ESWATINI WATER SERVICES CORPORATION

NHLANGANO – SIPHAMBANWENI WATER SUPPLY INTEGRATION

STAKEHOLDER ENGAGEMENT PLAN (SEP)

July 24, 2019

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1. INTRODUCTION

1.1 Overview

This document is the Stakeholder Engagement Plan (SEP) which forms part of the environmental and social impact assessment (ESIA) for the Nhlangano – Siphambanweni Water Supply and Sanitation Project (NWSSP) – hereafter referred as “Project”. The Government of the Kingdom of Eswatini intends to apply for a loan from the World Bank's International Bank for Reconstruction and Development (IBRD) to finance the proposed Nhlangano – Siphambanweni Water Supply and Sanitation Project (NWSSP).

The proposed development objective of the Project is: “To improve access to improved water supply and sanitation services in targeted areas in Eswatini and strengthen the regulatory framework for national rural water supply and sanitation service provision.” The project seeks to: (i) achieve increased access to safely managed sanitation and basic hygiene management in the Shiselweni region; and (iii) support project management and strengthen sector institutions and policies for rural water to improve the long-term sustainability of rural water and sanitation service provision.

Figure 1: Project Map
1.2. Stakeholder Engagement Plan (SEP)

The scope of this SEP is proportionate to the nature and scale of the project and its potential risks and impacts. The Plan will be updated if needed to. As part of the project preparation, the Eswatini Water Supply Corporation (EWSC) is required to undertake and complete Environmental and Social Impact Assessment (ESIA) in accordance with the Eswatini Environment Act No. 5 of 2002, the World Bank Environmental and Social Framework (ESF) \(^1\) – Environmental and Social Standard-1 (ESS1 and ESS10) and, the World Bank Group Environmental, Health and Safety Guidelines. The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions. The SEP is a useful tool for managing communications between EWSC and its stakeholders.

The Kingdom of Eswatini and the World Bank value stakeholder engagement and input throughout the project cycle. Stakeholder engagement is a vital element in the national development strategy and approaches of the government as a tool of social inclusion, reducing disparities and inequalities in the society. The Government is an avid proponent of the Sustainable Development Goals (SDGs) and applying the principle of "leave no one behind" and recognizes the role of effective stakeholder engagement in ensuring equity and non-discrimination across all programming areas. Towards this end the following SDGs stands out:

- 16: promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels includes critical targets for achieving progress, including among others.
- 16.7 further states as its purpose to "ensure responsive, inclusive, participatory and representative decision-making at all levels – and
- 16.10 supports with "...ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements".

This SEP therefore, seeks to outline a technically and culturally suitable approach to stakeholders' consultation, disclosure and grievance redress. The main aim of the SEP is to improve and enable decision making and create an enabling environment that actively involves project-affected people and other stakeholders in an appropriate manner, and that these groups are provided

adequate opportunity to voice their views and concerns that may influence Project decisions. The SEP is thus a valuable tool for managing communications between EWSC and its stakeholders.

1.3. Regulations and requirements

Statute and Regulations
This SEP considers the existing institutional and regulatory framework within the context of the following Kingdom of Eswatini legal instruments:

- Water Services Act of 12 of 1992
- Environmental Management Act, 2002
- Industrial Relations Act, 2000
- Employment Act 1980
- Occupational Health and Safety Act, 2001
- Factories, Machinery and Construction Works Act, 1972
- Workman's Compensation Act 7, 1983
- Sexual Offences and Domestic Violence Act, 2018
- Children's Protection and welfare Act 6, 2012
- The Constitution of Eswatini, 2005

Stakeholder engagement within the project environment is guided by the Water Services Act 12 of 1992, Environmental Management Act, 2002, and the Constitution of Eswatini which stipulate that a person shall not be deprived of land without the due process of the law and where a person is deprived, that person shall be entitled to prompt and adequate compensation for any improvement on that land or loss consequent upon that deprivation unless otherwise provided by law. The water services act states that the Corporation may place any conduit below the ground across any land upon which no buildings have been constructed in consultation with the municipality, chiefdom, whichever is applicable.

World Bank Requirements
Stakeholder engagement is a requirement for Investment Project Financing (IPF) supported by the World Bank. This SEP is designed to fulfil the project’s requirements as stated in ESS-10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the NWSSP. Specific objective of this SEP is to promote inclusiveness by crafting project level engagement plan (s) that will:

- Identify stakeholders and build and maintain a constructive relationship,
• Assess the level of stakeholder interest and support for the project,
• Promote and provide means for effective and inclusive engagement with project-affected parties,
• ensure that appropriate project information on environmental and social risks and impacts is disclosed
• provide project-affected parties with accessible and inclusive means to raise issues and grievances
• Establish reporting and monitoring mechanisms to ensure the effectiveness of the SEP and periodical reviews of the SEP based on feedback.
• Define roles and responsibilities for the implementation of the SEP.
2. OVERVIEW OF STAKEHOLDER ENGAGEMENT

The Stakeholder Engagement processes will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible format and location, in a culturally appropriate manner. It will involve interactions between identified groups of people and to provide stakeholders with a platform to raise their concerns and opinions (e.g. by way of meetings, surveys, interviews and focus group discussions) and ensure that gathered information is taken into consideration in project design.

2.1. Stakeholder engagement during scoping phase

The project is an outcome of numerous consultations, working sessions and workshops that were held during project design and scoping stages. Specific consultations were conducted during the months of January – June 2019, and for the formulation of the SEP. As part of this engagement plan, the (Project Implementation Team (PIT) has undertaken preliminary stakeholder engagement in the three affected constituencies; Zombodze, Hosea, and Shiselweni 1. The Regional Development Team has also been engaged. The RDT also includes the Water, Sanitation and Hygiene Sector (WASH) in the region. A series of high-level technical meetings with the Eswatini Environment Authority (EEA), Ministry of Natural resources and the Department of Water, meetings with, local administrators, chiefs and traditional leaders. A total of one hundred and eighty-eight (188) stakeholders were engaged during the preliminary stakeholder engagements, 62 of which were females and 126 were males.

Key outcomes of these consultations were:

- Acquisition of information from relevant stakeholders (Eswatini Environment Authority, Department of Water, central and local government authorities, Ministry of Public Works and Transport) that assisted in the preparation of the ESIA report and the project design;
- Facilitates stakeholder understanding of how they might be affected and their potential role in NRAP implementation and impact management.
- Provided opportunities for stakeholders to express their opinions and concerns in relation to the ESIA, RPF and NRAP and for these opinions and concerns to be taken into account in the ESIA and NRAP -related management decisions and for the implementation of the resettlement action plan (RAP).

