	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 1 of 28

Golomoti Solar PV Stakeholder Engagement Plan

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Table of Contents

1	Introduction.....	4
1.1	Context and Purpose of the Stakeholder Engagement Plan.....	4
1.2	Project Overview and Site Context.....	5
2	National and International Stakeholder Engagement Requirements.....	8
2.1	National Requirements.....	8
2.2	International Requirements	8
2.2.1	IFC Performance Standards.....	8
2.2.2	Equator Principles.....	9
3	Stakeholder Identification and Mapping.....	10
4	Communication Methods.....	18
5	Stakeholder Engagement	20
5.1	Stakeholder Engagement Considerations	20
5.2	Engagement Carried Out to Date	21
5.3	Stakeholder Engagement Strategy	21
6	Grievance Redress Mechanism	25
7	Roles and Responsibilities	25
8	Monitoring and Evaluation	26
9	Reporting Mechanisms.....	26

List of Figures


Figure 1:	Project location and general layout	7
Figure 2:	Stages of Engagement	22

List of Tables

Table 1: Project Stakeholders.....	11
Table 2: Stakeholder Engagement Tools.....	19
Table 3: Construction Engagement Activities	24

Abbreviations and Acronyms

Abbreviation / Acronym	Definition
CBOs	Community based organisations
CSO	Civil society organisations
CHRR	Centre for Human Rights and Rehabilitation
DGTWG	District Gender Technical Working Group
EGENCO	Electricity Generation Company of Malawi
EIA	Environmental Impact Assessment
EPs	Equator Principles
ESCOM	Electricity Supply Corporation
ESIA	Environmental and Social Impact Assessment
FGD	Focus Group Discussion
GAASO	Golomoti Active AIDS Support Organization
GBVH	Gender Based Violence and Harassment
HH	Household
IAP	International Accountability Project
IFC	International Finance Cooperation
IFI	International Finance Institution
JCM	Golomoti JCM Solar Corporation Limited
KII	Key Informant Interview
MERA	Malawi Energy Regulatory Authority
MW	Megawatts
NGO	Non-Governmental Organisation
PS	Performance Standards
SEP	Stakeholder Engagement Plan
TA	Traditional Authority
TLC	Total Land Care

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 4 of 28

1 Introduction


1.1 Context and Purpose of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) provides a framework for stakeholder engagement for JCM Matswani Solar Corp Limited (JCM) in relation to the development and construction of a 20 MW solar plant in Golomoti, Dedza District, Central Region, Malawi (the Project).

Stakeholder engagement is a two-way process of communication between JCM and stakeholders that may be impacted by the Project, influence project decisions, or have a specific interest in the project (e.g., non-governmental organisations or academic institutions). The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of the SEP is to improve and facilitate participation of both affected and interested stakeholders and ensure that Project design, approaches, and activities are being implemented in a participatory and inclusive manner, and in a way that minimizes potential environmental and social risks. The plan is what will enable JCM to have a social contract on which all other activities will be based.

Key objectives of stakeholder engagement include the following:

- **Enabling understanding:** Providing an inclusive and transparent process of culturally appropriate engagement and communication to enable stakeholders to be well informed about the Project.
- **Building relationships:** Through supporting open dialogue, engagement seeks to establish and maintain a productive relationship between JCM and Project affected communities, as well as other key stakeholders.
- **Facilitating participation:** Providing a forum for stakeholders to participate in decision making regarding the Project, regardless of gender, age, ethnicity, status and other socio-economic factors so that they are not adversely impacted and are able to access Project benefits.
- **Engaging vulnerable groups:** Identifying and engaging vulnerable groups to enable equal access to Project information and a platform for them voice their concerns so that specific measures are included in the Project development.
- **Managing expectations:** It is important to ensure that the project does not create or allow unrealistic expectations to develop amongst stakeholders about potential benefits, such as employment or compensation. The engagement process serves as a mechanism for understanding and managing expectations by disseminating the correct information in an accessible way.
- **Enabling compliance:** The process is designed to enable compliance with both local regulatory requirements and international best practice.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 5 of 28

- **Facilitate free, prior and informed consultation:** The Project aims to provide a platform for engagement that is free of external manipulation or coercion or intimidation, undertaken in a timely way so that stakeholders are informed prior to the development or implementation of the Project, and ensure information is presented in an understandable and accessible way with consideration for literacy and language.

The purpose of the SEP is to provide a framework for managing stakeholder relations to minimise social risk, and to enhance relationships between the developer and project affected communities.

The SEP has the following objectives:


- To provide a practical framework for engagement with stakeholders during the construction phase of the Project, in compliance with national and international standards.
- To provide a methodology for identifying and mapping key stakeholders based on their level of interaction with the Project, influence and interest in the Project, including vulnerable groups (e.g. female-headed households, elderly, youth, subsistence farmers, etc.).
- To help maintain and enhance the Project’s social license to operate by enabling two-way inclusive communication between JCM and stakeholder groups through engagement that is culturally appropriate with consideration for language and gender.
- To provide an effective and accessible mechanism for reporting and managing grievances.
- To define the roles and responsibilities of those involved in managing stakeholder engagement as well as provide a basis for reporting and monitoring engagement activities during the construction phase of the Project.

This SEP has been prepared in line with national legislation and international standards including the International Finance Corporation (IFC) standards. It is a “living” document that has been updated from the SEP developed for the Project development phase to meet the needs of stakeholder engagement during the construction phase. This SEP will be updated once again once the Project moves into the operations phase.

1.2 Project Overview and Site Context

The Project comprises of a 20 MW solar PV plant on a 108 ha of land in the Dedza District. It is adjacent to the villages of Ching’anipa, Kalumo, Nsamala, Kapesi, Chhisaka and Chitseko, in Golomoti and 132 km from Lilongwe (along on the M1 road) (Figure 1).

