and maintain a constructive relationship with communities.
- CLO and/or Grievance Officer to visit each directly impacted village at a minimum every quarter to communicate Project information, collect and respond to community feedback, including grievances, and present and distribute Project information materials, including for the GRM, GBV/SHEA management procedure. The HSE team will join these quarterly visits periodically to sensitise communities on selected health and safety issues relevant to the Project and communities. These mobile Community Liaison visits will be in addition to the monthly community meetings. Mobile community liaison activities with directly impacted villages will commence in Q1 2024.
- CLO and/or Grievance Officer to visit each indirectly impacted village once annually to communicate Project information, collect and respond to community feedback, including grievances, and present and distribute Project information materials, including for the GRM, GBV/SHEA management procedure. These community liaison activities with indirectly impacted villages will be conducted prior the commencement of the Early Works and Main Works. The HSE team will join these annual visits periodically to sensitise communities on selected health and safety issues relevant to the Project and communities. These mobile Community Liaison visits will be in addition to the monthly community meetings. Mobile community liaison activities with indirectly impacted villages will commence once the Project is approved.
- *Project Stakeholder Committees:*
 - **Group Village Grievance Redress Committees (GVGRCs):**
 - *Project phase:* Development, Construction, and Operation.
 - *Purpose:* Access point to receive and resolve grievances and communicate Project information using approved FAQs.
 - *Currently:* Five existing VGRCs in each of the five **directly impacted** Group Villages where monthly community meetings are currently held. Regular training and capacity-building on Project GRM, GBV/SHEA management procedure, and FAQs.
 - *Going forward:* Establish new VGRCs in other **directly impacted** Group Villages identified through the E&S studies. Training and capacity-building on Project GRM, GBV/SHEA management procedure, and FAQs.
 - Selected VGRC members volunteer to keep and manage Suggestion Boxes to receive Project feedback (currently, 22 boxes functional across five Group Villages).

- **Resettlement Working Groups (RWGs):**
 - Project Phase: Planning, implementation and monitoring phases of land acquisition and resettlement activities including livelihood restoration.
 - Purpose: Consultative forum for Project land acquisition and resettlement activities. RWG to represent the interests of PAP in terms of compensation and resettlement-related benefits and communicate RWG decisions to PAP.
 - Will be established in each District where Project impacts include physical and/or economic displacement: Blantyre, Neno, and Balaka. Timing of establishment of RWGs to be determined by land acquisition and resettlement schedules.
 - RWG membership: District Council officers, Traditional Authorities, Group Village Heads, Village Heads, elected Project-Affected Persons (PAP).
- **Community Theatre:**
 - *Project phase:* Development (resettlement activities), Construction, and Operation.
 - *Purpose:* To communicate Project information and messages in an interactive manner that is accessible to all community members.
 - Quarterly or as required theatre productions that include community “actors” to communicate Project-related messages in an effective and interactive manner.
 - Specific Project-related topics, incl. Risks associated with not spending compensation money wisely (resettlement); GRM management procedure; GBV/SHEA management procedure; workers’ rights; HSSE incident management procedure.
 - Broader topics (also Project-related): Human rights; GBV/SHEA; HIV/AIDS and STIs; traffic and road safety; diagnosis and management of chronic diseases; vector-borne and water-borne diseases (malaria, cholera); hygiene etc.
- **Project Media:**
 - *Project phase:* Development, Construction, and Operation.
 - *Purpose:* Communicate Project
 - Quarterly Project Newsletters (Chichewa and English).
 - GRM flowchart and brochure; GRM contact cards.
 - GBV/SHEA flowchart and brochure.
 - Posters, flyers and other.
 - Videos.
 - Printed media directed at Project-affected communities will consider literacy levels and prioritize infographics and explanatory diagrams and images.

- **Public Media:**
 - **Local and community radio:**
 - *Project phase:* Development, Construction, and Operation.
 - *Purpose:* To communicate Project information to impacted communities in an accessible and wide-reaching manner.
 - Project information and updates.
 - Interviews (Q and A) with MHPL spokesperson/s (pre-recorded or live).
 - Publicise GRM and GBV/SHEA management procedures.
 - Publicise community meeting schedules.
 - Publicise Project access points and schedules (community centres (fixed and mobile), contact numbers).
 - **Newspapers:**

Focus will be on infographics and flowcharts.

 - *Project phase:* Development, Construction, and Operation.
 - *Purpose:* Publish key project information to the wider public.
 - Project information and updates; wide audience, including Project-affected communities.
 - Project GRM flowchart and brochure; GBV/SHEA management procedure flowchart and brochure; wide audience, including Project-affected communities.
 - **Social Media:**
 - *Project phase:* Development, Construction, and Operation
 - *Purpose:* To publicise Project information to the wider public
 - Publish project IEC Materials online.
 - Publicise Job Opportunities
 - Publicise project activities.

Table 6-1: Community Engagement Strategy

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
Community meetings	<i>Directly impacted</i> communities	Monthly		<ul style="list-style-type: none"> Keep informed of and disclose Project information. Record and respond to (where appropriate) questions, concerns, and comments (QCC). Record and respond to (where appropriate) complaints / grievances. Feedback on Project-related questions, concerns, and comments (QCC). Present / review grievance management procedure, including GBV/SHEA referral pathways. Provide feedback on Project-related complaints / grievances (number received, number resolved, number under investigation). Provide feedback on local employment to date and upcoming employment opportunities. Identify and manage potential risks and negative impacts. Identify potential areas for community investment / support. Special topics e.g., human rights, resettlement-related, community health and safety, GBV, and SHEA etc. 	<ul style="list-style-type: none"> MHPL PIU DC 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Lessons learnt meetings/workshop Store records on central server 	Number of villages / group villages to be included in monthly meeting schedule will increase as Project gears up.
	Leaders of <i>directly impacted</i> communities (Village Heads, Group Village Heads, TAs)	Quarterly	Development Construction Operation	<ul style="list-style-type: none"> Keep informed of and disclose Project information. Inform leaders of content to be presented in upcoming community meetings, obtain feedback, and elicit support for key messages to be shared. Provide feedback on complaints / grievances received since previous monthly meeting (where appropriate and maintaining confidentiality). Educate on grievance management procedure and GBV/SHEA management procedure. Identify and manage potential risks and negative impacts. Identify potential areas for community investment / support. Special topics e.g., human rights, workers' rights, resettlement-related topics, community health and safety, GBV/SHEA etc. 	<ul style="list-style-type: none"> MHPL PIU DC 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Store records on central server 	Number of village heads / group village heads to be included in monthly meeting schedule will increase as Project gears up.
	<i>Indirectly impacted</i> communities	Annual and/or Bi-annual during construction		<ul style="list-style-type: none"> Keep informed of and disclose Project information. Record and respond to (where appropriate) questions, concerns, and comments (QCC). Record and respond to (where appropriate) complaints / grievances. Feedback on Project-related questions, concerns, and comments (QCC). Present / review grievance management procedure, including GBV/SHEA referral pathways. Provide feedback on Project-related complaints / grievances (number received, number resolved, number under investigation). Provide feedback on local employment to date and upcoming employment 	<ul style="list-style-type: none"> MHPL PIU DC 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register 	Number of villages / group villages to be included in monthly meeting schedule will increase as Project gears up.

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
				<ul style="list-style-type: none"> opportunities. Identify and manage potential risks and negative impacts. Identify potential areas for community investment / support. Special topics e.g., human rights, resettlement-related, community health and safety, GBV, and SHEA etc. 		<ul style="list-style-type: none"> Store records on central server 	
	Leaders of indirectly impacted communities (Village Heads, Group Village Heads, TAs)	Annual and/or Bi-annual during construction	Development Construction Operation	<ul style="list-style-type: none"> Keep informed of and disclose Project information. Inform leaders of content to be presented in upcoming community meetings, obtain feedback, and elicit support for key messages to be shared. Provide feedback on complaints / grievances received since previous monthly meeting (where appropriate and maintaining confidentiality). Educate on grievance management procedure and GBV/SHEA management procedure. Identify and manage potential risks and negative impacts. Identify potential areas for community investment / support. Special topics e.g., human rights, workers' rights, resettlement-related topics, community health and safety, GBV/SHEA etc. 	<ul style="list-style-type: none"> MHPL PIU DC 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Store records on central server 	Number of village heads / group village heads to be included in monthly meeting schedule will increase as Project gears up.
	Ad hoc	As required	Development Construction Operation	<ul style="list-style-type: none"> Exceptional meetings where information/messages cannot be aligned with monthly community meetings due to specificity or urgency. For example, ESIA disclosure; election of Resettlement Working Groups etc. 	<ul style="list-style-type: none"> MHPL PIU DC 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Store records on central server 	Minimize such instances to avoid stakeholder fatigue.
	Focus group discussions and/or interviews	As required	Development Construction Operation	<ul style="list-style-type: none"> Consultation and participation on certain Project aspects, e.g., designing and improving GRM and GBV/SHEA management procedures; improving local labour policy etc. Identifying and obtaining feedback from vulnerable groups. Identifying community needs and potential community development initiatives. 	<ul style="list-style-type: none"> MHPL 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Stakeholder register 	Community groups to be included: Women, elderly, youth, leaders, etc.