2.2. Stakeholder Engagement within the Context of NWSSP

The underlying principle of stakeholder engagement for the project will be that engagement shall be: a) free of manipulation, b) free of interference, coercion, and intimidation, and conducted
based on timely, relevant, understandable and accessible information, in a culturally appropriate format. It shall involve interactions between project’s stakeholders and shall provide stakeholders with an opportunity to raise their concerns and opinions and shall ensures that this information is taken into consideration when designing the project and making decisions. The project’s stakeholder’s engagement aims at creating a “social licence”\(^2\) and will depend on mutual trust, respect and transparent communication between EWSC/NWSSP and its stakeholders. It will thereby improve decision-making and environment and social performance. This could lead to managing costs and risks, enhancing reputation, avoiding conflict, improving corporate policy, identifying, monitoring and reporting on impacts, and managing stakeholder expectations.

### 2.3. Principles for effective stakeholder engagement

The project’s Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on “International Best Practice” include the following:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process;
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognised;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community’s beliefs, values and opinions.

### 2.4. Overall objectives

The overall objectives of SEP as stated in the ESS-10 are to:

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help ESWC identify

\(^{2}\) Social license refers to the ongoing acceptance of a company or industry’s standard business practices and operating procedures by its employees, stakeholders and the general public
stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.

- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow EWSC to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10 and; the Eswatini Environment Authority categorization throughout the project cycle.

2.5. Stakeholders engagement under the NWSSP

The project preparation, planning and implementation process shall be open. Transparent engagement between the NWSSP and project stakeholders is essential. The project “Stakeholders Engagement Plan” shall be prepared in collaboration with all stakeholders. The SEP shall inform and shall contain culture of inclusive process that shall be conducted throughout the project cycle. Ongoing and effective stakeholder engagement shall be deployed by the project with objective of improving the environmental and social sustainability. The engagement shall enhance project acceptance and encourage all stakeholder to make significant contribution to project design and implementation.
Where possible, stakeholder engagement plan for the project shall utilize already existing engagement structures within the national system - such as the communal meeting called by the chiefs, a method referred as "Inkhundla" meetings – to advance inclusiveness and participation in decision-making processes.

The Environmental and Social Risk Category (ESRC) of the NWSSP is **moderate**. Therefore, this SEP is prepared proportionate³ to the nature and scope of component 1 and 2 activities and the associated potential risks and impacts. The SEP is a living document and will be updated regularly.

³ The nature, scope and frequency of stakeholder engagement will be proportional to the nature and scale of the project and its potential risks and impacts. (ESS-10: Paragraph 6)
3. STAKEHOLDER IDENTIFICATION

3.1. Identification of Stakeholders

In fulfilment of its requirement, the EWSC, through the Project Implementation Team (PIT), have identified the stakeholders and will build and maintain a constructive relationship with each stakeholder. This was done in order to understand the stakeholder’s needs and expectation for engagement, their priorities and objectives in relation to the project and this was and will continue to be used to tailor engagements with these stakeholders. As part of this process it has been critical to identify vulnerable and disadvantaged groups such as women, people living with disabilities etc. This SEP has thus been used by the project to identify and will continue to identify stakeholder as: i) directly and/or indirectly project-affected parties, ii) interested parties, and those who have the potential to influence project outcomes. Among those identified include: project affected communities, NGOs, government agencies, academia, media, etc.
3.1.1. Project-affected parties

Project-affected parties under NWSSP include those households and communities that are likely to be impacted\(^4\) in the project area from Nhlangano town to Siphambanweni- where component 1 and 2 activities of the project are to be implemented. The project has identified project-affected parties’ interests and roles in the project’s design, implementation and decision-making processes. Project activities under this component are likely result in clearance of vegetation, crops, fences for the servitude. Additionally, other project activities such as treatment plants is likely to affect communal land used for grazing and subsistence farming and smallholder farms and may result in temporary restriction of access to homesteads, businesses and communal lands. Therefore, communication on the timing of works will be a crucial component of minimizing impacts. The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of EWSC. The direct responsibility of implementation is the responsibility of the project coordinator, the public affairs manager and the project social officer.

\(^4\) Actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.
3.1.2. Other interested parties

Other interested parties include individuals, groups, or organizations with an interest in the project. These groups of stakeholders will be interested in the NWSSP for variety of reasons. Their interest could be because of its location, its characteristics, and its impacts, or other matters related to the broader public interest. These parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

The project has and will continue to identify other interested parties' interest and roles in the project's design, implementation and decision-making process. The EWSC, through the NWSSP PIT, has undertaken preliminary stakeholder identification exercise and has developed a list of all the actors that may affect the project design and outcome. A total of 12 stakeholders groups have been identified. Relationship with each of these stakeholders is encouraging and shall be cultivated to create and maintain constructive engagement. Table 1 shows the preliminary finding of project stakeholders by categories:
<table>
<thead>
<tr>
<th><strong>Primary</strong></th>
<th><strong>Potential Role in the SEP</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ministry of Natural Resources and Energy</td>
<td>Line Ministry that needs to be informed about project progress.</td>
</tr>
<tr>
<td>Ministry of Public Works</td>
<td>Ministry responsible for use of road reserves and sleeves. They have to be engaged to give authority on use of road reserves and for construction of crossings.</td>
</tr>
<tr>
<td>Ministry of Health</td>
<td>Responsible for sanitation component of the project thus must be informed of progress of component 1 of the project and messaging around the project must be coordinated.</td>
</tr>
<tr>
<td>Ministry of Education</td>
<td>Responsible for beneficiary schools in the area. They must be engaged as potential customers for purposes of new connections.</td>
</tr>
<tr>
<td>Regional Development Team and Regional/Regional Administrator RA</td>
<td>Responsible for development in the region and they coordinate development activities in the region. They have to be informed about the project and attributes.</td>
</tr>
<tr>
<td>Project Affected Persons</td>
<td>Potential Project Affected Persons (PAPs) shall be consulted using the plan outlined in the Stakeholder Engagement Plan. This will be done throughout the project cycle. To ensure their views are incorporated in the RAP and project design.</td>
</tr>
<tr>
<td>Properties on Swazi Nation Land held in trust by His Majesty the King and Her Majesty the Queen.</td>
<td>Potential PAPs / shall be engaged and shall be informed about their choices and options – particularly on the project potential impact on structures and means of livelihoods.</td>
</tr>
<tr>
<td>Beneficiaries</td>
<td>Communities, Schools, Clinics, Tinkhundla and Government administration centres, Security Forces institutions and individuals to benefit from the project</td>
</tr>
<tr>
<td>Traditional Authorities</td>
<td>Responsible for affected properties on Swazi Nation Land</td>
</tr>
<tr>
<td>Department of Water Affairs</td>
<td>Department responsible for water supply in the rural areas.</td>
</tr>
<tr>
<td>WASH: UNICEF, FBOs NGOs – women groups, disabled people organizations, gender/GBV, eg Swaziland Action Group Against Abuse, NERCHA, CANGO, FODSWA, Nhlangano AIDS training information and counselling center</td>
<td>Development Community - water supply in the rural areas</td>
</tr>
<tr>
<td>Eswatini Environment Authority</td>
<td>Institution responsible for the protection of the environment.</td>
</tr>
<tr>
<td>Eswatini Royal Police Services</td>
<td>Responsible for public safety, law and order GBV case reporting</td>
</tr>
</tbody>
</table>
3.2. Stakeholders Analysis

Once stakeholders are identified by affected parties and by other interested parties, the next step will be to assess the level of stakeholder interest and support for the NWSSP. The assessment shall be geared toward identifying: i) stakeholders’ interests, ii) areas of potential risks and misunderstandings, iii) mechanisms to positively influence other stakeholders, iv) key people to be informed about the project during the preparation and implementation phases and, v) negatively impacts stakeholders as well as their adverse effects on the project.