The solar plant will connect to a short (approximately 0.5 km) 132 kV transmission line that runs alongside an existing Electricity Supply Corporation of Malawi (ESCOM) 132 kV transmission line to the Golomoti substation. Electricity generated will be sold to ESCOM and will be transferred to the national grid via the existing ESCOM Golomoti substation.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 6 of 28

There are six villages under the GVH Pitala that are expected to be affected directly by the Project. The Project is located on customary land belonging to the members of these villages, and include Ching’anipa, Kalumo, Nsamala, Kapesi, Chhisaka and Chitseko. An additional village expected to be impacted by the Project is Thondoya (Nitcheu District). In total, the six affected villages have an approximate population of 4,112 and an estimated 603 households. Chisaka, Ching’anipa and Nsamala have the largest populations of approximately 1,200, 1,100 and 1,046 people, respectively. Kalumo has an approximate population of 500 people, Chitseko 266 people and Kapesai is reported to have 70 households (population unknown). The average household size is 4.75 members. The population and household information are not based on actual census or survey data but estimated based on information provided by each village’s chief.

The site is generally flat and prior to the start of construction was predominantly used for farming purposes (both rain-fed and dimba gardening where irrigation activities are practised). Crops that are commonly cultivated in the area include maize, cotton, soy, cowpeas, and sweet potatoes, cucumber, watermelon, sorghum, and cassava. Prior to construction clearing activities the trees on the Project site included natural and planted trees, including mango, acacia, and baobab trees. Local communities also rear livestock including cattle, goats, and sheep. As such grazing is a common activity on the site. Farming activities are primarily undertaken for subsistence, with small amounts of produce sold within the villages and Golomoti.

Land acquisition for the project (including the transmission line way leave) has been completed. There were 146 Project Affected Persons (PAPs) who were compensated for their land and 1 PAP who was compensated with land. All land was compensated for on a willing buyer willing seller basis and as such no expropriation has taken place.

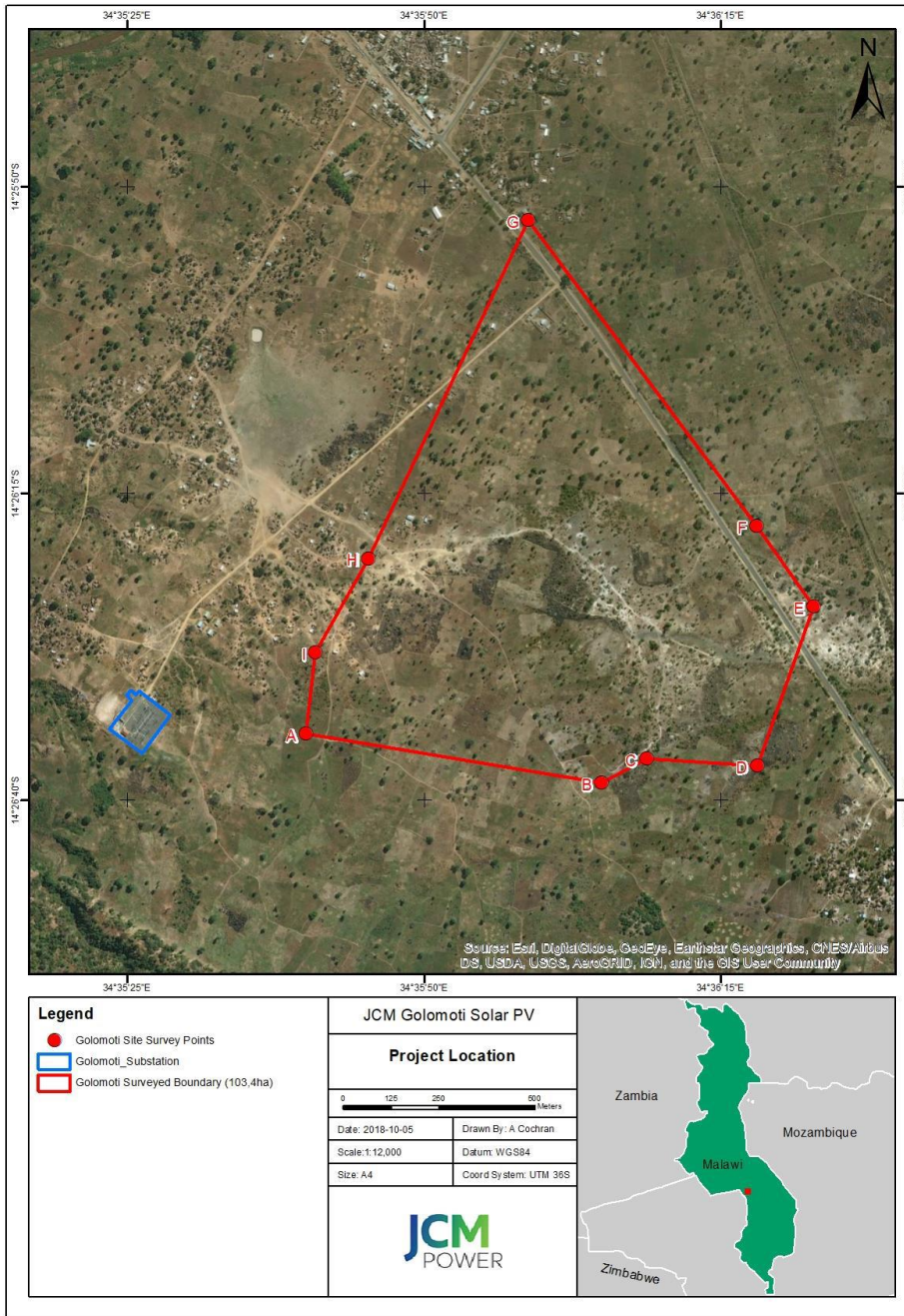



Figure 1: Project location and general layout

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 8 of 28

2 National and International Stakeholder Engagement Requirements

This section provides details of national legislative requirements and international best practice standards, namely the International Finance Corporation (IFC) Performance Standards and Equator Principles.

2.1 National Requirements

The main stakeholder engagement requirements for development projects are detailed in the Environmental Management Act, 1996¹. It states that an Environment Impact Assessment (EIA) should be developed in accordance with the requirements set out in the Act where stakeholder engagement is one of the key components. JCM received approval of the Golomoti ESIA excluding the Battery Energy Storage System (BESS). JCM's supplemental submission to cater for the BESS has been completed and pending approval from the EAD. The Environmental Licence is expected to be issued by April 2021.