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
						<ul style="list-style-type: none"> Store records on central server 	
Quarterly stakeholder meetings	Non-community-based landowners to be economically displaced	Quarterly	Development Construction Operation	<ul style="list-style-type: none"> Keep informed of and disclose Project information. Record and respond to (where appropriate) questions, concerns, and comments (QCC). Record and respond to (where appropriate) complaints / grievances. 	<ul style="list-style-type: none"> MHPL PIU 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Store records on central server 	Conducted as part of quarterly stakeholder meetings with "Other interested parties"
Community Presence: Community Centres	MHPP Community Centre (Blantyre)	3 days per week (once and if community centres are established)	Construction Operation	<ul style="list-style-type: none"> Project access point and information hub (Project staff member/s, maps, brochures, infographics, quarterly newsletters, video, photos, other. GRM and GBV/SHEA access point. Record questions, comments, and concerns in feedback register. Employment and local procurement: Advertise employment and procurement opportunities, receive and record employment and procurement queries; receive and file CVs. Office space, as needed, for GBV/SHEA coordinators. Meeting space for other Project meetings (scheduled and ad-hoc). 	At least one MHPL staff member will be present in the MHPP Community Centre: <ul style="list-style-type: none"> Grievance Officer CLO HSSE (nurse) GBV/SHEA coordinator (as per schedule). 	<ul style="list-style-type: none"> Visitor register Feedback register Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on central server 	Community Centre to be established at temporary Project campsite, next to clinic, in a suitably equipped container.
Community Presence: Community Centres	MHPP Community Centre (Neno)	1 day per week (once and if community centres are established)	Construction Operation	<ul style="list-style-type: none"> Project access point and information hub (Project staff member/s, maps, brochures, infographics, quarterly newsletters, video, photos, other. GRM and GBV/SHEA access point. Record questions, comments, and concerns in feedback register. Employment and local procurement: Advertise employment and procurement opportunities, receive and record employment and procurement queries; receive and file CVs. Office space, as needed, for GBV/SHEA coordinators. Meeting space for other Project meetings (scheduled and ad-hoc). 	<ul style="list-style-type: none"> MHPL Grievance Officer CLO GBV/SHEA coordinator (as per schedule) 	<ul style="list-style-type: none"> Visitor register Feedback register Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on central server 	Use existing structure (Community-Based Organisation) in proximity to Project-affected communities in Neno District

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
Community Presence: Community Outreach	MHPP Mobile Community Liaison	Minimum quarterly visit to each directly impacted village Annual visit to each indirectly impacted village	Development Construction Operation	<ul style="list-style-type: none"> Access vulnerable and other groups who do not attend monthly community meetings. GRM and GBV/SHEA access point for vulnerable and other groups. Inform and disclose Project information. Distribute Project communication media (quarterly newsletters, GRM brochures, etc.). GRM and GBV/SHEA access point. Develop community profiles for each village. 	<ul style="list-style-type: none"> MHPL Grievance Officer CLO The GBV/SHEA coordinator will be present as per schedule. 	<ul style="list-style-type: none"> Feedback register Photographs of participants, with permission Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on central server 	<p>Start with directly impacted villages in Neno and Blantyre Districts</p> <p>Two villages per day: AM and PM.</p> <p>To start: Monthly visits. Adjust as appropriate based on community needs and Project phase.</p>
Project Stakeholder Committees	Village Grievance Redress Committee (VGRC)	One VGRC per directly impacted Group Village	Development Construction Operation	<ul style="list-style-type: none"> GRM access point: In-person or via Project Suggestion Box. Project feedback access point: In-person or via Project Suggestion Box. GRM management procedure: Support sensitization of communities on GRM; Provide immediate response to grievances (where possible and appropriate); participate in investigation of grievances (where appropriate); and support in communicating resolutions (where appropriate). Engagement focal points: Record questions, comments, and concerns in feedback register; respond to questions, comments, and concerns based on Project-approved FAQ. GBV/SHEA access point (selected VGRC members). GBV/SHEA management procedure: Support sensitization of communities on procedure; connect complainant to GBV/SHEA referral pathway and service provider. Educating VGRCs on workers' rights and human rights. CLO or Grievance Officer to have monthly meeting with VGRC members keeping Suggestion Box as well as VGRC chairman to review and discuss feedback register. 	<ul style="list-style-type: none"> Elected community representatives CLO or Grievance Officer 	<ul style="list-style-type: none"> Feedback register Photographs of participants, with permission Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on central server 	<p>Current Project phase: 5 VGRCs established.</p> <p>Number will increase as Project ramps up.</p>
	Resettlement Working Group (RWG)	One RWG per directly impacted District	<i>RLRAP Activities:</i> Development, Implementation, and Monitoring	<ul style="list-style-type: none"> Represent interests of physically and/or economically displaced PAP regarding compensation and resettlement-related benefits, including livelihood restoration measures. Communicate resettlement-related information and benefits to PAP (as required). 	<ul style="list-style-type: none"> District government officials. Customary authorities. Elected PAP representatives 	<ul style="list-style-type: none"> Attendance register Minutes of meetings Photographs of meeting participants, with permission Feedback Register Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on 	<p>RWGs for Blantyre District and Neno District to be established in September 2023 (excl. PAP representatives).</p> <p>Number will increase as Project ramps up.</p>

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
						central server	
Community theatre and role-play	Topic-specific productions	As required: Focus on directly impacted communities	Development Construction Operation	<ul style="list-style-type: none"> To communicate and educate affected communities in an engaging, interactive, and culturally appropriate manner. Specific Project-related topics, incl. Risks associated with not spending compensation money wisely (resettlement); GRM management procedure; GBV/SHEA management procedure; workers' rights; HSSE incident management procedure. Broader topics (also Project-related): Human rights; GBV/SHEA; HIV/AIDS and STIs; traffic and road safety; etc. 	<ul style="list-style-type: none"> Appoint local specialists (Blantyre). Community participation. 	<ul style="list-style-type: none"> Attendance register Video recordings, with permission Photographs, with permission Action Tracker (record action items arising from meetings) Grievance register Stakeholder register Store records on central server 	None
MHPP Communication media	<p><i>Printed:</i> Newsletters; brochures; posters; contact cards</p> <p><i>Video:</i> Project design</p> <p><i>Audio:</i> Project jingle; recorded Q&A "interviews"</p>	<p>MHPP Newsletter: Quarterly</p> <p>Brochures and posters: As required.</p> <p>GRM contact cards: Ongoing</p> <p>Video and audio: As required</p>	Development Construction Operation	<ul style="list-style-type: none"> Project information and updates: Activities to date (previous period) and upcoming activities. Key project milestones and/or announcements. GRM and GBV/SHEA management procedures. SEP: Community engagement modes and schedule. Other topics: Resettlement-related. Broader topics (also Project-related): Human rights; GBV/SHEA; HIV/AIDS and STIs; traffic and road safety; etc. 	<ul style="list-style-type: none"> <i>Distribution:</i> Community meetings. MHPL: MHPP Community Centres. MHPL: MHPP community visits. VGRC members RWG members Notice boards. 	<ul style="list-style-type: none"> Store records on central server Stakeholder register (record distribution dates and places) Feedback register 	<ul style="list-style-type: none"> Low literacy levels in affected communities. MHPP Quarterly Newsletters to be read out at monthly meetings. Brochures with infographics demonstrating information are crucial.
Public media	Local and community radio National newspapers	As required	Development Construction Operation	<ul style="list-style-type: none"> Project information and updates. Interviews (Q and A) with MHPL spokesperson/s (pre-recorded or live). Publicise GRM and GBV/SHEA management procedures. Publicise community meeting schedules. Publicise Project access points and schedules (community centres (fixed and mobile), contact numbers). 	MHPL	<ul style="list-style-type: none"> Records of correspondence with newspapers. Copies of publications Store records on central server 	<ul style="list-style-type: none"> Low literacy levels in affected communities. Local and community radio are effective means to communicate Project announcements. National

Engagement Method	Sub-Category	Frequency/Number	Project Phase	Purpose	Facilitator/s	Record Keeping	Notes
							newspapers are an effective means to publicise GRM and GBV/SHEA management procedure to a broader audience.

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6.2. Stakeholder Engagement Implementation Plan

The Stakeholder Engagement Implementation Plan outlines the plan for engaging with the Project stakeholders categorised as “Other interested parties” to distinguish these stakeholders from Project-affected communities, categorised as “Project-affected parties”. The Stakeholder Engagement Implementation Plan focuses on stakeholder categories, while recognising that specific stakeholders within these categories may require different modes of engagement at different phases of the Project. Stakeholder categories include:

- National Ministries, Departments and Agencies (MDAs): Primary and secondary to the Project.
- Regional MDAs: Southern region and other regions.
- District Councils: Directly and indirectly impacted districts.
- Non-Governmental Organisations (NGOs), Community-Based Organisations (CBOs) and Faith-based Organisations (FBOs): National, Regional and District levels.
- Other hydropower schemes in Project areas.
- Public, Private and/or Public Private Partnership (PPP) Entities and Programmes in the Project Area.
- Public media.
- International lenders.

Table 6-2 provides a detailed presentation of the Stakeholder Engagement Implementation Plan, including stakeholder category, engagement method, objective of engagement, frequency of engagement, key messaging, records of engagement, and facilitator/s.

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Table 6-2: Stakeholder Engagement Implementation Plan

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
National MDAs	<i>Primary:</i> <ul style="list-style-type: none"> Formal quarterly stakeholder meetings. Ad hoc meetings as required. Ad hoc workshops as required. Formal letters to ministries for technical or other support required for specific activities or issues. 	<ul style="list-style-type: none"> Establish and maintain constructive relationships. Build and maintain trust in the credibility of the Project by communicating in a transparent and accurate manner. Provide information on current and planned project activities, including resettlement, community development projects, stakeholder engagement activities, as well as issues identified, and grievances submitted. Discuss key issues of interest and request government intervention/clarification of issues, if required. 	<ul style="list-style-type: none"> Weekly (PIU only) Monthly (PDC only) Quarterly Ad hoc 	<ul style="list-style-type: none"> Up-to-date information on current and planned project activities (including resettlement). Report on stakeholder engagement activities undertaken and issues arising in preceding week and/or month and/or quarter. Report on Project grievances recorded, under investigation, and resolved during preceding week and/or month and/or quarter. Follow-up on action items arising from previous engagements with MDAs. Ministry of Energy and MHPL websites. 	<ul style="list-style-type: none"> Written meeting requests. Meeting agendas. Power Point presentations for quarterly meetings. Attendance registers. Photographs of meeting participants, with permission. Minutes of meetings. List of action items arising from meetings. Written requests for technical or other support 	<ul style="list-style-type: none"> MHPL PIU
	<i>Secondary:</i> <ul style="list-style-type: none"> Quarterly 		<ul style="list-style-type: none"> Quarterly Ad hoc 			