A preliminary stakeholder analysis has been conducted during the preparation phase of NWSSP. The analysis has assessed the perception of the stakeholders regarding the potential changes (negative and positive) to be produced by the project. The project’s stakeholder’s analysis will be done on regular basis with the aim of tracking changes in their attitudes throughout the project cycle.

The EWSC, through its project team, shall continuously classify stakeholders based on: i) their power to influence and their interest on the project, ii) the legitimacy of each stakeholder’s relationship with the project, and iii) the urgency of the stakeholder’s claim on the project activities, - potential risks and impacts. According to the preliminary stakeholders analysis conducted by PIT, twelve stakeholders have been identified with potential interest and influence on the project. Eight out of the twelve stakeholders are high interest and high influence while four out of the twelve are high interest and low influence groups. The table below shows the outcome of the analysis.

**Table 2: Preliminary Stakeholders Analysis**

<table>
<thead>
<tr>
<th>SN #</th>
<th>Primary</th>
<th>Interest</th>
<th>Influence</th>
<th>Platform</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ministry of Natural Resources and Energy</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Monthly</td>
</tr>
<tr>
<td>2</td>
<td>Ministry of Public Works</td>
<td>High</td>
<td>High</td>
<td>Letter</td>
<td>Once off</td>
</tr>
<tr>
<td>3</td>
<td>Regional Development Team</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Quarterly</td>
</tr>
<tr>
<td>4</td>
<td>Property Project Affected Persons</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Regularly</td>
</tr>
<tr>
<td>5</td>
<td>His Majesty the King and Her Majesty the Queen.</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Regularly</td>
</tr>
<tr>
<td>6</td>
<td>Beneficiaries</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Biannually</td>
</tr>
<tr>
<td>7</td>
<td>Traditional Authorities</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Regularly</td>
</tr>
<tr>
<td>8</td>
<td>Eswatini Environment Authority</td>
<td>High</td>
<td>High</td>
<td>Meeting</td>
<td>Quarterly</td>
</tr>
<tr>
<td>9</td>
<td>Department of Water Affairs</td>
<td>High</td>
<td>Low</td>
<td>Meeting</td>
<td>Regularly</td>
</tr>
</tbody>
</table>
The objective of the stakeholders’ analysis was to determine each stakeholder’s ability to influence NWSSP design and its implementation. The purpose of the analysis and preliminary engagement is to determine and source the opinions of the most powerful stakeholders to help define the project at its preliminary stage. It is also to build an understanding of the stakeholders early on and to ensure they fully grasp and understand the project. On the basis of this preliminary finding, the communication strategy and the coordination mechanism to be developed by NWSSP shall incorporate strategies to address elements outlined below:

- **Engaging high interest and high influence stakeholders:** The high interest and high influence stakeholders are listed from 1-8 in the stakeholders analysis table above. The plan is to fully engage this group and apply all effort to ensure that they are satisfied and fully informed of the project at all times. This will be done on the NWSSP by: i) focusing efforts on these groups of stakeholders throughout the project cycle; ii) involving most influential stakeholder(s) in NWSSP governance decision making bodies and, iii) engaging them and consulting them regularly. Annual, bi-annual and quarterly engagement plan targeting these groups of stakeholders shall be incorporated into the NWSSP annual work plan.

- **Engaging high interest and low influence:** The high interest and low influence stakeholders are listed from 9-12 in the stakeholders’ analysis table above. The plan is to keep this group informed, ensuring that no major issues arise because of the project. The project will maintain this group’s interest in the NWSSP, particularly in component 2. This will done by: i) involving this groups of stakeholders in the implementation arrangement of component 2 of the project, ii) tapping into their interest and use them as a goodwill ambassadors while advance component 2 works in the respective influence areas, iii) keeping them in the loop on decision that will influence component 2 design and implementation.

### 3.3. Engagement plan

The goal of the project’s Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect their livelihoods and properties.
While advancing effective, inclusive and meaningful engagement with project-affected parties, the EWSC, through PIT, shall conduct consultations that will ensure two-way communication processes.

The objective of the engagement and consultations plan under the project is to:

(a) Begin early in the project planning process to gather initial views on the project proposal and inform project design;

(b) Encourage stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;

(c) Ensure that stakeholders have an understanding of how the project is likely to affect them;

(d) Ensure consistency in messaging;

(e) Continue engagement on an ongoing basis as risks and impacts arise and manage stakeholders’ expectations;

(f) Ensure prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;

(g) Consider and respond to feedback;

(h) Support active and inclusive engagement with project-affected parties;

(i) Ensure that consultation(s) is/are free of external manipulation, interference, coercion, discrimination, and intimidation; and

(j) Ensure consultation(s) is/are documented and disclosed by the ESWC/NWSSP.
3.3.1 Key principles
The SEP will ensure that the following key principles are applied to all engagement activities:

- Ensure that engagement is free from coercion, undertaken prior to key decisions and informed by provision of objective and meaningful information, and that feedback is provided to stakeholders after engagement has concluded.
- Timing and number of engagement events designed to maximise stakeholder involvement and to avoid disruption to the ‘daily business’ of local stakeholders and also stakeholder ‘fatigue’;
  - Engagement events to occur in line with the SEP schedule so that there is clear linkage between engagement activities and the project stages;
  - Ensure that engagement is accessible and managed so that it is culturally appropriate, adequate and timely information and opportunities are provided to all stakeholders to be involved/contribute.