Other requirements that need to be observed by the Project are grounded in the Constitution of Republic of Malawi (1995) which focuses on human rights and participation of various groups in society such as women, children and the disabled that may be vulnerable to Project impacts. As such vulnerable groups will require specific measures to ensure they are included in stakeholder engagement activities.

2.2 International Requirements

This section outlines international best practice requirements stipulated by the IFC and Equator Principles to align stakeholder engagement activities with International Finance Institution (IFI) requirements.

2.2.1 IFC Performance Standards


The IFC defines the objective of stakeholder engagement as being “the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts”². The IFC Performance Standards include specific guidance on conducting stakeholder engagement both during the planning phase as well as throughout the project lifecycle. Stakeholder engagement requirements are contained in Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts, and are summarized as follows³:

- **IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts:** Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements:

¹ The Government of Malawi, Environmental Management Act 1996. Available at <https://www.malawilii.org/mw/legislation/act/1996/6> (Accessed November 2017)

² (1) IFC Performance Standard 1: Environmental and Social Risks and Impacts. Available at http://www.ifc.org/wps/wcm/connect/115482804a0255db96fbffd1a5d13d27/PS_English_2012_Full-Documents.pdf?MOD=AJPERES (accessed November 2017)

³ Source: IFC Performance Standard 1, January 2012.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 9 of 28


stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to affected stakeholders.

- **Disclosure of relevant project information:** Provide affected stakeholders with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such stakeholders and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- **Informed Consultation and Participation:** Conduct an informed consultation and participation process involving a deep exchange of views and information, and an organized and iterative consultation, leading to the project incorporating into their decision-making process the views of the affected stakeholders on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The process should be documented, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected stakeholders. The stakeholders should be informed about how their concerns have been considered.
- **External Communications:** Implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.
- **Grievance Mechanism for Affected Stakeholders:** Establish a grievance mechanism to receive and facilitate resolution of affected stakeholders' concerns and grievances about the client's environmental and social performance.
- **On-going Reporting to Affected Stakeholders:** Provide periodic reports to the affected stakeholders that describe progress with implementation of the project Action Plans on issues that involve on-going risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders. After completion of an environmental assessment the consultation and disclosure must continue throughout the life cycle (construction and operation phase) of the project.

PS5 promotes the concept of negotiated settlements to avoid expropriation and the forcible removal of people or land use activities.

2.2.2 Equator Principles

Equator Principles III, June 2013 comprise 10 principles which are reflect the IFC performance standards. The most relevant principles in relation to this SEP are:

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 10 of 28

- Principle 2: Environmental and Social Assessment;
- Principle 5: Stakeholder engagement;
- Principle 6: Grievance mechanism; and
- Principle 10: Reporting and transparency.

3 Stakeholder Identification and Mapping

Stakeholders include individuals or groups that may influence or be impacted by the Project, and are described by the IFC⁴ as follows:

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

The level of interest is dependent on a number of factors including level of authority, country and social economic context, cultural and intellectual factors. As such stakeholder identification and mapping process adopted for the project is based on this approach.

The stakeholder identification process was undertaken during the EIA phase of the Project and continues to be built upon during the construction phase of the Project. Stakeholder categories include:

- Key stakeholders: Stakeholders who have a high level of interest or that will be directly impacted by the Project, for example neighbouring communities.
- Potentially active stakeholders: Stakeholders that will have a high level of interest or influence on the Project, particularly in relation to legal requirements and those that may be indirectly impacted.
- Other interested parties: Stakeholders that are likely to voice their opinions and/or concerns but unlikely to experience any impacts from the Project.

A list of stakeholders identified to date is provided in Table 1.

⁴ IFC (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets Available at: http://www.ifc.org/wps/wcm/connect/938f1a0048855805beacfe6a6515bb18/IFC_StakeholderEngagement.pdf?MOD=AJPERES (Accessed 27.03.17)

Table 1: Project Stakeholders

Stakeholder Category	Stakeholder	Connection to the Project
National Regulatory Bodies – National bodies are of primary importance in terms of establishing policy, granting permits and other approvals for the Project and monitoring enforcing compliance.	Environmental Affairs Department (EAD)	The Project has to comply with the Environmental and Social Impact Assessment (ESIA) requirements and to develop environmental management and monitoring plans. The EAD is responsible for issuing the Environmental Certificate after an ESIA has been approved.
	Ministry of Lands (MoL)	The Ministry (through the Department of Surveying) is a key stakeholder in the Project due to the management of land issues in Malawi. The department is the final approving authority for approving land acquisition related matters. It represents the Ministry of Lands, Housing and Urban Development on all matters to do with asset valuation, compensation and resettlement. As such the department has the authority to issue land leases/ registration certificate to JCM.
	Malawi Energy Regulatory Authority (MERA)	MERA is the overall regulatory authority for energy in Malawi.
	Electricity Generation Company of Malawi (EGENCO)	EGENCO are currently the sole generators of electricity in Malawi. The contribution of the project to the alleviation energy problems will greatly assist EGENCO.
	Electricity Supply Corporation (ESCOM)	ESCOM are responsible for the wheeling and distribution of electricity to the consumers. If the affected communities are to benefit from the electricity by way of community investment, ESCOM may have to play a part in the modalities for household connections. Additionally, the Project can draw on ESCOM’s experience in relation to land acquisition for electricity related projects especially the transmission line.
We National Government Ministries	Ministry of Gender and Social Welfare (MoGSW)	MoGSW has an interest in the social welfare of the people throughout the country. Therefore, they will be interested in how the Project is managing impacts on vulnerable groups, including women and the disabled.
	Ministry of Education, Science and Technology (MoEST)	MoEST will be interested in any access related constraints resulting from the Project as well as any skills training and education related community investment that the Project may engage in.
	Ministry of Local Government and Rural Development (LGRD)	The Local governments’ role is to re-enforce national policies through local programmes and activities thereby ensuring their subsidiarity and complementarity to the central government position. The ministry will be key, through the decentralised structures at the District Council to ensure the project is aligning with National Policies and that the project will benefit the district as well.
	Ministry of Finance, Economic Planning and Development Department)	The Ministry formulates economic fiscal policy and manage financial material resources for the Government for Malawi in order to realise balanced and sustainable economic growth to reduce poverty.