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
	Stakeholder meetings. <ul style="list-style-type: none"> Ad hoc meetings as required. Ad hoc workshops as required. 	technical and other support required for planned activities, including resettlement, community development projects, engagement activities, capacity building for communities, road safety.			required from provincial governor or ministries.	
Regional MDAs	<i>Southern Region:</i> <ul style="list-style-type: none"> Quarterly Stakeholder meetings. Ad hoc meetings as required. Ad hoc workshops as required. 	<ul style="list-style-type: none"> Establish and maintain constructive relationships. Build and maintain trust in the credibility of the Project by communicating in a transparent and accurate manner. Provide information on current and planned project activities, including resettlement, community development projects, stakeholder engagement activities, as well as issues identified, and grievances 	<ul style="list-style-type: none"> Quarterly Ad hoc 	<ul style="list-style-type: none"> Up-to-date information on current and planned project activities (including resettlement). Report on stakeholder engagement activities undertaken and issues arising in preceding week and/or month and/or quarter. Report on Project grievances recorded, under investigation, and resolved during preceding week and/or month and/or 	<ul style="list-style-type: none"> Written meeting requests. Attendance registers. Photographs of meeting participants, with permission. Minutes of meetings. List of action items arising from meetings. Written requests 	<ul style="list-style-type: none"> MHPL PIU
	<i>Other Regions:</i> <ul style="list-style-type: none"> As required. 		<ul style="list-style-type: none"> As required 			

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		submitted. <ul style="list-style-type: none"> Inform of technical and other support required for planned activities, including resettlement, community development projects, engagement activities, capacity building for communities. 		quarter. <ul style="list-style-type: none"> Follow-up on action items arising from previous engagements with MDAs. 	for technical or other support required from urban government authorities.	
District Councils (DCs)	<i>Directly Impacted Districts:</i> <ul style="list-style-type: none"> Quarterly stakeholder meetings. Co-facilitate, with MHPL and PIU, monthly community meetings with directly impacted communities. 	<ul style="list-style-type: none"> Maintain relationships with district authorities based constructive dialogue. Inform district authorities of current and planned activities and activities schedule. Inform local authorities of development opportunities, including employment, skills training, and development projects. 	<ul style="list-style-type: none"> Monthly: Community meetings (district officers co-facilitate these meetings) Quarterly: Stakeholder meetings 	<ul style="list-style-type: none"> Prior notification of Project activities to be undertaken in District; District to inform Traditional Authorities and Group Village Heads in accordance with protocol. Up-to-date information on current and planned project activities (including resettlement). Report on stakeholder engagement activities undertaken and issues arising in preceding week and/or month and/or 	<ul style="list-style-type: none"> Written meeting requests. Attendance registers. Photographs of meeting participants, with permission. Minutes of meetings. List of action items arising from meetings. Written requests 	<ul style="list-style-type: none"> MHPL PIU

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		<ul style="list-style-type: none"> Involve local authorities in communicating project information, activities, and opportunities (employment, training, community development projects) to their communities. 		quarter. <ul style="list-style-type: none"> Report on Project grievances recorded, under investigation, and resolved during preceding week and/or month and/or quarter. Invite to participate in Grievance Mediation Committee meetings, as and when required. Consult for specific information and/or support needs. Monthly report on any GBV/SHEA incidents recorded by and referred to GBV/SHEA service provider. Inform immediately of any community health and safety and/or environmental incidents. Follow-up on action items 	for technical or other support required from urban government authorities. <ul style="list-style-type: none"> Store records on central server 	

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
				arising from previous engagements with DCs.		
	<p><i>Indirectly Impacted Districts:</i></p> <ul style="list-style-type: none"> Quarterly stakeholder meetings. Co-facilitate, with MHPL and PIU, as required community meetings with indirectly impacted communities. 	<ul style="list-style-type: none"> Maintain relationships with district authorities based constructive dialogue. Inform district authorities of current and planned activities and activities schedule. Inform local authorities of development opportunities, including employment, skills training, and development projects. Involve local authorities in communicating project information, activities, and opportunities (employment, training, community development projects) to their 	<ul style="list-style-type: none"> As required. Biannual: Community meetings 	<ul style="list-style-type: none"> Prior notification of Project activities to be undertaken in District; District to inform Traditional Authorities and Group Village Heads in accordance with protocol. Up-to-date information on current and planned project activities (including resettlement). Biannual report on any GBV/SHEA incidents recorded by and referred to GBV/SHEA service provider. Inform immediately of any community health and safety and/or environmental incidents. 		

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		communities.				
NGOs and CBOs	<ul style="list-style-type: none"> Quarterly stakeholder meetings Project communication media: MHPP Quarterly Newsletters, brochures, etc. Project website 	<ul style="list-style-type: none"> Establish and maintain constructive relationships. To inform and strengthen the project's E&S performance. Build and maintain trust in the credibility of the Project by communicating in a transparent and accurate manner. Provide a platform for NGOs to raise potential issues the project might not be aware of. Provide information on current and planned project activities, including resettlement, stakeholder engagement and consultation activities, as well as stakeholder questions, comments, 	<ul style="list-style-type: none"> Quarterly As required 	<ul style="list-style-type: none"> Up-to-date information on current and planned project activities (including resettlement). Biannual report on any GBV/SHEA incidents recorded by and referred to GBV/SHEA service provider. Inform immediately of any community health and safety and/or environmental incidents. 	<ul style="list-style-type: none"> Written meeting requests Attendance registers Feedback register Grievance register Minutes of meetings Photographs of meeting participants, with permission Action tracker: List of action items arising from meetings Store records on central server 	<ul style="list-style-type: none"> MHPL PIU

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		concerns, and complaints. <ul style="list-style-type: none"> Share information on potential Project risks and impacts and associated mitigation and management measures. Familiarise with Project GRM and SEP. Familiarise with Project GBV/SHEA management procedure. 				
Other hydropower facilities in the Project area	<ul style="list-style-type: none"> Quarterly stakeholder meetings. Ad hoc meetings. Project website 	<ul style="list-style-type: none"> Identify potential MHPP impacts and management mechanisms on these hydropower schemes. Provide information on current and planned project activities. Share information about issues and suggestions for resolutions. Identify ways in which hydropower facilities 	<ul style="list-style-type: none"> Quarterly As required 	<ul style="list-style-type: none"> Objectives of meeting. Project activity updates and schedules. Recommendations for collaboration. Information on Project community development plan. Issues and topics for discussion. 	<ul style="list-style-type: none"> Written meeting requests Attendance registers Feedback register Grievance register Minutes of meetings Photographs of meeting participants, with 	

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		<p>could collaborate to increase development impacts.</p> <ul style="list-style-type: none"> Identify potential cumulative impacts arising from concurrent hydropower activities. Information-sharing on community development plans (successes and lessons learned), on reputable local suppliers, and skills training and capacity building organisations. Inform of Project GRM and GBV/SHEA management procedure. 			<p>permission</p> <ul style="list-style-type: none"> Action tracker: List of action items arising from meetings Store records on central server 	
Public, Private and PPP Entities and Programmes in the	<ul style="list-style-type: none"> Quarterly stakeholder meetings Ad hoc meetings 	<ul style="list-style-type: none"> Identify potential MHPP impacts and management mechanisms on these entities and programs. Provide information on 	<ul style="list-style-type: none"> Quarterly As required 	<ul style="list-style-type: none"> Objectives of meeting. Project activity updates and schedules. Recommendations for collaboration. 	<ul style="list-style-type: none"> Written meeting requests Attendance registers Feedback register 	<ul style="list-style-type: none"> MHPL PIU