The plan for engagement clearly indicates: a) the project stage at which the engagement should take place, b) the objective of the engagement, c) key activities to be undertaken at each project's stage, d) the target stakeholder(s) to be engaged, e) the venue of the engagement and, f) the date of the engagement. The table below provides the planned engagements under NWSSP:

**Table 3: Stakeholder Engagement Activities**

<table>
<thead>
<tr>
<th>Stage</th>
<th>Objective</th>
<th>Key Activities</th>
<th>Target Stakeholder</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preliminary Engagements</td>
<td>• To gain a preliminary understanding of the scope of the Project,</td>
<td>• Field visit; and Stakeholder identification process.</td>
<td>• Government&lt;br&gt;• Government parastatals/agencies&lt;br&gt;• Local/traditional communities Vulnerable/disadvantaged Groups</td>
<td>March 2019&lt;br&gt;</td>
</tr>
<tr>
<td></td>
<td>appropriate and legislated engagement requirements and relevant stakeholders.</td>
<td></td>
<td></td>
<td>Monthly</td>
</tr>
<tr>
<td>Stage</td>
<td>Objective</td>
<td>Key Activities</td>
<td>Target Stakeholder</td>
<td>When</td>
</tr>
<tr>
<td>------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Coping Engagement      | • To meet key stakeholders and introduce them to the Project and ESIA Process; • To disclose the Project in the public domain to all interested and affected stakeholders; • To gather issues of concern and through this identify a list of potential impacts; • To consult key stakeholders on the next steps in the ESIA process; • To generate feedback on the Draft Scoping Report, including the scope, approach and key issues to be investigated further for the ESIA. | • Meetings with key stakeholders to facilitate the broader stakeholder engagement process  
• Dissemination of engagement materials (background information document, posters, media notices etc.)  
• Consultation on the proposed Project and associated ESIA through meetings and workshops with identified stakeholders. Details may include:  
  o Nature, purpose and scale of the proposed project  
  o ESIA & stakeholder engagement process  
• Confirmation of issue identification and feedback from stakeholders;                                                                                     | • Government  
• Government parastatals/agencies  
• Local/traditional communities  
• Vulnerable/disadvantaged Groups  
• Non-government organizations (NGOs);                                                                                                                    | •                                                                                                           |
| ESIA Disclosure        | • To discuss the identified impacts and proposed mitigation measures with                                                                                                                                  | • Dissemination draft ESIA Report to all stakeholders.  
• Copies of the ESIA report                                                                                                                                                                      | • Government  
• Government parastatals/agencies  
• Local/traditional communities                                                                                                                          | August 2019                                                                                                                                                     |
<table>
<thead>
<tr>
<th>Stage</th>
<th>Objective</th>
<th>Key Activities</th>
<th>Target Stakeholder</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>stakeholders allowing for their input; and • To provide stakeholders with the opportunity to comment on the Draft ESIA report.</td>
<td>will also be distributed in public buildings in the vicinity of the site of the proposed project. • Availability of the draft ESIA Report will be advertised through print and electronic media for public review. • Consultation on the draft Impact Assessment Report. This will include: ○ Identification of impacts in the draft ESIA and proposed mitigation; ○ Identification of stakeholder concerns and opinions on the impacts identified; ○ Involvement of stakeholders in assessing the efficacy and appropriat</td>
<td>• Vulnerable/disadvantaged Groups • Business Community • Contractors &amp; Contract Workers • Non-government organizations (NGOs);</td>
<td></td>
</tr>
<tr>
<td>Stage</td>
<td>Objective</td>
<td>Key Activities</td>
<td>Target Stakeholder</td>
<td>When</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
<td>------------------------</td>
</tr>
</tbody>
</table>
| Draft Resettlement Policy Framework (RPF) preparation                | To share draft policy framework based on national legislations, current practices in the country and Environmental and Social Standards of the Bank and finalised based on feedback and inputs | Consulations on draft RPF to all stakeholders. Copies of the draft RPF will also be distributed in public buildings in the vicinity of the site of the proposed project and uploaded on EWSC website. Availability of the draft RPF Report will be advertised through print and electronic media for public review. Consultation on the draft RPF. This will include: Identification of impacts categories | Government, Government parastatals/agencies, Local/project affected communities, Vulnerable/disadvantaged Groups, Business Community, Royal Kraals and Chiefs, Regional administration office, Non-government organizations (NGOs); Farmers, women groups | • March - June 2019  
• August 2019  
• Monthly |
<p>| Draft RPF disclosure and stakeholder consultation                     |                                                                                          |                                                                                                                                                                                                                                                                                                                                 |                                 |                        |</p>
<table>
<thead>
<tr>
<th>Stage</th>
<th>Objective</th>
<th>Key Activities</th>
<th>Target Stakeholder</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>based on preliminary survey report and possible entitlements and eligibility criteria; Key principles of resettlement and broad institutional arrangement.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of stakeholder concerns and opinions on the contents of the RPF;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Involvement of stakeholders in assessing the appropriateness of the proposed resettlement principles, impact categories, entitlements; institutional arrangement for preparation and implementation of RAP.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Assess adequacy of RPF during ESIA and RAP preparation</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of revisions or additions to the draft RPF where necessary.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resettlement Action Plan (RAP) disclosure and stakeholder consultation</td>
<td>To share draft RAP based on RPF and specific impact area as per designs subsequently finalise based on</td>
<td>Consultations on draft RPF preparation</td>
<td>Government, project affected communities</td>
<td>January - June</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Consultations on draft RAP preparation</td>
<td>Government</td>
<td>August 2019</td>
</tr>
<tr>
<td>Stage</td>
<td>Objective</td>
<td>Key Activities</td>
<td>Target Stakeholder</td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td>-------------------------</td>
<td>-------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>feedback and inputs</td>
<td>Consultations on entitlement matrix</td>
<td>Dissemination of cut-off date and census survey of all affected through structured questionnaire FGDs and community level meetings facilitated by Chiefs and Community Liaison Officers Dissemination of draft RAP to all stakeholders. Use of Leaflets on non-technical summary of RAP and folk media for the project affected Copies of the RAP will also be distributed in public buildings in the vicinity of the site of the proposed project and uploaded on EWSC website. Availability of the draft RAP Report will be advertised through print and electronic media for public review. Consultation on the draft RAP. This will include:</td>
<td>Government parastatals/agencies Local/project affected communities Vulnerable/disadvantaged Groups Business Community Royal Kraals and Chiefs Regional administration office Non-government organizations (NGOs); Farmers, women groups</td>
<td></td>
</tr>
<tr>
<td>Stage</td>
<td>Objective</td>
<td>Key Activities</td>
<td>Target Stakeholder</td>
<td>When</td>
</tr>
<tr>
<td>-------</td>
<td>-----------</td>
<td>----------------</td>
<td>--------------------</td>
<td>------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of impacts categories based on specific impact area based on designs, entitlements and eligibility criteria; Key principles of resettlement and specific institutional arrangement for implementation and GRM.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of project affected concerns and opinions on the identified impacts, RAP implementation Plan and project schedule;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Involvement of stakeholders in assessing the appropriateness of the identified impacts, list of PAPs, entitlement options; institutional arrangement for implementation of RAP and GRM.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of revisions or additions to the draft RAP where necessary.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 4: Stakeholder Engagement Communication Plan