Stakeholder Category	Stakeholder	Connection to the Project
	Ministry of Natural Resources, Energy and Mining Department (NREMD)	The ministry is there to ensure sustainable development, management and utilisation of energy, minerals; and monitoring geo-hazards for socio economic development.
	District Council and District Commissioner (DC)	<p>The DC is the overarching local authority for all the development projects being implemented in the district. He is also the authority to issue the Project Planning Permit (on behalf of the Department of Physical Planning).</p> <p>Additionally, the DC oversees the compensation process for all projects within the District, including payment of compensation and monitoring activities. The DC's office works hand in hand with key technical officers like the District lands officer, District Health and Environmental Officer, District Agriculture Development Officer, District Forestry Officer and the Community Development Officer on matters related to land, environmental health, agriculture and livelihoods, forestry and social aspects including community mobilisation and sensitisation on such projects.</p>
	Ministry of Agriculture, Irrigation and Water Development (MoIWD) Department of Water Supply and Sanitation, Department of Hydrology	The Department is responsible for provision of water supply services including piped rural water supply schemes and boreholes. The Department will need to be engaged in relation to water use for the project and any water related CSR projects resulting from the Project. A water abstraction permit will be required from the Water Resources Authority if the Project requires a borehole or abstraction of surface water for construction purposes.
	Ministry of Labour (MoL)	The MoL issues the Workplace Registration Certificate as mandated by the Occupational Safety Health and Welfare Act. It is also responsible for monitoring of workers' employment conditions, health and safety during construction and operation.
	The Malawi Human Rights Commission	<p>The Malawi Human Rights Commission (the Commission) is an independent national human rights institution established by the Constitution of the Republic of Malawi under section 129, with the primary function of protecting and investigating violations of the rights accorded by the Constitution or any other law. The duties and functions are further specified in the Human Rights Commission Act; the Gender Equality Act and the Access to Information Act.</p> <p>The Commission is responsible for monitoring the implementation of the Gender Equality Act and is responsible for investigations of Gender Based Violence. The Commission is also supposed to be a member of the District Gender Technical Working Group, and is yet to be introduced to the group.</p>
	The District Gender Technical Working Group	The District Gender Technical Working Group (DGTWG) is part of the National Gender Machinery in the district councils that leads in the mainstreaming and implementation of gender in the district councils. The DGTWG provides expert support to all work in Gender equality as well as Gender Based Violence. Members of the group include leading Government District gender Officers, NGOs working in gender related projects, GBV experts,

Stakeholder Category	Stakeholder	Connection to the Project
		<p>The Police, The Judiciary and practitioners at policy and implementation level from areas such as health, gender rights, or child protection and companies working in the district.</p> <p>Partnership with JCM JCM is a member of the DGTWG and all community activities in the Gender Based Violence and Harassment (GBVH) Action Plan are implemented in partnership with the District Gender Technical Working Group.</p>
	National Water Resources Authority	The NWRA is a public entity intended to provide advice on water resources policy and implement regulatory functions. They will be key in the project in terms of ensuring all project water related activities are properly licenced. They will be responsible for issuing permits for water use, include borehole licence (in consultation with Water boards) and monitor and enforce conditions attached to permits for water use
Community level	Project affected communities including residents in surrounding settlements, landowners and users	Households and communities that will be directly or indirectly affected by the proposed project activities. This includes people living in the affected land either by direct land take or by social and environmental impacts.
	Chiefs/Traditional authorities Village heads	Local community leaders act as representatives of their local community. Meeting with Traditional Authorities will follow local practices and be held prior to any wider communication in order to respect the political and social structure.
	Community Based Organisations	These are thematic based community organisations focused on a specific goal for instance, Human rights promotion, HIV AIDS and GBV just to mention a few.
	Community Action Group	A grouping comprising of traditional community leaders, religious leaders, Counsellor, School head teachers and opinion leaders whose aim is to help prevent and respond to GBV at community level. The group operates under the guidance of a larger NGO.
	Community Activists	These are village gender champions whose main task is to act as role models in the communities, raise awareness on GBVH and help in reporting and referring cases of GBVH in the communities. These usually operate under a larger NGO.
Vulnerable groups	<ul style="list-style-type: none"> Head of households are categorised based on age, gender, disability and/or number of children 	<p>Vulnerable groups may be disproportionately affected by the proposed Project by virtue of socio-economic status or physical abilities and are therefore less resilient to change. A vulnerability assessment will be required for the Project to identify specific vulnerabilities in the Project area.</p> <p>Vulnerable group head of households categorised below:</p> <ul style="list-style-type: none"> Female Headed Households (FHH); Child Headed Households (CHH); Head of Household older than 65 (HoH > 65); Households with disabled or chronically ill household heads or members;