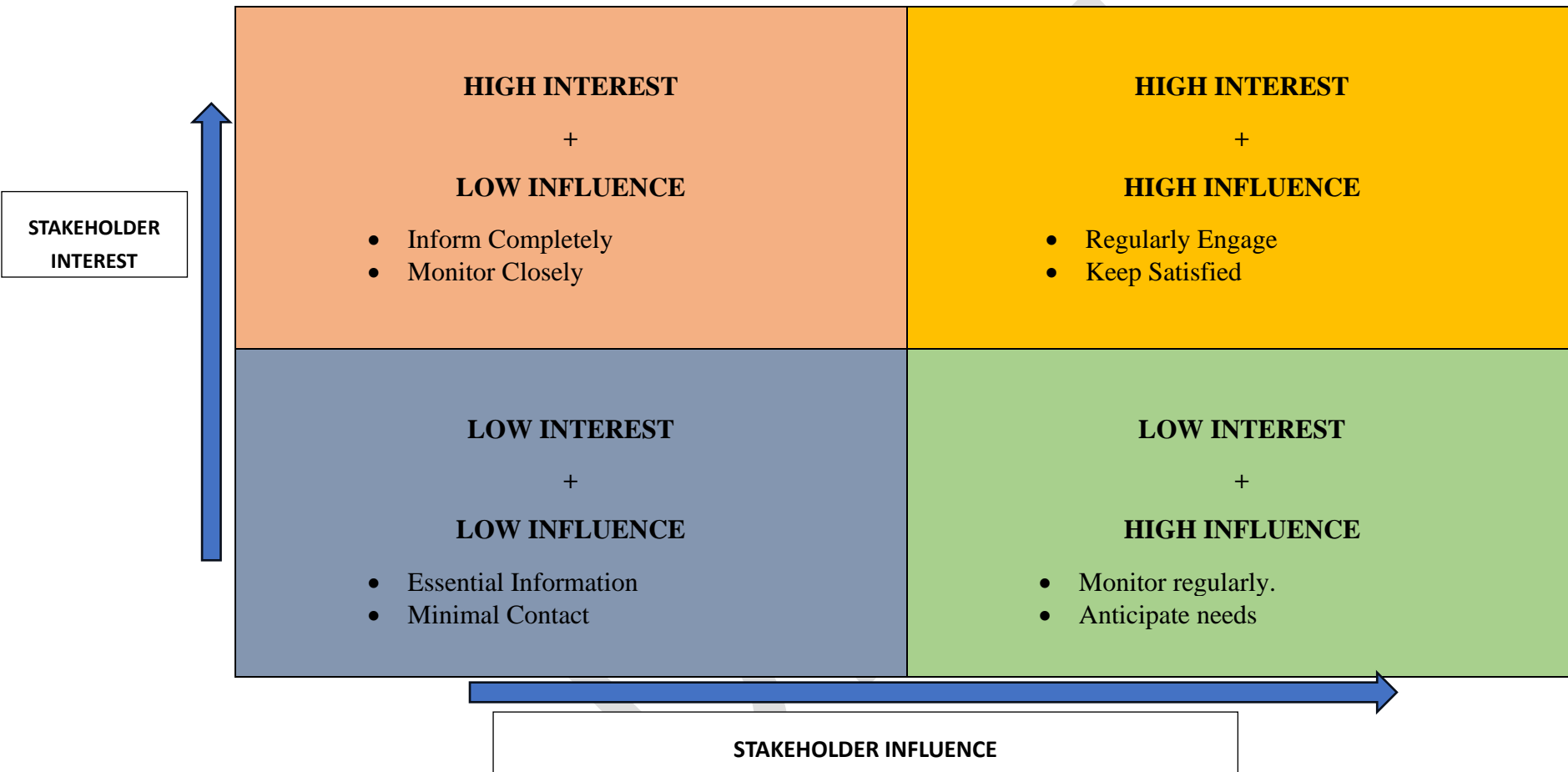
Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
Project Area		current and planned project activities. <ul style="list-style-type: none"> • Share information about issues and suggestions for resolutions. • Identify possibilities for collaboration to increase development impacts. • Identify potential cumulative impacts arising from concurrent activities. • Information-sharing on community development plans (successes and lessons learned), on reputable local suppliers, and skills training and capacity building organisations. • Inform of Project GRM and GBV/SHEA management procedure. 		<ul style="list-style-type: none"> • Information on Project community development plan. • Issues and topics for discussion. 	<ul style="list-style-type: none"> • Grievance register • Minutes of meetings • Photographs of meeting participants, with permission • Action tracker: List of action items arising from meetings • Store records on central server 	
Public	<ul style="list-style-type: none"> • Quarterly 	<ul style="list-style-type: none"> • Publicise Project-related 	<ul style="list-style-type: none"> • Quarterly 	<ul style="list-style-type: none"> • Overall Project description, 	<ul style="list-style-type: none"> • Records of 	Ministry of

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
Media: Newspapers	<p>publications in selected newspapers</p> <ul style="list-style-type: none"> As required 	<p>information: Overall Project description; Project updates, including Quarterly Newsletter; Project GRM; Project GBV/SHEA management procedure.</p> <ul style="list-style-type: none"> Publicise procurement and employment opportunities. Publicise Project's community development initiatives and programs. 	<ul style="list-style-type: none"> As required 	<p>including benefits to Malawi and its citizens.</p> <ul style="list-style-type: none"> Project GRM. Project GBV/SHEA management procedure. Project updates: Progress, activities, timelines. Project community development initiatives. Project access points: Telephone numbers, website, Blantyre office address. 	<p>correspondence with newspapers.</p> <ul style="list-style-type: none"> Copies of publications Store records on central server 	<p>Energy in coordination with MHPL</p>
International Lenders	<ul style="list-style-type: none"> Quarterly Project reports As required 	<ul style="list-style-type: none"> Report on Project progress. Report on stakeholder engagement activities. Report on GRM. Report on GBV/SHEA management procedure. Report on any issues and 	<ul style="list-style-type: none"> Quarterly As required 	<ul style="list-style-type: none"> Updates on Project progress and activities: Technical and E&S. Report on SEP implementation using key indicators. Report on GRM using key indicators. Identify issues and risks, if 	<ul style="list-style-type: none"> Records of correspondence (email, letters) Records of reports and accompanying documentation Store records on central server 	<ul style="list-style-type: none"> MHPL PIU

Stakeholders	Engagement Method	Objective of Engagement	Frequency	Key Messaging	Records of Engagement	Responsible
		risks. <ul style="list-style-type: none"> • Request technical, incl. E&S, where required. 		applicable		

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6.3. Planning for Additional Engagement Activities

There are likely to be instances where additional, targeted stakeholder engagement is required over and above the engagement methods and processes described in this SEP. Examples of circumstances requiring additional stakeholder engagement activities not covered by this SEP include, but are not limited to:

- Stakeholder engagement relating to public disclosure of the Project’s ESIA and/or ESMP.
- Stakeholder engagement related to land acquisition and involuntary resettlement.
- Any other unforeseen events requiring engagement with external stakeholders at national, regional, district, group village, or village level.

Any additional stakeholder engagement activities will need to be planned, implemented, and reported on in accordance with the general principles outlined in this SEP. This includes the requirement that engagement **consider the needs of vulnerable persons and groups**.

Specific steps to be undertaken in respect of planning, implementing, and reporting on additional stakeholder engagement activities are outlined in **Error! Reference source not found..**

Table 6-3: Requirements for Additional Stakeholder Engagement Activities

Action	Description
Identify party (ies) responsible for undertaking engagement	E&S Management Unit, PIU, or an external party (e.g., a consultant).
Responsible party compiles an Action Plan describing planned engagement activities and procedures	Error! Reference source not found. but should include specific dates where applicable. The inclusion of record-keeping/ reporting methods is essential.
E&S Management Unit approves the Implementation Plan	E&S team members review the Action Plan, and the responsible party must address any comments prior to the plan being approved.
Records of completed engagement activities and outcomes are submitted to the E&S Management Unit	Record-keeping and reporting on completed stakeholder engagement must be undertaken in terms of the methods and procedures stipulated in the approved Action Plan.
Records of completed engagement are incorporated into the Project’s stakeholder information management system	More detail on the Project’s stakeholder engagement information management system is provided in Section Error! Reference source not found..

7. Grievance Management

The Mpatamanga Project recognises the importance of establishing a robust and culturally appropriate grievance mechanism to meet GIIP requirements, prevent and address stakeholder concerns and grievances about the Project's social and environmental performance, reduce Project risks and enhance Project benefits, and establish and maintain social licence to operate.

The MHPP Grievance Redress Mechanism (GRM) Procedure has been developed to receive and address concerns and complaints related to all Project phases: Development studies; Early Civil Works (ECW); Construction; Commissioning; Operational; and Decommissioning.

It will evolve and improve based on stakeholder feedback as well as other monitoring and evaluation activities regularly undertaken by MHPL, GoM PIU and Lenders.

7.1. Introduction to the MHPP Grievance Redress Mechanism (GRM)

The MHPP seeks to build strong stakeholder relationships and manage the impact of its activities on host communities. It recognises however that grievances related to its activities may sometimes occur.

The MHPP Grievance Redress Mechanism (GRM) facilitates stakeholders to raise questions or concerns to the MHPP and have them addressed in a prompt and respectful manner. The MHPP aims to address all grievances received, whether they stem from real or perceived issues.

Any stakeholder who considers themselves affected by the MHPP's activities will have access to the MHPP GRM at no cost. The statutory rights of any complainants to undertake legal proceedings remain unaffected by participation in the MHPP GRM process.

The MHPP seeks to foster trust in the GRM process and its outcomes. It will therefore communicate the MHPP GRM in an understandable manner to affected stakeholder groups. Confidentiality will be respected and the MHPP will take all reasonable steps to protect parties to the process from any retaliation that may occur due to complainants' decision to use the MHPP GRM to resolve a grievance.

Grievances could arise with regards to any aspect of the Project, including but not limited to the following:

- Measurement of land and other assets for communities that are to be directly affected;
- Changes in access to natural resources e.g. rivers, forest etc;
- Potential impacts on farming, fishing, and other livelihoods;
- Proposed compensation and other support measures;
- Proposed resettlement sites and housing options;
- Changes in water and air quality;
- Impacts on cultural or religious sites;

- Confusing or insufficient information about the Project;
- Potential impacts to roads, schools, or other infrastructure.

Any person, or group, can make a complaint and the issue will be handled with respect. A grievance can be defined as an actual or perceived problem that might give grounds for complaint.

Grievances received will be acknowledged within 7 days. The action/s to be taken to address the grievance/s raised will be communicated to the complainant within 30 days of receiving the grievance.

The current pilot procedure for processing grievances is summarised below. Adaptations will be made on a regular basis to ensure the GRM remains effective and efficient for all users.

What is the purpose of a GRM?

Community Side

- To give to all community members, regardless of age, gender, ethnicity, religion, and ability, the opportunity to express their concerns and provide any specific suggestions for improvements.
- To support men, women, and youth within local communities to identify actual and potential impacts of a Project to achieve a common understanding about Project activities.

Developer Side

- To support Project developers to understand and address concerns of local communities.

Outcomes

- Local communities, the Project developers, and local authorities listen to and help each other to identify, understand, and prevent potential issues related to a Project.
- Local communities, the Project developers, and local authorities collaborate to maximise the benefits of a Project. Community concerns and complaints are resolved in a timely and respectful manner based on practical solutions agreed between local communities, Project developers and local authorities.

7.2. Channels or Access Points for Raising a Grievance

The MHPP GRM Procedure considers communities' literacy levels and focuses on in-person interaction with complainants using Chichewa, and/or other relevant local languages, in addition to English; to ensure that processes, decisions, and outcomes are clearly understood.

There are a number of "channels", or access points, which can be used by community members and other stakeholders to submit feedback – questions, comments, concerns and/or complaints – regarding the MHPP. These are summarised in the table below.