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Communication</th>
<th>Method of Engagement</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ministry of Natural Resources and Energy</td>
<td>Project Concept Note Preparation</td>
<td>Field Missions</td>
<td>Project Approval and Contracting</td>
</tr>
<tr>
<td>Ministry of Finance</td>
<td>Project Concept Note Preparation</td>
<td>Field Missions</td>
<td>Project Approval and Contracting</td>
</tr>
<tr>
<td>Ministry of Commerce</td>
<td>Discussion on future plans of commercial and industrial development</td>
<td>-Formal meetings</td>
<td>-Email</td>
</tr>
<tr>
<td>Ministry of Health</td>
<td>Project brief</td>
<td>Discussion with the related department on issues of health relevant to the project</td>
<td>Record discussions</td>
</tr>
<tr>
<td></td>
<td>Project Brief and request for categorization</td>
<td>Project brief</td>
<td>Frequency</td>
</tr>
<tr>
<td>------------------------</td>
<td>---------------------------------------------</td>
<td>---------------</td>
<td>-----------</td>
</tr>
<tr>
<td><strong>Deputy Prime Minister's Office</strong></td>
<td>Disseminate technical information</td>
<td>- Formal meetings</td>
<td>Frequency yet to be determined</td>
</tr>
<tr>
<td></td>
<td>Record discussions</td>
<td>- Email</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Posters</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Press Statements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Project brief document</td>
<td></td>
</tr>
<tr>
<td><strong>Ministry of Tourism and Environmental Affairs</strong></td>
<td>Disseminate technical information</td>
<td>- Formal meetings</td>
<td>Frequency yet to be determined</td>
</tr>
<tr>
<td></td>
<td>Record discussions</td>
<td>- Email</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Posters</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Press Statements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Project brief document</td>
<td></td>
</tr>
<tr>
<td><strong>Ministry Works and Transport</strong></td>
<td>Allow group to comment - opinions and views Build impersonal relation with high level stakeholders Site visits</td>
<td>- Formal meetings</td>
<td>Frequency yet to be determined</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Email</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Posters</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Press Statements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Project brief document</td>
<td></td>
</tr>
<tr>
<td><strong>Eswatini Environmental Authority (EEA)</strong></td>
<td>Site visits</td>
<td>- Formal meetings</td>
<td>January 2019</td>
</tr>
<tr>
<td></td>
<td>Periodic compliance reports</td>
<td>- Email</td>
<td>May 2019</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Site visits</td>
<td>September 2019</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Posters</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Press Statements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Project brief documents</td>
<td></td>
</tr>
<tr>
<td>Town Councils of Nhlangano, Hluthi, and Lavumisa</td>
<td>Project Brief and discussion of council procedures for servitude acquisition Compliance and Monitoring meetings</td>
<td>-Formal meetings -Email -Workshops -Site visits -Posters -Press Statements -Project brief documents</td>
<td>May 2019 On-going</td>
</tr>
<tr>
<td>Regional Administrator</td>
<td>Preliminary Meeting Present information on the Project Induction and trainings on the Project Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Resettlement engagement Meetings (Refer to RPF and RAP)</td>
<td>-Formal meetings -Email -Workshops -Site visits -Posters -Press Statements -Project brief documents</td>
<td>March 2019 (Annex I) On-going and frequency yet to be determined</td>
</tr>
<tr>
<td>Eswatini Royal Police Service</td>
<td>Distribute non-technical information Facilitate meetings with presentations and PowerPoint Allow the group to provide their views and opinions especially in issues of the keeping order during project in cases where there are disputes.</td>
<td>-Formal meetings -Site visits -Posters -Press Statements</td>
<td>Frequency yet to be determined</td>
</tr>
<tr>
<td>Eswatini National Trust Commission (ENTC)</td>
<td>Present information on the Project</td>
<td>-Formal meetings</td>
<td></td>
</tr>
</tbody>
</table>
| Eswatini Tourism Authority | Allow group to comment – opinions and views  
Build impersonal relation with high level stakeholders  
Site visits where necessary | -Site visits  
-Posters  
-Press Statements | Frequency yet to be determined |
|---------------------------|---------------------------------------------------------------|-------------------------------------------------|----------------------------------|
| Chiefs (Community Leaders) | Preliminary Meeting  
Present information on the Project to the community leaders  
Induction and trainings on Project  
Allow the group to provide their views and opinions  
Build relationship with the communities, especially those impacted  
Distribute non-technical information  
Facilitate meetings with presentations, PowerPoint, posters etc.  
Resettlement engagement Meetings (Refer to RPF and RAP)  
Site visits | -Formal meetings  
-Interviews  
-Email  
-Workshops  
-Site visits  
-Public Meetings  
-Posters  
-Press Statements | End of March 2019  
On-going and frequency yet to be determined |
| Local Communities | Present Project information to a large group of stakeholders, especially affected community members. | - Focus group discussions - Interviews - Public meetings - Workshops - Site visits - Posters - Press Statements | End of March 2019
| | Allow the group to provide their views and opinions. Build relationship with the communities, especially those impacted. | | May - June 2019
| | Distribute non-technical information and in a culturally appropriate manner. | | On-going and frequency yet to be determined
| | Facilitate meetings with presentations, PowerPoint, posters etc. | | |
| | Resettlement engagement Meetings | | |
| | • Swaziland Action Group Against Abuse (SWAGAA)  
• Coordinating Assembly for NGO’s (CANGO)  
• Youth Organisation/Associations  
• Women Organisations/Associations  
• Organisations for disabilities  
• Organisations for prevention of Gender based violence and Violence against Children  
• Organisations on HIV  
• Organisations on labour rights  
• Eswatini National Youth Council  
• WASH | Distribute non-technical information  
Facilitate meetings with presentations and PowerPoint  
Allow the group to provide their views and opinions  
Request guidance on how to handle issues related to their target groups as NGOs especially the vulnerable parties likely to be affected. | - Formal meetings - Email - Workshops - Site visits - Posters - Press Statements | Frequency yet to be determined |
3.3.1. Vulnerable and disadvantaged stakeholder groups
There is a range of vulnerable/disadvantaged groups in the project area such as: poor, female and child headed households, orphans, people living with disabilities, youth and those who are likely to be disproportionately affected by the project. Vulnerable or disadvantaged groups within the project environment refers to individual/s who will be unable to anticipate, cope with, resist and recover from external factors and shocks such as the impacts of the project. This may include children, elderly, socioeconomically disadvantaged, orphans, the elderly and retired, destitute and street children, widowed women and people with disabilities etc are considered the most vulnerable groups in Eswatini. The initial consultations and ESIA processes identified vulnerable/disadvantages groups (e.g. women and people living with disabilities). Attention is therefore being paid to this group to ensure that they are not excluded from consultations and project benefits. Separate focus group discussions were conducted for women. These discussions with the vulnerable/disadvantaged groups likely to be affected by the Project aim to provide opportunities for ground investigation on potential social impacts as a result of the construction of the water supply infrastructure.

In the preliminary engagements the women groups highlighted;
- The need to ensure that the water kiosks are centrally placed and reasonably distributed to allow for ease of access.
- Highlighted unemployment issues and the need for fair consideration by the contractor of women in the jobs to be available.
- Possible impacts such as interaction of communities with construction workers.
- Project scope review to cover nearby areas that were also not covered by the EU project.