Stakeholder Category	Stakeholder	Connection to the Project
		<ul style="list-style-type: none"> Households with more than five children below the age of 5; and Households consisting of one or two elderly people only.
Civil society groups	Community based organisations (CBOs) and cooperatives.	Organisations that may be impacted by the Project or that the Project can work with on livelihood development activities.
Non-Governmental Organisations (NGO) / Institutions / Academics	Includes international, national and local NGOs covering biodiversity/conservation, human rights, gender and child related issues. NGO's associated with the Project to date are:	NGO and academic institutions are able to influence the success of projects through advocacy and negative media attention. The Project is required to identify and engage relevant NGOs and institutions to keep them informed about the Project. They may also act as a partner in implementing livelihood or community investment programmes.
	CHRR: The Centre for Human Rights and Rehabilitation https://www.chrrmw.org/	<p>The Centre for Human Rights and Rehabilitation (CHRR) is a human rights non-governmental organization in Malawi. It was founded in February 1995 as a non-profit, apolitical, voluntary organization registered under the Trustees Incorporation Act of 1962. The organization was founded by former student exiles who returned home to the promises of a new democracy in 1994. The organization is authorized to provide its services anywhere in Malawi. Its registration under Incorporation Act 1962 provides the basis that defines the organization's mandate and scope of work. Currently programmes are carried out in all the (3) three regions namely Southern, Central and Northern Regions.</p> <p>CHRR's mission is:</p> <ul style="list-style-type: none"> To contribute towards the protection, promotion and consolidation of good governance by empowering rural and urban communities in Malawi to be aware of and exercise their rights through research, advocacy and net-working in order to realize human development CHRR seeks to contribute towards the realization of this vision through programmes carried out under five core activities, namely: Public Awareness and Community Empowerment, Civic and Human Rights Education, Training and Research; Advocacy, Capacity Building, and Net-working.
	IAP: International Accountability Project https://accountabilityproject.org/	IAP, an international advocacy organization, wins policy change, boosts local advocacy efforts & supports local activists and communities to access & exchange information on development that affects them. By opening space at influential decision-making spaces, IAP seeks to advance development principles and projects that prioritize human and environmental rights. IAP is recognized for its nimble, thoughtful & inclusive work that fights for community-led expertise & experience to be the center of how development is designed,

Stakeholder Category	Stakeholder	Connection to the Project
		<p>funded and implemented. At our core, IAP leverages community-level expertise & experience to increase community-led participation & reinforce campaigns supporting community-led development.</p> <ul style="list-style-type: none"> • IAP reinforces how communities participate as central figures in the development process. IAP identifies the development financial institutions and standard-setting processes with the greatest impact on people’s ability to shape their own development and provide remedies when rights are violated. • To influence the policy and practice of development and as a mobilization tool, IAP assists communities to gather their own community-led research on their development priorities, their experience in the development process and the potential impacts of development projects. • When assisting specific campaigns, IAP supports the community-led priorities and recommendations directed towards the financial institutions, governments and project proponents connected to the project. IAP reinforces community-led campaigns to change how development is designed, funded and implemented. • IAP creates technology platforms and training tools to support communities and civil society to monitor and respond to development projects likely to cause human rights and environmental abuses. IAP exchanges expert advice, training, and materials to communities likely to be affected and the civil society groups supporting them.”
	<p>Both Ends https://www.bothends.org/en/</p>	<p>The vision of Both ENDS is a world where long-term environmental sustainability and social equity take priority over short-term profits. Both ENDS strengthens global civil society to gain decisive influence on the use of nature and the environment, thus contributing to societies that stay within our planetary boundaries and respect all human rights, including the rights to water, food and a safe living environment.</p> <p>Civil society actors should have a free, independent, active and influential voice about the use of the natural resources that determine the quality of their daily lives and the future of their children. Respecting the planetary boundaries is a precondition for sustainable development. We should minimise climate change, loss of biodiversity, pollution and ozone depletion, and use land and water in a responsible way, in order to keep our planet livable. At the same time, sustainable societies should respect all human rights. Not only the rights to water, food and a safe living environment, but also gender equity, indigenous rights and space for civil society.”</p>

Stakeholder Category	Stakeholder	Connection to the Project
	Golomoti Active AIDS Support Organization (GAASO)	<p>Golomoti Active AIDS Support Organization (GAASO) is a community-based NGO working in rural communities in Dedza, Malawi. The organization serves women, Children, men, youth including people with disabilities. GAASO has programs on Health, Human rights, Women Empowerment, Education, Environment and Access to Justice. GAASO serves a population of just over 100,000 people. In these community's poverty is at its best and usually preventing people from accessing justice more especially women who are facing Gender based violence and other social injustices. GASSO works to support such vulnerable groups of people by providing education on relevant laws and paralegal services.</p> <p>The organization is registered with the government of Malawi, Registration Number 11640. GAASO is also an affiliate of the National Youth Council of Malawi (NYCOM) which is the coordinating body of youth activities in Malawi. The organization works in collaboration with development partners at national level such as Ministry of Gender, Child and Community Development, the Elderly and People with Disabilities, Ministry of Youth, Dedza District Council and has partnerships with several organizations such as The Malawi Network of People Living with HIV and AIDS (MANET+), Malawi Network of AIDS Service Organizations (MANASO), Malawi Human Rights Commission, Salima AIDS Support Organization, Orphans Support Africa (OSA), and World University Service of Canada (WUSC).</p>
	Total Land Care http://www.totallandcare.org/	<p>Total Land Care (TLC) was founded in 1999 by Trent Bunderson, Zwide Jere and Ian Hayes to sustain and expand the successful agricultural and natural resource management programs of a 12-year project funded by USAID – the Malawi Agroforestry Extension Project. TLC's mission is to improve the livelihoods and standards of living of smallholder farm households across the region.</p> <p>The program design and implementation involves an integrated community-based approach to address basic needs and challenges identified with communities. The key concept is to instill responsibility among rural communities and households to tackle their own needs, with special emphasis on building resilience to climate change. TLC facilitates this process by collaborating with communities to conduct a needs assessment and to evaluate land-use practices, crops, and livestock best suited to the agro-ecologies and interests of different beneficiaries. This is followed by developing community-based action plans that involve various interventions to address different needs. The ultimate aim</p>

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 17 of 28

Stakeholder Category	Stakeholder	Connection to the Project
		is to establish a foundation of knowledge, skills and resources to enable the transition from subsistence survival to business-based livelihoods that can grow and prosper.
Commerce and Industry	Local businesses / potential suppliers and contractors	Will be interested in procurement opportunities in relation to the Project. They may also create cumulative impacts, as such the Project is required to identify industries in the local area and aim to collaborate with them where appropriate.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 18 of 28

4 Communication Methods

During engagement activities, a variety of methods are used to engage with specific groups reflecting their level of authority, social economic context, cultural and intellectual factors such as level of education and literacy.