Table 7-1: Channels or Access Points for Providing Feedback

Modality	Access Point
<ul style="list-style-type: none"> In person: 	<ul style="list-style-type: none"> to a GoM PIU or MHPL representative; e.g. during their visits to local communities. at regular MHPP stakeholder engagement meetings; for example MHPP Monthly Community Engagement Meetings and Quarterly Stakeholder Engagement Meetings. at the GoM PIU (Ministry of Energy office in Lilongwe) or MHPL (Blantyre + Site offices): <ul style="list-style-type: none"> Ministry of Energy, 2nd floor, Capital House, City Center, Lilongwe 3. MHPL Addresses: <ul style="list-style-type: none"> <u>Headquarters</u>: 16, 17 and 18 on First Floor, Almira Complex at Plot Number BC1114, Mandala, Blantyre. <u>Site Office</u>: S137, near Main Dam site, Blantyre District. to Village focal points; specifically, members of MHPP Group Village Grievance Redress Committees (GVGRCs).
By phone (call, SMS, WhatsApp):	<ul style="list-style-type: none"> to GoM PIU: +265 1 770 688. to MHPL: 4265 (Toll Free Number) or 0886 595 369 (Airtel) or 0886 595 369 (TNM). to members of MHPP Group Village Grievance Redress Committees (GVGRCs).
<ul style="list-style-type: none"> In writing: 	<ul style="list-style-type: none"> by placing a completed GRM Form or written letter in an MHPP Suggestion Box. These are currently located in directly impacted villages in Blantyre and Neno Districts. Each Box is held by a GVGRC member however boxes are opened by MHPL Grievance Officers; for reasons of confidentiality. By email to the GoM or MHPL: <ul style="list-style-type: none"> GoM Email: info@energy.gov.mw MHPL Email: info@mpatamangahydro.com By mail to the GoM or MHPL: <ul style="list-style-type: none"> GoM Postal Address: Ministry of Energy, Private Bag 309, Lilongwe 3, MALAWI. MHPL Postal Address: P.O. Box 886 Blantyre, MALAWI. Via the GoM or MHPL websites: <ul style="list-style-type: none"> GoM website: www.energy.gov.mw MHPL website: www.mpatamangahydro.com to Village focal points and/or other members of MHPP GVGRCs.

All community and stakeholder feedback received through the above channels or access points is screened to determine the appropriate management procedure:

- **Grievances:** Referred into the MHPP grievance redress mechanism;
- **Incidents:** Directed to the MHPL HSSE incident management procedure. If this incident affects a member/s of the public, it should also be recorded as a complaint under this procedure and be investigated and resolved accordingly;
- **Gender Based Violence (GBV) and Sexual Harassment, Exploitation and Abuse (SHEA):** Non-Project-related GBV and SHEA incidents to be referred into the GBV management procedure. If this incident affects a member/s of the public, it should also be recorded as a complaint under this procedure and be investigated and resolved accordingly; and
- **Questions, comments, or concerns (QCC):** Referred into the QCC management process.

Community and stakeholder feedback received through listed channels/access points will be reviewed to identify general stakeholder concerns that should be addressed through ongoing engagement.

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7.3. Overview of MHPP Pilot GRM Procedure

The figures below summarise the MHPP Pilot GRM Procedure. One summarises the GRM Procedure as a whole and the other shows the stakeholder/community interface with the MHPP GRM Procedure. These figures will be revised, as needed, to address feedback from GRM users and other Project stakeholders.

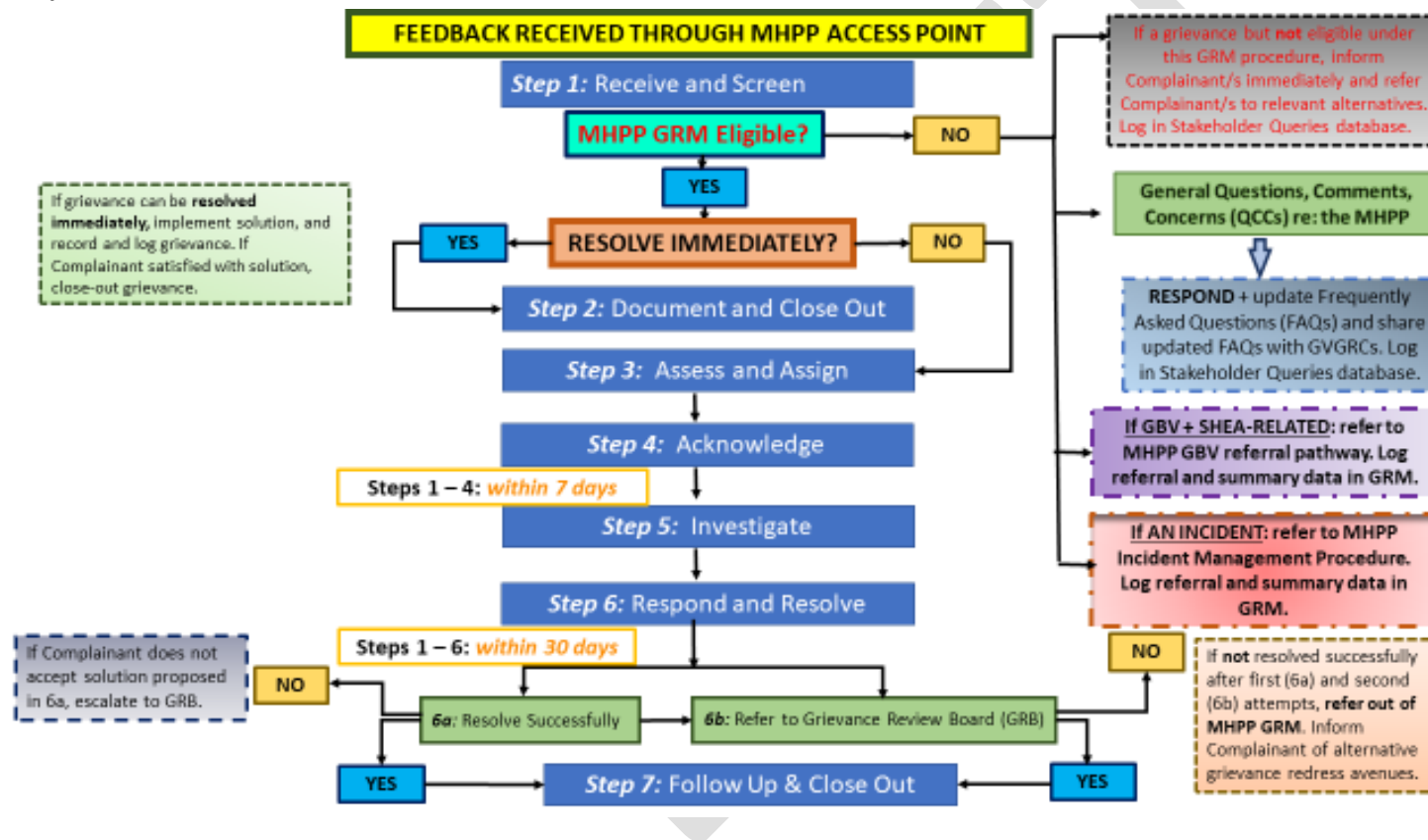


Figure 4: Summary of MHPP Pilot GRM Procedure

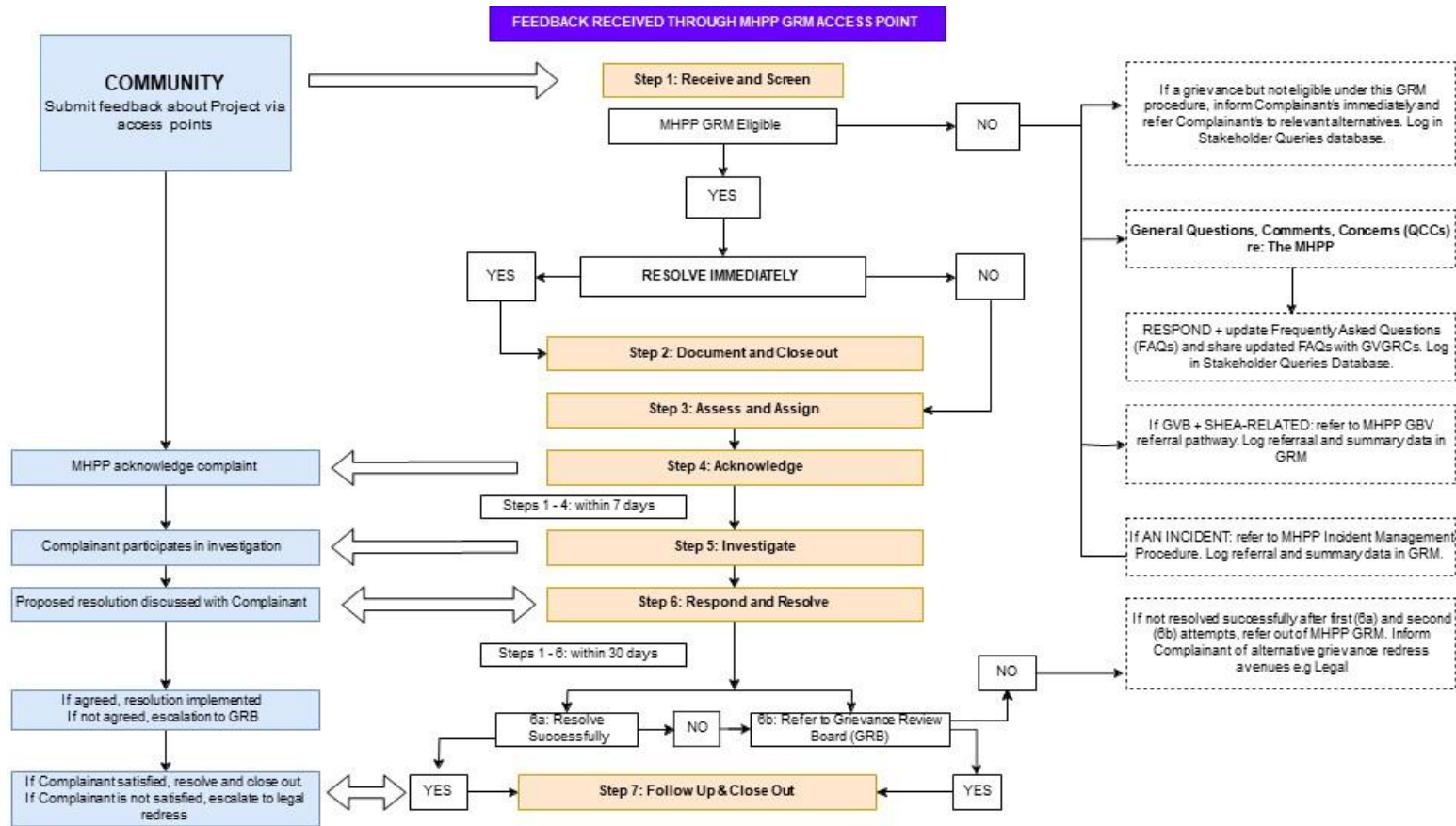


Figure 5: Community/Stakeholder Interface with MHPP Pilot GRM Procedure

7.4. Role of Group Village Grievance Redress Committees

7.4.1. Standard Composition of GROUP Village Grievance Redress Committees – (GVGRC)

Group Village Grievance Redress Committees (GVGRCs) are being formed under the Project at a Group Village Headman (GVH) level in directly impacted communities in proximity to Project infrastructure. These will act as the first tier of grievance redress to resolve grievances which may emanate at the community level during the Project cycle. The GVGRC members shall appoint a chairperson and a secretary. The committees shall consist of the following members:

- Village Head.
- Village Development Committee (VDC) representative (or equivalent)⁵.
- Natural Resources Management Committee (NRMC) member.
- Child Protection Officer.
- Community Policing representative.
- Women’s representative.
- Youth representative.
- Project-Affected Person (PAP) – male.
- Project-Affected Person (PAP) – female.
- Extension worker (representative of District Council).
- Religious organisations’ representative/s (from religious group/s active within the community).

7.4.2. Roles and Responsibilities of GROUP Village Grievance Review Committees

GVGRC roles and responsibilities include but are not limited to:

- ‘Channel’ or ‘Access Point’ for receipt of Project-related feedback from affected communities.
- Receive and screen community queries, concerns, complaints and grievances in accordance with the screening processes outlined in the MHPP GRM. This includes:
 - Referring all incidents and emergencies, and gender-based violence (GBV) and sexual exploitation and abuse (SEASH) issues immediately to the nominated pathways; and
 - Referring grievances that are not within the jurisdiction of the Committee and/or the MHPP GRM to the appropriate authority.
- Address community queries and potential grievances immediately where possible; using information documented in MHPP Frequently Asked Questions (FAQs).
- Record grievances in a MHPP Grievance Registration form, when requested by a Complainant.

⁵ It is understood that all VDCs have recently been disbanded.

- Sensitise affected communities about the MHPP GRM and the GVGRC roles and responsibilities related to the GRM.
- As required, assist in the investigation and resolution of grievances related to the MHPP.
- Participate in MHPP Grievance Review Board (GRB) meetings, only as required and only those members whose community role is relevant to the specific category of grievance being reviewed.
- Distribute official MHPP GRM contact cards and other official GRM awareness-raising materials, as required. E.g. Project Newsletters, Project Brochures, GRM IEC materials etc.
- (For Chairperson):
 - Store and manage safety of MHPP Suggestion Box.
 - Advise when additional Suggestion Boxes and/or GRM information education communication (IEC) materials are required.
 - Compile two weekly logs: i) a Community Feedback Log; ii) a Grievance Log that summarise information provided immediately by GVGRC members to address community queries and potential grievances.
 - Meet weekly with MHPL Grievance Officers and/or Community Liaison Officers to:
 - Provide MHPP weekly community feedback and grievance logs.
 - Provide completed MHPP grievance redress forms.
 - Open the Suggestion Boxes and provide the completed forms or other feedback to the MHPL Grievance Officer and/or MHPL Community Liaison Officer to take and screen.

GVGRC members will be invited to MHPP monthly/regular community meetings jointly undertaken by GoM PIU and MHPL (*alongside PAPs and other community members*).

GVGRC members will be provided with:

- Initial induction/orientation training program.
- Quarterly capacity building program/activities.
- A monthly data allowance provided direct to their phones.
- MHPP T-shirts, Reflector Vests and MHPP caps. Other MHPP ‘collateral’ may also be provided.
- Copies of MHPP GRM Forms, Community Feedback templates and Grievance Log templates.

7.5. Current Locations of MHPP Suggestion/GRM Boxes

Twenty-two MHPP Suggestion/GRM Boxes have been distributed throughout the villages in Blantyre and Neno Districts in proximity to the Main Project areas. Additional MHPP Suggestion/GRM Boxes will be distributed in relevant locations as and when necessary.

Figure 6 over the page summarises the current locations of the MHPP Suggestion/GRM Boxes.

Then, Table 7-2 provides contacts of GVGRC Chairpersons and Suggestion/GRM Box Custodians.

7.5.1. Contacts of GVGR Chairpersons and Grievance Box Custodians

Table 7-2: Contacts of GVGR Chairpersons and Grievance Box Custodians

Group Village Head	Box custodian	Contact details	Gender	Village/Location of suggestion box	Villages represented by suggestion box
GVH Kaliyati	Paul Black	0889994030	M	Chaswanthaka Village	Chaswanthaka
	Annie Thomasi	0897187175	F	Inosi Village	Inosi Village
	Sungani John	0880775564	M	Mpindo Village	Mpindo Village
	Chikondi Mapemba	0883989675	M	Lisangwi Village	Lisangwi and Chilaulo Village
GVH Kaliati Sub Committee	Joseph Donasiyani	08885121094	M	Mbwinja	Mbwinja Village
	Right Winston	N/A	M	Divala	Divala
	Eunice Malitino	0883699972	F	Mbwinja	Mbwinja, Anyada and Apatso villages
	Veronica Bwande	0881156154	F	Mbwinja	Mbwinja village
GVH Namputu	Albert Alfred	0883594068 0997501883	M	Chinkwinya Village	Chinkwinya and Chimphanda 1 Villages
	Eliza Salifu	0882481244	F	Namputu Village	Namputu, Chikila 2 and Chimphanda 2 Villages
	Mercy Gulo	0882926121	F	Chikila Village	Chikila and Mwazilinga Village
GVH Felemu	Joseph Decks	0884026650	M	Felemu Village (Chimbamira Catholic primary school)	Felemu, Jana, July, Fisi and Chalenga Village
	Kanyebele Jolium	0887511564	M	Felemu Village	Felemu and Kambalame Village
	Grant Paulo	0887351226	M	Kambalame Village	Kambalame Village
GVH Felemu Sub committees	June Chimpesa	Contact details	M	Nkhwali Village	Nkhwali Village
	Linnes Lusaka	0889994030	F	Nkhwali Village	Nkhwali Village
GVH Nsalawatha	Henry Banda	0897187175	M	Jonathan Village	Jonathan, Chikaya and Liwonde Village
	Davis Banda	0880775564	M	Nsalawatha Village	Nsalawatha and Liyenda Village
GVH Ngwenyama	Chrissy Phiri	0883989675	F	Mbemba Village (Mbemba Clinic)	Mbemba Village
	Anne Phiri	08885121094	F	Mkoka Village	Nkoka Village
	Isaac Moses Adamson	N/A	M	Joseph 1 Village (Lisungwi farms)	Joseph 1 Village
	Ellison Mbitchana	0883699972	M	Joseph 2 Village	Joseph 2 Village

7.6. Key Definitions relevant to the Pilot MHPP GRM Procedure

Table 7-3 below summarises key definitions relevant to the Pilot MHPP GRM Procedure.

Table 7-3: Key Definitions relevant to the Pilot MHPP GRM Procedure

Term	Definition
Access Point	A method for submitting/filing/raising grievances to the Mpatamanga Hydro Power Project (MHPP).
Community	A group of people who share a common sense of identity and interact with one another on a sustained basis.
Complainant	An individual, group or organisation that submits a grievance to the MHPP.
Complaints	A formal expression of discontent concerning MHPP actions, including by MHPP Contractors, raised by one or more stakeholders. Same as 'concern', 'grievance' 'issue'.
Concern	A formal expression of discontent concerning MHPP actions, including those by MHPP Contractors, raised by one or more stakeholders. Same as 'complaint', 'grievance' 'issue'.
Contractor	An individual or company that has entered into a contract to provide goods or services to the MHPP; either with Mpatamanga Hydro Power Limited (MHPL) or the Government of Malawi (GoM). The term covers parties directly contracted by MHPL or the GoM and those contracted by Contractor companies, known as subcontractors.
Gender-based violence (GBV)	Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.
Grievance	An expression of dissatisfaction with the MHPP typically referring to a specific source of concern and/or seeking a specific solution. Same as 'complaint', 'issue', 'concern'. <i>Note: A question or request is NOT treated in the same way as a grievance (questions and requests are addressed through regular, ongoing stakeholder engagement activities).</i>
Grievance Management Form	A form used to capture information about an incoming grievance (<i>also known as 'Grievance Form'</i>).
Grievance Redress Mechanism	A process for receiving, investigating, responding to and closing out grievances or concerns from affected communities and other stakeholders in a timely, fair and consistent manner. <i>Also known as 'GRM'.</i>
GRM	See Grievance Redress Mechanism.
Incident	An Incident is a collective term including accident, work-related illness, security incident, environmental incident, community relations incident and near-miss event. An Incident is a single event or continuous/repetitive series of events that result or have the potential to result in a negative impact on people (employees, contractors, community

Term	Definition
	members, and visitors), the environment, operational integrity, security, assets, communities, process, product, legal liability and or reputation.
Issue	A formal expression of discontent concerning MHPP actions, including those by MHPP Contractors, raised by one or more stakeholders. Same as ‘complaint’, ‘grievance’ ‘concern’.
MHPP GRM Database	A database for maintaining information about grievances received including measures taken to resolve grievances and close them out.
Project Affected Person	Any person affected by the implementation of the Project <u>and</u> physically or economically impacted by the Project land acquisition undertaken in accordance with the Project’s Environmental, Social, Labour, Security and Occupational Health and Safety (ESHS) Requirements.
Resolution	Actions taken to resolve a grievance; for example, apologies, restitution, rehabilitation, financial and non-financial compensation and/or punitive sanctions. Same as ‘remedy’.
Responsible Party	A party that has formal, acknowledged responsibility for a subject matter area or topic. The Responsible Party is responsible for ensuring a grievance is resolved, but may draw on others to support the grievance resolution process.
Sexual Exploitation and Abuse	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys and men can experience Sexual Exploitation and Abuse (SEA). In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.
Sexual Exploitation, Abuse and Sexual Harassment	Spans the topics of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). See SEA and SH definitions.
Sexual Harassment	Unwelcome sexual advances, requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature. Sexual Harassment (SH) differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH.
Stakeholder	Individuals or groups who can affect, or are affected by, or who have a legitimate interest in the MHPP’s performance. Stakeholders can include, but are not limited to: affected communities, government authorities and officials, customary authorities and representatives, investors, civil society organisations (CSOs), non-government organisations (NGOs), community based organisations (CBOs), media, contractors including service providers, development partners, financial institutions (lenders), legislative and regulatory authorities.