However, these groups will be fully identified during the ESIA exercise. This SEP therefore ensures that these groups are given special consideration during consultations. The traditional local leaders and community liaison officers will assist in identifying and encouraging effective participation Vulnerable /disadvantages groups in group discussions throughout the project phases. To ensure that continuous consultations with local communities is inclusive of disadvantaged groups, presentations will be conducted in siSwati because many community members may be illiterate. Where necessary, additional formats such as location sketches will be used to enhance understanding. The assistance of community leaders will be needed to encourage effective representation of Vulnerable /disadvantages groups in group discussions throughout the project phases.

3.4 Information disclosure
The objective of the information disclosure plan is to ensure that appropriate project
information, particularly activities related to component 1 and 2 on environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. The draft ESIA, RPF, SEP and LMP are expected to be disclosed before end June 2019.

The EWSC, through NWSSP PIT, shall disclose project information to project-affected and other interested stakeholder mapped during stakeholders identification exercise. Potential risks and impacts expected from component 1 and 2 of the project and potential opportunities that may emerge shall be explained and discussed during consultation(s).

The EWSC, through NWSSP PIT, shall provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design:

(a) The purpose, nature and scale of the NWSSP, particularly activities associated with component 1 and 2;
(b) The duration of proposed project activities;
(c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these;
(d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
(e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported;
(f) The process and means by which grievances can be raised and will be addressed.

The EWSC, through the NWSSP PIT, shall make special efforts to inform, engage with, and understand disadvantaged or vulnerable groups with regard to risks and impacts associated with component 1 and 2 activities and the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances. The project shall be responsive to requests for information from project-affected parties and other interested parties throughout the project cycle. Project level information sharing strategy and communication mechanism shall be developed by NWSSP and be put in place to make information available on a continuous basis. The below stakeholders’ engagement techniques shall be utilized:

---

5 This stakeholder plan shall be updated to include information disclosure requirements in the entire project cycle
## Table 5: Stakeholder Engagement Techniques

<table>
<thead>
<tr>
<th>Engagement Technique</th>
<th>Stakeholders</th>
<th>Appropriate application of the technique</th>
</tr>
</thead>
<tbody>
<tr>
<td>Correspondences (Phone, Emails)</td>
<td>PIT Ministry of Natural Resources</td>
<td>Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up</td>
</tr>
<tr>
<td></td>
<td>PAP’s</td>
<td>Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings</td>
</tr>
<tr>
<td></td>
<td>Ministry of Natural Resources and Energy</td>
<td>Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions</td>
</tr>
<tr>
<td></td>
<td>Ministry of Finance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ministry of Commerce</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ministry of Health</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deputy Prime Minister’s Office</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eswatini National Trust Commission (ENTC)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eswatini Royal Police Service</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Town Councils of Nhlangano, Hluthi, and Lavumisa</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ministry of Tourism and Environmental Affairs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NGO’s</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Communities</td>
<td>Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.</td>
</tr>
<tr>
<td></td>
<td>Regional Development Committee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Beneficiaries</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NGOs</td>
<td>Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</td>
</tr>
<tr>
<td></td>
<td>FBO’s</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Youth</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Physically Challenged</td>
<td></td>
</tr>
<tr>
<td>EWSC website</td>
<td>Public Service Providers</td>
<td>Present project information and progress updates</td>
</tr>
<tr>
<td>Direct communication with affected crops/asset owners (Road component only)</td>
<td>PAPs</td>
<td>Share information on timing of road clearance</td>
</tr>
<tr>
<td>Road signs</td>
<td>Municipalities Ministry of Works and Transport Affected communities</td>
<td>Share information on project activities Reminders of potential impacts (e.g. for road clearance activities; remind crop owners to harvest crops and replant outside the road reservation)</td>
</tr>
<tr>
<td>Project leaflet, media (newspapers, radio etc)</td>
<td>Public Media Affected Communities</td>
<td>Brief project information to provide regular update Site specific project information.</td>
</tr>
</tbody>
</table>

The disclosure and consultation activities will be designed along with some guiding principles:

- Consultations must be widely publicized particularly among the project affected stakeholders/communities, preferably 2 weeks prior to any meeting engagements.
- Allow non-technical information summary to be accessible prior to any event to ensure that people are informed of the assessment and conclusions before scheduled meetings.
- Location and timing of meetings must be designed to maximize stakeholder participation and availability.
- Information presented must be clear, and non-technical, and presented in both local language and mannerism.
- Facilitate in a way that allow stakeholders to raise their views and concerns.
- Issues raised must be answered, at the meeting or at a later time.

There are various avenues that will be employed in the stakeholder engagement process:

i. **Community Forums:** To facilitate effective consultation with the communities during implementation of the project, the Project Manager (PM), establishes community forums through local community established leadership to disseminate project information to community members.

ii. **Local Government:** Government representatives (Government Representatives on respective Tinkhundla Centres, District/Town Officers, Chief’s Royal kraals, etc) as a channel to disseminate information on the project.

iii. **Information Boards:** Notice boards are effective mechanisms to inform the communities and wider audiences about the project. These can be installed on specific areas of impact (communities).

iv. **Media:** Newspapers commonly read in the project area will be used notify the general public.
3.5. Overview of public consultation processes for preparation of draft ESIA and RPF

As part of its engagement plan the PIT undertook preliminary stakeholder consultations in the three affected constituencies; Zombodze, Hosea, and Shiselweni 1, during the preparation of the draft RPF and ESIA. The Development Teams from each benefiting community were also engaged. Meetings were also held with the Ministry of health, which is driving the sanitation part of the project. Consultations were conducted at Regional level (Shiselweni Region Development Team) and further condensed to Constituency level (Zombodze Emuva Inkhundla Development Team, Hosea Inkhundla Development Team and Shiselweni 1 Development Team). Initial consultations were carried out at both Regional and Constituency Level. At the Regional level, the following groups of people were inclusive; constituency leadership (Bucopho, Tindvuna), development partners (World Vision, Red Cross), security forces (Police, Correctional, USDF), the youth (ENYC) and Government (CTA, Education, Commerce, Rural Water, Health). For the Constituency Level, these groups of people were consulted; the youth, water committees, WASH community representatives, social workers (Bagcugcuteli), traditional authorities and community police. The public consultation process began in March 14, 2019, Annex 1 presents detailed records of these consultations.

The primary aims of the public participation process were:

▪ To inform Interested and Affected Parties (I&APs) and key stakeholders of the proposed application and environmental studies;
▪ To initiate meaningful and timeous participation of I&APs;
▪ To identify issues and concerns of key stakeholders and I&APs with regards to the application for the development (i.e. focus on important issues);
▪ To promote transparency and an understanding of the project and its potential environmental (social and biophysical) impacts (both positive and negative);
▪ To provide information used for decision-making;
▪ To provide a structure for liaison and communication with I&APs and key stakeholders;
▪ To ensure inclusivity (the needs, interests and values of I&APs must be considered in the decision-making process);
▪ To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance;
▪ To anticipate and avoid risks and impacts and where possible, minimize or reduce risks to acceptable levels;
▪ To focus on issues relevant to the project, and issues considered important by I&APs and key stakeholders; and
▪ To provide responses to I&AP queries.