Although English is the official language in Malawi, Chichewa is the national language spoken by 57% of the population⁵. According to the 1998 Population and Housing Census, 91 % of the people of the Central Region of Malawi speak Chichewa, with Chitumbuka and Chiyao (approximately 3 % each) commonly spoken or used for communication in households in the Central Region.⁶

Table 2 present the various tools that are used for stakeholder engagement. The following main communication methods will be use for stakeholder engagement during the construction phase of the Project:


- **Focus Group Discussion:** Targeted discussion with a group of individuals with similar characteristics such as women, youth disabled groups, landowners etc. to capture targeted information that may not be captured in an open space. These meetings will also create a platform for vulnerable or marginalised groups to freely voice their opinions.
- **Key Informant Interview:** One-on-one meeting with a professional or individual with knowledge and expertise about a specific subject area that can provide targeted information in relation to specific aspects of the project for consideration in project design and implementation of project elements or programmes.
- **Formal Meeting:** Formal meeting to present project information to a group of individuals with authority or that may be a key stakeholder, such as the government or NGOs.
- **Community Meeting:** Gathering of all members of the community residing in a particular area, such as a settlement or town, to present Project information and gather feedback.

⁵ The language spoken in Malawi.-study country.com. Available at <http://www.studycountry.com/guide/MW-language.htm> (accessed February 2019)

⁶) 1998 Population and Housing Census. Available at http://www.nsomalawi.mw/images/stories/data_on_line/demography/census_98/final_report.pdf (accessed February 2019)

Table 2: Stakeholder Engagement Tools

Tool	Purpose	Stakeholder Groups	Use
PowerPoint presentations	Detailed presentation to provide technical information regarding the project	National regional and local authorities. NGO's Institutions Key Informants/ Professionals.	Used at formal meetings
Basic flipbook/pictorial presentation	Presentation of general information regarding the project	Settlements Vulnerable groups	Used at settlement meetings and focus group discussions
Flyers/leaflets/background information document.	Allows stakeholders to take information home and have a line of contact with JCM should they have any questions.	All stakeholder groups	Distributed at meetings and place in accessible public locations (e.g., community centre, health centre and schools)
Reports and plans	Technical written reports and management plans that present details on impacts of the project and how JCM are managing the environmental and social aspects of the project to minimise adverse impacts and maximize benefits.	Government, professionals, academics and civil society/public	Available online (JCM Website), Project office.
Internet	Provides general detail regarding Project development	All	Global or national access to information
Questions and answer guide	List of most frequently asked questions to be used as guidelines to respond to any question from stakeholders.	Internal use by Project staff to align responses to questions. Can also be accessible on the Project website if appropriate	Available online if appropriate.
Posters	Announce the date/ time and venue of meeting	All	In central locations within settlements or in public places
Meeting evaluation	Process to gather information to evaluate the success of meetings and collect further feedback / comments not collected during the meeting	All	For literate groups feedback can be provided using a meeting feedback form (see Section 8) after meeting. For illiterate groups this can be done verbally or by using creative methods such as pictorial methods or verbally

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 20 of 28


5 Stakeholder Engagement

This section sets out the various key stages of engagement that are required throughout the life of the Project.

5.1 Stakeholder Engagement Considerations

The following considerations were and are still being made when planning for stakeholder engagement:

- 1. It takes time and resources:** JCM is aware that long lasting relationships with the stakeholders based on trust take time for relationships with stakeholders to develop and grow, bearing in mind that these relationships should be nurtured and not fostered to fade. Additional stakeholders are continuously being identified that also want to be engaged. No willing stakeholder has been excluded from the process of engagement. Some stakeholders were educated about the concept of engagement itself, as well as on the complex issues requiring specialised and technical knowledge like the functioning of the Grievance Redress Mechanism.
- 2. It raises expectations:** Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such JCM from the outset has tried to be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities. The engagement processes have tried to provide an opportunity to develop relationships with stakeholders and potential Project partners who can assist with implementing corporate social responsibility projects and the livelihoods restoration plan (LRP).
- 3. Securing stakeholder participation:** JCM is aware that cultural norms and values can prevent stakeholders from freely participating in meetings, especially women. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This has been minimised by having a Community Liaison Officer (CLO) who is knowledgeable of the area and culture, working together closely with the village grievance redress mechanism committee and livelihoods restoration working group who are sensitive to local power dynamics.
- 4. Consultation fatigue:** There is evidence to suggest that stakeholders can easily tire of consultation processes. Often stakeholders feel their lives are not improving as a result of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This has been avoided by coordinating stakeholder engagement during the ESIA process, and by ensuring practitioners do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the client and other project specialists.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 21 of 28

5.2 Engagement Carried Out to Date

To date a number of stakeholder engagement activities have been carried out. These include the following:

1. Engagement with the District Council for site identification, selection and land acquisition/compensation payments process. The District Commissioner keeps all of the meeting records relating to land acquisition.
2. Engagement with the key ministries of government for the official launch of the project, graced by the Minister of Energy, Mr Newton Kambala.
3. Engagement with the Ministry of Land, Housing and Development for support in carrying out the Asset Survey, Cadasral Survey and all paperwork related to the land registration processes.
4. Engagement with the Traditional Authority Kachindamoto, Village Group Headmen and all community members eligible for compensation.
5. Various community meetings for the purpose of planning and carrying out the ESIA, ESIA disclosure, baseline study for the Corporate Social Responsibility (CSR) study, introduction of the various committee like the grievance redress committee selection and livelihoods restoration plan committee.
6. Community update meetings regarding the projects, inception, construction, and on-going plans, (done at least once every three months).
7. Engagement with the District Council updating them on the Project roadmap and the planned CSR community activities.
8. Gender Equality and GBVH Assessment in Golomoti and Dedza district at large.

5.3 Stakeholder Engagement Strategy

Figure 2 shows four key stages of engagement that are required throughout the life of the Project. Within each of the stages are specific topic areas that need to be covered. It is however important to recognise that stakeholder engagement is an ongoing process of communication to build relationships and creating benefits for both the Project, the government and private sector players and affected communities. Therefore, meetings beyond these activities may be required to ensure that stakeholders are kept informed about Project developments.