8. MHPP E&S Organisation

8.1. MHPL Environmental and Social Management Unit (ESMU)

MHPL has established a dedicated Project Environmental and Social Management Unit (ESMU), led by the E&S Manager, comprising suitably qualified and experienced staff to provide environmental, social, health, safety, security, resettlement and biodiversity management capacity throughout the Project's planning, construction, commissioning, and operation phases. The E&S Manager will coordinate and collaborate with the various functions to ensure effective implementation of the ESMS, that includes the SEP and GRM, and will report directly to the Project Director.

As the Project progresses, resource requirements shall vary in line with implementation demands. MHPL will continue to allocate the necessary management, human, and financial resources to ensure the ESMS and its associated plans, including the SEP and GRM, and commitments are effectively implemented and managed throughout the Project lifecycle.

Resources recruited to date that are involved in the day to day planning and management of MHPP stakeholder engagement and grievance redress management activities include: Consultation and Stakeholder Engagement Coordinator, Community Liaison Officers (CLOs), and Grievance Officers.

8.2. GoM Project Implementation Unit (PIU)

The GoM established an Environmental and Social Government Team (ESGT) in the Project Implementation Unit (PIU) to provide technical, environmental, and social support to the Government of Malawi during the development, construction, and operation phases of the Project. The ESGT consists of seconded social and environmental experts from relevant Ministries, Departments, and Agencies (MDAs) as well as an Environmental Specialist and a Social Risk Safeguards Specialist appointed as consultants. Key MDAs represented in the PIU are the Department of Energy, Department of Environment (MEPA), Department of Lands, Ministry of Local Government, and Ministry of Education.

Reporting to the Project Implementation Unit (PIU) Coordinator, the ESGT works to ensure the MHPP is planned, designed and built according to the World Bank Policies and Performance Standards, World Bank Good Practice Notes and EHS Guidelines; Good International Industry Practices (GIIP). The project will also comply with applicable Malawi regulations⁶ and with international standards and best practice from the hydropower sector.

The ESGT ensures stakeholders are consulted and their views incorporated in ESS tools in line with the Project SEP, which incorporates the public participation requirements stipulated by the EMA of 2017 as well as the P-SEP-P framework. It ensures gender and disadvantaged/vulnerable group considerations are incorporated in E&S Safeguards documents.

⁶ Relevant to the project such as Labour, Occupational Health and Safety, land, access of information, grievance redress, Environmental Impact Assessment, waste management, mining and blasting, water, health, forest, wildlife, wetlands, biodiversity, protected areas, among others.

The ESGT is supported by a Panel of Experts for Environmental and Social Management (PoE-ESM) that has been formed as required by the WB ESF. The PoE-ESM shall be maintained throughout the construction phase as well as for one year subsequent to the commencement of the operation phase to ensure environmental and social issues are resolved and no legacy issues remain, particularly with respect to the affected communities and their livelihoods.

8.3. Capacity Building and Training for SEP implementation

To ensure effective implementation of the SEP, capacity-building and training will be provided to MHPP personnel responsible for the activities related to SEP implementation as well as to members of the Village Grievance Redress Committees (VGRCs) who have been elected to support the implementation of the Project GRM and manage Project feedback from affected communities.

The CLOs will receive the following capacity-building and training:

- Good International Industry Practice (GIIP) requirements and standards underpinning the SEP.
- Principles for establishing constructive and positive relationships with affected communities.
- Identifying and following relevant cultural protocols.
- Facilitating community and other stakeholder meetings.
- Recording engagements, including attendance registers, minutes of meetings, Feedback Registers, Action Trackers, Daily Field Reports, and others, as required.
- Eliciting and regarding stakeholder data using qualitative and quantitative methods, specifically, for developing Village Profiles (including vulnerability data).
- Identifying and reporting issues and risks.
- Managing expectations.
- Project Grievance Redress Mechanism.
- Project GBV/SHEA management procedure.
- HSSE incident reporting.

The Grievance Officer will receive the following capacity-building and training:

- Good International Industry Practice (GIIS) requirements and standards underpinning the SEP.
- Principles for establishing constructive and positive relationships with affected communities.
- Identifying and following relevant cultural protocols.
- Implementing the Project GRM, including receiving, recording, and support in investigating, tracking and responding to grievances received by the Project.
- Receiving, recording, responding to and tracking all Project-related feedback, including questions, comments, concerns, and complaints.
- Managing expectations.
- Working effectively with VGRC members.
- Project GBV/SHEA management procedure.
- HSSE incident reporting.

The Village Grievance Redress Committee (VGRC) members, who support the implementation of the GRM as well as sharing approved Project information with affected communities, will be provided with the following capacity-building and training:

- Receiving, recording, and responding to, where appropriate, to Project-related feedback, including questions, comments, concerns, and complaints.
- Supporting implementation of the Project GRM, including receiving, registering, support in investigating, and responding to, where appropriate, grievances received by the Project.

Supporting Project GBV/SHEA management procedure, especially the GBV/SHEA champions that will be identified among VGRC members.

9. Stakeholder Engagement Management System

9.1. Roles and Responsibilities for MHPP SEP Implementation

Roles and responsibilities relevant to SEP implementation are presented in **Error! Reference source not found..**

Table 9-1: MHPL and PIU Roles and Responsibilities for SEP

Role	Responsibility
MHPL ESMU: E&S Manager	Accountable for the implementation of the Project SEP.
MHPL ESMU: Social Lead	Responsible for overseeing MHPL components of SEP implementation.
MHPL ESMU: Consultation and Stakeholder Engagement Coordinator	Responsible for managing MHPL components of SEP implementation.
MHPL ESMU: CLOs and Grievance Officers	Engaging with Project-affected communities regularly, as per the engagement schedule specified in the CSE (see Section Error! Reference source not found.) by establishing a site presence in the affected communities, attending community meetings, implementing the grievance mechanism, and recording and responding to questions, comments and concerns about the Project.
GoM PIU: Social Specialist	Ensure stakeholders are consulted and their views incorporated in the ESS instruments and tools in line with the Project SEP. Coordinate and manage GoM responsibilities for Project SEP implementation.

Role	Responsibility
Joint Responsibilities (MHPL/PIU)	
ESMU PIU	Joint Responsibilities (MHPL/PIU)
	<p>Responsible for the overall implementation of this SEP. This includes attending all stakeholder meetings, presenting Project information, including Project updates, potential social and environmental impacts, the Project GRM, and any other Project information. Responsible for implementation of the GRM (see Error! Reference source not found.). Informing MHPL and PIU management of issues and risks identified during engagement activities and providing support in managing GRM, assigning responsible parties for grievance resolution, monitoring the management of grievances, and suggesting changes to policies or practices based on lessons learned.</p>
	MHPL Responsibility
	<p>MPHL is responsible for developing accurate and up-to date messaging regarding the Project and for ensuring the content and format of the messaging is appropriate for the Project's different stakeholder groups.</p> <p>For Project-related meetings, MHPL is responsible for: Producing and distributing meeting agendas; compiling attendance register, recording minutes of meetings, capturing photographs and/or video footage (with the permission of participants), and archiving all stakeholder records in a central storage platform.</p>
	PIU Responsibility
<p>The PIU is responsible for scheduling and coordinating all stakeholder engagements outlined in the CSE and Stakeholder Engagement Implementation Plan (see Section Error! Reference source not found.), including monthly community meetings with directly affected communities and quarterly stakeholder meetings with other key Project stakeholders.</p> <p>The PIU is also responsible for reviewing all Project-related messages developed by MHPL and for supporting the MHPL engagement team in presenting Project messages during the scheduled meetings. The PIU is responsible for recording minutes of meetings / meeting reports on behalf of the GoM and submitting these to MHPL within 3 weeks of a meeting.</p>	

Role	Responsibility
Group Village Grievance Redress Committee (GVGRC)	Elected committees operate as focal points at the Group Village level representing the villages directly impacted by the Project. VGRC members are responsible for receiving feedback about the Project, whether in-person or via the Suggestion boxes. The members are also responsible for screening the feedback and responding accordingly: Referring complaints and grievances to the grievance management process; responding to questions, comments, and concerns addressed in the official Project Frequently Asked Questions (FAQs) brochure; recording and escalating to MHPL CLOs the questions, concerns and concerns that they cannot respond to, and referring Gender-Based Violence (GBV) issues, and Incidents, to the appropriate management procedure. VGRC members will attend all Project-related community meetings and be asked to share official Project-related messages (brochures, posters etc.) within the communities that they represent.

9.2. Information and Data Management

A data management system will be developed to capture and track relevant data on stakeholders, engagement activities, and grievances.