A total of five consultative meetings were held as illustrated in the Table 6:
Table 6: Consultation meetings

<table>
<thead>
<tr>
<th>Meeting</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shiselweni Regional Development Team</td>
<td>14 March 2019</td>
</tr>
<tr>
<td>Zombodze Emuva Constituency</td>
<td>16 March 2019</td>
</tr>
<tr>
<td>Hosea Constituency</td>
<td>23 March 2019</td>
</tr>
<tr>
<td>Shiselweni 1 Constituency</td>
<td>30 March 2019</td>
</tr>
<tr>
<td>Hluthi Sub-regional Offices (Scoping Meeting)</td>
<td>04 April 2019</td>
</tr>
</tbody>
</table>

During these consultations the following information was provided;

- Provide background information about the proposed water project (project brief including purpose, nature and scale of the project; duration of proposed project activities;
- Gather feedback and identify stakeholders’ interests
- Address social, technical and environmental issues
- Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts presenting brief differentiated measures taken to avoid and minimize these;
- Highlight the ways in which stakeholders can participate;
- The proposed set up of public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
- The process and means by which citizen feedback will be raised and be addressed.

Additionally, one women focus group discussion was conducted to understand female specific considerations for the project, determine current water challenges (as women and children are mainly responsible for households water collection), discuss the proposed project designs and placement of water kiosks where best benefit may be derived. This meeting, particularly sought women’s perceptions and expectations with respect to the proposed project and in particular the location of kiosks along the project area for ease of accessibility. They were also asked to indicate the main challenges they face as a result of the unavailability of potable water in the area. Issues of sanitation were also discussed as perpetuated by the lack of clean water. One focus group meeting has been held thus far, with women, more to be conducted during the RAP and ESIA preparation.

In the preliminary engagements the women groups highlighted;

- The need to ensure that the water kiosks are centrally placed and reasonably distributed
to allow for ease of access.

- Highlighted unemployment issues and the need for fair consideration by the contractor of women in the jobs to be available.
- Possible impacts such as interaction of communities with construction workers.
- Project scope review to cover nearby areas that were also not covered by the EU project.

### 3.6. Monitoring Stakeholder Engagement Activities

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and that stakeholders have been meaningfully consulted throughout the process. The final SEP will have a Monitoring and Evaluation (M&E) action plan which will guide all M&E activities related to the SEP. There are two key ways in which the stakeholder engagement process, as will be provided for in the M&E action plan, will be monitored:

### 3.7. Review of Engagement Activities in the Field

During engagement with stakeholders the ESIA team will assess meetings by asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly. Conduct debriefing sessions with the engagement team while in the field. This will help to assess whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.

The use of engagement tools developed through the ESIA engagement include:

a) Stakeholder database
b) Issues and Response table, and
c) Meeting records of all consultations held.

### 3.8. Reporting Stakeholder Engagement Activities

Performance will be reviewed following the engagement sessions conducted in the field. In addition, there will be opportunity to review and assess performance in-between the engagement sessions depending on the level of feedback received from stakeholders during these periods.

Evaluation of performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance, indicators will be crafted around the following areas:

- Materials disseminated: types, frequency, and location
- Place and time of formal engagement events and level of participation including specific
stakeholder groups (e.g. women, youth, community leaders)

- Number of comments received on specific issues, type of stakeholder and details of feedback provided
- Numbers and type of stakeholders who come into contact with the Project team by mail, telephone and any other means of communication
- Meeting minutes, attendance registers and photographic evidence
- Comments received by government authorities, community leaders and other parties and passed to the Project
- Numbers and types of feedback and / or grievances and the nature and timing of their resolution, and

The extent to which feedback and comments have been addressed and have led to corrective actions being implemented.
4. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE

This SEP needs to be updated and refined throughout the lifecycle of the Project. During this process the focus and scope of the SEP will be updated to ensure that the EWSC addresses external changes and adheres to its strategy.

The key life-cycle phases to be considered when implementing stakeholder engagement are briefly discussed below.

- Design/Plan: the process of ensuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements;
- Implementation: the process and activities are implemented as planned

4.1. Stakeholder Engagement and Project Cycle

This SEP will be refined and updated throughout the lifecycle of the Project. During this process the focus and scope of the SEP will be updated to ensure that the EEC addresses external changes and adheres to its strategy.

The key life-cycle phases to be considered when implementing stakeholder engagement are briefly discussed below.

- Design/Plan: the process of ensuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements;
- Implementation: the process and activities are implemented as planned

Stakeholder engagement within the project preparation and implementation process is critical for supporting the project’s risk management process, specifically the early identification and avoidance/management of potential impacts (negative and positive) and cost-effective project design. Stakeholder engagement is an on-going process throughout the life of the project:

- Planning/design (including disclosure);
- Construction
- Commissioning

4.2. Resources and responsibilities

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function at EWSC are described. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within EWSC PIT, its regional offices and local sub-contractors. The roles and responsibilities of the organizations are presented below. The Project Implementation Unit (PIT) will be responsible for the preparation and physical implementation of the project. This unit will
be under the oversight of the Technical Services Director comprising the following staff: Project Manager, Procurement Officer, Project Engineer, Compliance Officer, Social Development Officer and an Environmental Officer.

While EWSC may decide to adapt this structure according its needs, it is emphasized that the various components listed and then described below should be represented in the organizational structure in order to successfully implement the SEP:

- **PM**, who is responsible for overseeing and coordinating all activities associated with stakeholder engagement;
- **Social Standards Officer (SSO)** who will be responsible for implementing community engagement activities; and
- **Administration**, who will be responsible to manage all activities related to database, documents and logistics; and integration/support, which relates to the interaction with other departments, initiatives or projects.

The **Social Development Officer** who is part of the PIT will manage all social development aspects of the project, oversee all planned stakeholder engagement activities or in process of being implemented.

EWSC through the assistance of the Traditional authorities will hire **Community Liaison Officers** who will be the direct contact for PAP in the local communities. The Community Liaison officers will facilitate stakeholder engagements at community level under the supervision of the SO. They will provide EWSC with assistance during consultations, identification of PAPs, and conducting of interviews, where required. The CLO also works with the EWSC considers the Community Liaison Officers to be an extension of the PIT and therefore will be entitled to a stipend according to traditional practices for similar community office bearers and therefore will not be salaried like the PIT staff.