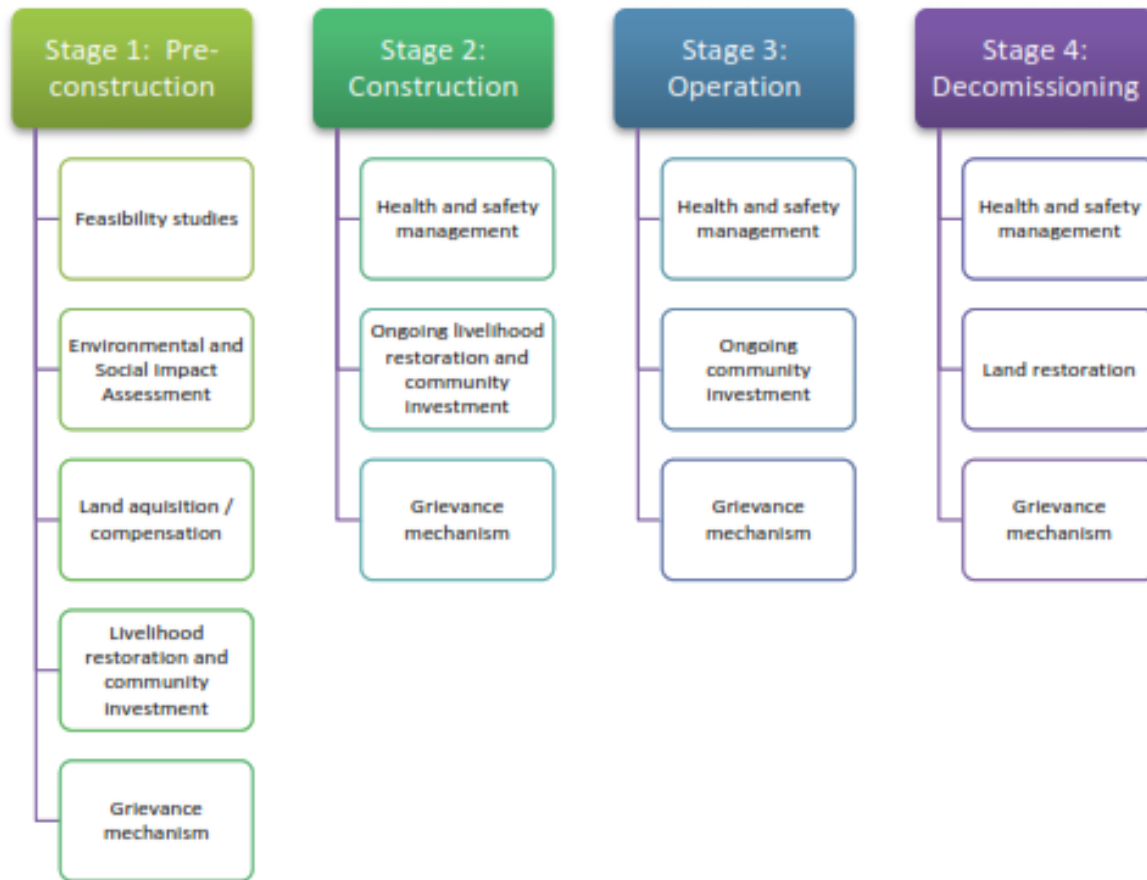



Figure 2: Stages of Engagement

Construction phase engagement is to be used to monitor the success of the mitigations that have been established for this stage of work, respond to grievances, and identify alternative mitigation measures where required. During this period meetings with the communities are to be held on a regular basis. Meetings will include Project updates, health and safety sensitisation and obtaining feedback regarding the Project.

As the Project is now in the construction phase the main stakeholder engagement activities are:

- Livelihood restoration/community investment:** As a result of economic displacement, to mitigate negative impacts and deliver development benefits a gender focused livelihood restoration programme is required. This includes development of livelihoods programming in collaboration with affected communities, chiefs, local government, and other key stakeholders.

Additionally, conversations on CSR activities are underway. Other key programmes are going to be rolled out as the year progresses in the area, in collaboration with the community members and the District Council.


	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOL-JCM-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 23 of 28

- **Community health and safety management:** the communities are situated close to the construction activities and the access road from the main road runs directly through the communities. This close proximity of construction activities including construction workers and active machinery presents a community health and safety risk. Additionally, the clearing of land will result in increased dust emissions which will impact the community. The management and mitigation of these community health and safety risks and impacts requires ongoing engagement. This involves both informing the community of the risks (proactive communication) and educating them on how to avoid them and remain safe, as well as engaging with the community on issues they may have due to the risks and impacts materialising and satisfactorily resolving these issues. The latter should be undertaken through the grievance mechanism, as described below.
- **Grievance management:** JCM have a Village Grievance Redress Mechanism that is applicable to the community. Refer to Document No: GOLPV-ES-RP-0013 for the full grievance mechanism.
- **Gender Based Violence and Harassment:**
 - Stakeholder Identification: The GBVH Risk Assessment helped in the identification of key GBVH stakeholders in the Project area and the mapping of the District GBVH Referral Pathways. This has led to the development of strategic partnerships the most notable being DGTWG and the Malawi Human Rights Commission. This has improved JCM’s credibility at District level as well as promoted accountability between the company and the Project affected communities.
 - JCM has partnered with the DGTWG in the implementation of all community related activities in the GBVH Action Plan. The DGTWG will be crucial in building GBVH capacity and knowledge in the local community. This includes providing information on the updated Community Grievance Redress Mechanism and referral pathway services, as well as running GBVH awareness raising and prevention activities targeting distinct groups (community leaders, mother groups and village development committees).
 - JCM is actively involved in all the DGTWG meetings, which ensures easy access and effective dissemination of company information to relevant stakeholders.

Table 3 provides an overview of consultation activities and their frequency during the construction phase.