An *MS Excel Stakeholder Engagement Database* has been developed and includes the following:

- A Stakeholder Register:
 - Relevant information on individual, community, and organisational stakeholders.
- An Engagement Activities Register:
 - Record of all stakeholder engagements activities undertaken (including type of engagement, date, venue, stakeholders engaged, objectives of engagement, etc.); and
 - The database will allow for linking of engagement records for each engagement, such as photographs, audio files of audio-recordings, video files of video-recordings, electronic copies of attendance registers, meeting minutes, etc., to each engagement activity captured.
- A Feedback Register:
 - To log all Project-related feedback – questions, comments, concerns, and complaints – received during engagement activities and by VGRC members; and
 - Feedback registers will be developed in book or file format for VGRC members and CLOs and Grievance Officer for use in the affected communities.
 - Contents of Feedback Registers will be reviewed weekly and the captured into an associated database.
 - The Feedback Registers will be used in the identification of issues that need to be reflected in the project’s E&S management plans/procedures.
- A Grievance Register:

- To log all grievances received in accordance with the MHPP GRM Procedure including details about the complainant/s, the grievance (date received, description of incident) grievance category, grievance priority level, time frames, investigation results, recommended remedial measures, status, etc; and
- The database will allow for linking of all records associated with grievance management process, including electronic copies of the Grievance Registration Form, Grievance Close-Out Form, Grievance Response Letter/s, and any reports or correspondence associated with grievances.
- An Actions Tracker:
 - Details of any required actions identified during engagement, including description of issue necessitating action, description of action, responsible party for implementing action, and deadline for implementation of action; and
 - The Actions Tracker will allow for linking of records related to actions, such as electronic copies of meeting minutes, agreements, progress reports, correspondence, photographs, etc.
- Various SEP-related **templates**, including:
 - Meeting Agenda (Annex 1);
 - Attendance Register (Annex 2); and
 - Minutes of Meetings (Annex 3).

9.3. Budget for MHPP SEP Implementation

A budget for MHPP SEP implementation during the development phase is currently being developed. As both MHPL and the GoM PIU are involved in funding stakeholder engagement and grievance redress management (GRM) activities, this budget will draw on inputs from both organisations.

The budget for MHPP SEP implementation will be tracked and monitored on an ongoing basis to ensure effective and efficient use of human and financial resources involved in Project SEP implementation.

10. Monitoring, Evaluation, and Reporting

10.1. Monitoring and Evaluation

Monitoring the stakeholder engagement activities is important to ensure that consultation and disclosure efforts are effective and that stakeholders have been meaningfully consulted throughout the process. The objective of monitoring and evaluating stakeholder engagement activities is to improve current and future management of engagement outputs, outcomes, and impact. Each

stakeholder engagement activity should be monitored and evaluated, then aggregated and evaluated as a whole. A set of Key Performance Indicators (KPIs) shall be defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document.

Performance shall be reviewed annually by tracking:

- Project-approved communication materials disseminated: type, frequency, and location.
- Number and type of formal, scheduled engagement events and level of participation by specific stakeholder categories and groups.
- Number and type of ad hoc engagements and stakeholder category.
- Number of queries, comments, and concerns, by category, sub-category and stakeholder group received, as well as responses provided.
- Number of complaints/grievances, by category, sub-category, stakeholder group, and district, as well as status (new, under investigation, pending, closed out) of complaints/grievances.
- Recording and tracking commitments made to stakeholders and/or actions identified during stakeholder meetings.
- Community attitudes and perceptions towards the Project based on media reports and stakeholder feedback.

10.2. Reporting

It is essential to keep a record of each stakeholder meeting and the key outcomes or information derived from it. In this way, the Project can keep track of its engagements and build on them to establish the most effective relationships with stakeholders. Keeping meeting records helps to establish 'audit' trails if the need to demonstrate the content or appropriateness of meetings arises. On-going feedback to affected stakeholders is essential to ensure and maintain a SLO. MHPP will provide periodic reports to the affected stakeholders that describe progress with implementation of the project Management and Action Plans on issues that involve on-going risks to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders.

This SEP identifies several key reporting activities. The SEP will be reviewed by the Project throughout the different Project cycles, biannually during the development phase and annually thereafter, to assess whether:

- The type of consultation and disclosure activities are appropriate for the different stakeholders.
- The frequency of consultation activities and information disclosure is sufficient.
- The grievance management process is effective.
- The staffing capacity to effectively implement the SEP.
- Stakeholder attributes have changed, necessitating adjustments in engagement strategies.

- The list of identified stakeholders remains appropriate or certain stakeholders are no longer relevant to the Project and/or whether certain stakeholders should be added.
- Additional updates are required due to Project developments.

10.2.1. Monthly Reports

The MHPL ESMU will compile a monthly summary report for distribution to MHPL management and the PIU. The monthly report will provide the following information:

- Number and type of scheduled engagement activities undertaken for the previous month.
- Deviations from engagement schedule and corrective actions to be taken.
- Number and type of ad hoc engagement activities undertaken and reason/s for undertaking.
- Required actions arising from the engagements and status of actions.
- Summary of queries, issues and concerns raised by stakeholders during engagements.
- Risks identified by Project team plus recommendations to prevent and/or manage risks.
- Support and/or input required from MHPL management and/or PIU management.
- Comparison of data from previous monthly reports to identify trends and/or fluctuations.
- Summary of grievances received, including grievance categories, response times, grievance status (number of new grievances received; number of grievances under investigation, number of grievances pending, number of grievances closed out), actions implemented to resolve grievances, grievances escalated to Project grievance committees.
- Engagement schedule for upcoming month.
- Reports to include tables, graphs, and photos.

10.2.2. Quarterly Reports

The MHPL ESMU team will prepare quarterly reports summarising stakeholder engagement activities undertaken for each quarter. The quarterly reports will be shared with lenders and other relevant stakeholders. The quarterly stakeholder engagement reports will include any lender requirements for documentation and reporting. At a minimum, the quarterly reports will include the following:

- Number and type of scheduled engagement activities undertaken for the previous quarter.
- Deviations from engagement schedule and corrective actions to be taken.
- Number and type of ad hoc engagement activities undertaken and reason/s for undertaking.
- Required actions arising from the engagements and status of actions.
- Summary of queries, issues and concerns raised by stakeholders during engagements.
- Risks identified by Project team plus recommendations to prevent and/or manage risks.

- Support and/or input required from MHPL management and/or PIU management.
- Comparison of data from previous quarterly reports to identify trends and/or fluctuations.
- Summary of grievances received, including grievance categories, response times, grievance status (number of new grievances received; number of grievances under investigation, number of grievances pending, number of grievances closed out), actions implemented to resolve grievances, grievances escalated to Project grievance committees.
- Engagement schedule for upcoming quarter.
- Reports to include tables, graphs, and photos.

10.2.3. Annual Report

A Project specific annual report summarising Project progress and/or performance, including stakeholder engagement and grievance management, will be produced during Project development and construction phases. Information about the Project during its operational phase will be included in the project company's annual reports.

10.3. Ongoing Review and Continuous Improvement

The SEP will be periodically updated as the Project progresses, biannually in the first year and annually thereafter. The SEP will be updated based on:

- Additional stakeholders identified during the E&S studies, including directly and indirectly communities identified as the PAOI is further elaborated and confirmed.
- Changes in stakeholder attributes identified during updates of the stakeholder mapping and analysis done for the current version of the SEP.
- Feedback from stakeholders on stakeholder engagement methods, frequency and/or messaging.

ANNEX 1: MEETING AGENDA TEMPLATE

MPHL Reference					
Meeting Type					
Subject					
Date		Start Time		End Time	
Location					
Participant/s					
For Distribution					
Distribution					
Recorded by					

MEETING AGENDA

No	Agenda Item	Time	Presenter
1			
2			
3			
4			
5			

ANNEX 2: Attendance Register Template

A: COMMUNITY MEETINGS

MPHL ATTENDANCE REGISTER: <i>COMMUNITY MEETINGS</i>					
Date		Time Started		Location	
Topic				Facilitator/s	PIU, MHPL, CIA consultant etc.
Participant/s					

No	Name	M/F	DoB/Age	Residence	Occupation	Tel. No.	Signature
1							
2							
3							
4							
5							
6							
7							
8							

B: OTHER INTERESTED PARTIES

MPHL ATTENDANCE REGISTER: <i>OTHER INTERESTED PARTIES</i>				
Date		Time Started		Location
Topic				Facilitator/s
Participant/s	PIU, MHPL, CIA consultant etc.			

No	Name	M/F	Organisation	Position	Email	Tel. No.	Signature
1							
2							
3							
4							
5							
6							
7							
8							

NB: By signing this attendance register you agree to having your photograph taken during the meeting and for the photos of yourself to be used by the Mpatamanga Hydro Power Project (MHPP) for any legal use. Such use may include: MHPP Project Publications (quarterly newsletters; public presentations; brochures), MHPP website; MHPP Annual Reports; Public media: Newspapers, magazines, etc.

ANNEX 3: Minutes of Meeting Template

MPHL Reference	MHPL-MR-CM-202x-0x-xx
Meeting Type	Community Meeting
Subject	Monthly Meeting
Date	202x/0x/xx
Location	Name of village / village group
Participant/s	Community members + other e.g. TA, GVH, VH, DC
Distribution	MHPL and PIU E&S
Recorded By	

Meeting Objective

- Topic 1
- Topic 2
- Topic 3
- Topic 4
- Topic 5

Agenda

The agenda for the meeting is presented below.

No	Agenda Item	Time	Presenter
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

No	Agenda Item	Time	Presenter
11			
12			

Meeting Summary

The meeting is summarized below.

- ...
- ...
- ...
- ...
- ...

DRAFT

Follow-Up Actions / Next Steps

The issues and/or questions and/or comments and/or complaints recorded during the meeting as well as the required follow-up actions or next steps, where relevant, are captured in **Error! Reference source not found.**

Follow-Up Actions / Next Steps

No	Issue/Question/Complaint/Comment	Response	Response By	Follow-Up Actions / Next Steps	Responsible	Deadline
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						

No	Issue/Question/Complaint/Comment	Response	Response By	Follow-Up Actions / Next Steps	Responsible	Deadline
12						
13						
14						
15						

ENDS