Table 3: Construction Engagement Activities

Stakeholders	Information Requirements	Method of communication and Frequency
Government (national, regional, district)	Project developments. Livelihood restoration/land acquisition issues. Other project approvals. Community investment.	Ongoing as required
Traditional Authority Kachindamoto and Chiefs	Project updates Represent community in the grievance redress process Community investment	Monthly meetings, Community meetings at least every three months
Directly Affected Communities	Project updates	Community meetings in areas where construction is taking place at least two weeks prior to work starting and every three months or as situation requires thereafter. Community Notices
	Report grievances	A community liaison/grievance officer is based in key construction location. Village Grievance Redress Committee
Community Based Organisations (TBC)	Project updates Report grievances	Updates via the local radio
Employees/Contractors	Project updates to keep staff engaged in their working environment.	Weekly team meetings. Toolbox talks for construction workers
	Report issues related to labour and working conditions.	Notices posted around the site.
	Management/ monitoring of staff grievances.	Staff newsletters, if applicable. Toolbox meetings
Non-Governmental Organisations	Project updates Community investment Land acquisition process GBVH Stakeholder Engagement	District feedback meetings Email correspondence Phone calls
Local public services	Project updates Report issues related to public service Grievances	District feedback meetings,
Media	Project updates	Email updates/newsletter as required.
Local businesses	Project updates Management of cumulative impacts	Quarterly meetings with relevant stakeholders
Academics and research institutes	Project updates	Email update as required.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOLPV-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 25 of 28


6 Grievance Redress Mechanism

Refer to the Golomoti Village Grievance Redress Mechanism (Document No: GOLPV-ES-RP-0013).

7 Roles and Responsibilities

Details of stakeholder engagement responsibilities within JCM are provided below:

- JCM:** JCM strongly supports a participatory approach and constructive exchanges between stakeholders, including NGOs, CSOs, trade unions, social movements, community-based organisations, business associations and other socio-economic and labour market role players. JCM endeavours to involve such organisations within its stakeholder engagement activities to encourage transparency and provide accessible and timely information essential to improve public knowledge and build trust with all stakeholders. JCM will encourage and provide opportunities and support for open dialogue amongst stakeholders.
- Country Director:** Gives direction and stir on the project activities. Engages with key government stakeholders at Ministry and key department level.
- Community Liaison Officer:** Responsible for managing the in-country Community Liaison Team (Village Grievance Redress Committee, Livelihoods Restoration Planning Working Group), ensuring sufficient resources are made available for designated functions and ensuring that the stakeholder engagement process is effective and is being implemented in line with the approach set out in this SEP. Primarily the face of the project responsible for building effective and trusting relationships with stakeholders/communities through regular visits and communication regarding the project in line with this SEP. Other activities include updating stakeholder lists and logging/tracking of activities and receiving grievances and follow up when required. Primarily responsible for establishing and implementing community investment project based on community needs assessments. This includes maintaining stakeholder relationships with partners for delivery of investment projects, monitoring and evaluation of projects, keeping informed with national and regional priorities, to align investment initiatives with the overall country strategy; and managing investment budgets and timelines. Responsible for dissemination of information regarding the grievance process to ensure that it is widely understood among project affected settlements and logging and resolving grievances in a timely manner, in line with the grievance process and best practice principles. This includes undertaking regular visits to settlements or phone calls with community representatives to encourage use of the grievance process and maintaining a grievance log.
- Health, Safety and Environmental (HSE) Manager:** Engages with stakeholders on key health and safety issues. He is the key person to ensure compliance with set out standards and report on the

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOLPV-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 26 of 28

expected reports relating to health and safety matters. Takes the lead in inducting all stakeholders who visit the site on health and safety issues.

- **HR Advisor:** Engages with stakeholders on key labour related issues, to ensure compliance with the Malawi labour laws and the IFC Performance Standards. Takes lead in processing of all new employees including induction of all key documents that form the basis in addressing labour related grievances.
- **Gender Inclusion Specialist:** Engages and coordinates all key stakeholders on GBVH issues. Takes lead in ensuring all GBVH related grievances are handled using the referral pathway, that enables victims to quickly access support and justice.
- **Construction Manager:** Coordinates all construction related activities on site. Takes lead in engaging all technical stakeholders, giving updates on work progress.
- **Project Manager:** Takes lead in informing the stakeholders on the project milestones and key progress. Involved in logistics planning for the project and ensures all key activities relating to the community are communicated through the CLO to the relevant parties.
- **Project Coordinator:** Facilitates all key high-level engagements with the key governmental stakeholders (government departments and ministries).


8 Monitoring and Evaluation

In order to assess the effectiveness of this SEP and associated engagement activities, JCM will implement third party external monitoring of all HSE activities, including stakeholder engagement.

9 Reporting Mechanisms

All engagement activities throughout the life of the Project, will be documented and filed in order to track and refer to records when required and ensure delivery of commitments, made to stakeholders. The following stakeholder engagement records and documentation will generally be used by JCM:

- **Stakeholder engagement database /log:** Used to store, analyze and report on stakeholder engagement activities. It will be populated with details on information presented, audience questions, responses and commitments made and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings.
- **Meeting template:** Used to collect full meeting minutes to be filled with the stakeholder's database.

	Golomoti Solar PV Stakeholder Engagement Plan	Document No.	GOLPV-ES-RP-0012
		Date	2021-04-15
		Page Number	Page 27 of 28

- **Stakeholders list:** On-going updates to the list, including key contacts and contact details (telephone number, email addresses etc.) as additional stakeholders are identified and will include the following:
 - Central government and district authorities,
 - Local community leaders including village heads and the Traditional Authority;
 - Community representatives such as farmers, women, health workers and teachers;
 - Local industry (tourism and agriculture); and
 - International national or local environmental and social non - governmental organisations.
- **Grievance log:** To record all grievances received in order to address grievances and record whether it has satisfactorily been closed out, to identify patterns, avoid recurrent problems and improve the company’s overall social performance.
- **Media monitoring:** Includes monitoring of press and radio stories relevant to the project.

All documents will be reviewed on a regular basis in order to ensure that it is up to date and that required meetings are being held.



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