Responsibilities of the SO include the following:

- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA;
- Oversee all stakeholder engagement related activities for the Project;
- Manage the grievance mechanism;
- Interact with related and complementary support activities that require ad hoc or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
- Liaise with the project managers to ensure that stakeholder engagement requirements/protocols are understood; and
- Proactively identify stakeholders, project risks and opportunities and inform the PM /
senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

The **engineering company** (to undertake detailed designs) shall be recruited to provide institutional capacity and support to the Project Implementation Unit (PIT) with: (a) overall project management and supervision including procurement, design, contract management; and (b) oversee the overall implementation, monitoring, and reporting of safeguards aspects such ESMPs, LMP, SEP and RAPs. After familiarizing themselves with the project area through reading and consultations with the EWSC Project Unit, the consultants will design appropriate questionnaires intended for data collection at project location levels. The consultant will design questionnaires for data collection from various households, individual farm units, depending on the nature of information source. The RAP development, as well as monitoring and implementation, will be done in close collaboration with all impacted households, affected community members, chiefs, Royal kraal council members and other interested and affected parties. The consultations will be on-going and an integral part of the project as set out in this RPF.

4.2.1. Integration and support
Since stakeholder engagement activities will influence other departments or require their inputs, the SSO needs to ensure that the various managers are included or kept informed on the stakeholder engagement process. Decisions taken by managers might have a direct or indirect impact on communities which would need to be communicated at the appropriate time. For example, the Project’s Engineering or Site Manager might decide to drop part of the roads which could potentially have an impact on communities. Anticipated stakeholder engagement roles for the various decision-makers are outlined below:

- **Project Manager**: this manager will be responsible to sustain relationships and communicate with Government entities and the media. These engagements will be required throughout the Project’s life and decisions taken as a result of these engagements could potentially impact EWSC’s relationships with communities e.g. site selection or compensation agreements;

- **Contract Manager**: opportunities for contractor/employment are a key concern for community members. They are also very sensitive about appointing people from local community’s opposed to communities located further away from the project site. This requires that a defined process of employment be developed and clearly communicated to community leadership and members.
In order to advance the Project the PIT will work collaboratively with some of the ESWC departments and stakeholders such as (i) Purchasing, (ii) Finance, (iii) Customer Services, (iv) Technical Services Department, (v) Strategic Services, (vi) Tender Committee, (vii) Public Affairs Department (including the SO). The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarised below.

Table 7: Internal Departments

<table>
<thead>
<tr>
<th>EWSC Departments</th>
<th>Role</th>
<th>Interest</th>
<th>Influence</th>
<th>Coordination</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchasing</td>
<td>coordinate overall procurement under the project and prepare and revise Procurement Plans as needed</td>
<td>High</td>
<td>High</td>
<td>Hold meetings to update procurement plans and review delivery timelines that have high project risk impact</td>
<td>Regularly</td>
</tr>
<tr>
<td>Finance</td>
<td>account for the deposits and withdrawals of project funds with Financial institution(s) and perform the audits and provide financial reports in accordance with the World Bank rules and guidelines</td>
<td>High</td>
<td>High</td>
<td>Hold meetings to evaluate project financial performance</td>
<td>Regularly</td>
</tr>
<tr>
<td>Public Affairs</td>
<td>Work with the Social Officer to conduct stakeholder engagement and project disclosure and outreach activities</td>
<td>High</td>
<td>Low</td>
<td>Hold meetings to review and update stakeholder engagement plan</td>
<td>Regularly</td>
</tr>
<tr>
<td>EWSC Departments</td>
<td>Role</td>
<td>Interest</td>
<td>Influence</td>
<td>Coordination</td>
<td>Frequency</td>
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</tr>
<tr>
<td>Technical Services</td>
<td>Ensure timely and efficient construction and commissioning of pipeline, reservoirs and pump stations.</td>
<td>High</td>
<td>High</td>
<td>Hold project progress meetings to highlight project challenges and risks</td>
<td>Regularly</td>
</tr>
<tr>
<td>Department</td>
<td></td>
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</tr>
<tr>
<td>Strategic Services</td>
<td>Recruitment of PIT staff such as the Social Officer and Procurement Officer</td>
<td>Medium</td>
<td>Medium</td>
<td>Share PIT staff requirements</td>
<td>As needed</td>
</tr>
<tr>
<td>Committee</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tender Committee</td>
<td>Ensure timely approval of procurement processes and</td>
<td>High</td>
<td>High</td>
<td>Provide updates on project progress through reports and meetings to discuss project risks that need their intervention</td>
<td>Regularly</td>
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**4.2.2. Resources**

The EWSC Public Affairs Department will be responsible for the design and proper implementation and monitoring of the SEP. This department is responsible for the company-wide stakeholder management program at EWSC. The Public Affairs Manager will provide management oversight of SEP and will work closely with Project Team Members for expertise in the different functions required in the project. This is to ensure that the SEP is implemented in a successful manner.

**4.2.3. Training**

All parties involved on the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures.

**4.2.4. Budget**

The Public Affairs Department has an adequate standing budget allocated towards the Stakeholder Management Program. This is a budget that, as when is necessary, will be supplemented an increase or by other budgets related to the activities required for the SEP. Also, the Strategic Services Department will be engaged to consider the extra staff hired and include them in the EWSC payroll database. Once the project has been finalised, a detailed budget for the
implementation of this SEP will be provided and this will be included in the updated SEP.

Contacts:
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Tel: 24169000
5. GRIEVANCE REDRESS MECHANISM GRM)
The objective of the project GRM is to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow EWSC through the NWSSP project team to respond to and manage grievances filed by affected people and other parties. Grievances may emerge from directed and indirect activities related to component 1 and 2 civil work activities. Grievances may arise among affected households and communities on variety of issues ranging from compensation rates and eligibility criteria to the relocation sites and the quality of services available at those sites, where applicable. Workers’ related grievances mechanisms are addressed in Section 9 of the Labour Management Procedure (LMP) and Resettlement related grievances shall be addressed in accordance with Section 10 of the Resettlement Policy framework (RPF).

While handling grievances, the NWSSP shall establish Grievance Redress Mechanisms (GRMs) as part of the accessible and inclusive means to raise issues and grievances and allow EWSC through the NWSSP project team to respond to and manage grievances filed by affected people and other parties. The design of the GRM shall take into consideration the views of affected communities expressed during the resettlement planning process. The NWSSP Project Implementation Team shall be required to disclose and explain to affected persons and communities and, to interested other stakeholders the procedure for complaints filing as early as possible and on a regular basis throughout the project cycle. The grievance mechanism shall be available at no cost, and it is important that it be easily accessible, with special attention paid to accessibility for disadvantaged and vulnerable individuals or groups.

The Project Unit will ensure that the grievance procedure is accessible, adequately registered and tracked, and resolution is affirmed within one month of registration as outlined in the following sections.

The key objectives of the GRM are therefore to:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions);
- Forward any unresolved cases to the relevant authority.

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6 See paragraph 21 and ESS10
As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise community level, project level and Eswatini judiciary level redress mechanisms. The details of each of those components are described as follows.
5.1. Potential issues and complaint filing

Within the context of NWSSP, grievances are understood to be issues, concerns, problems or claims (perceived or actual) that an individual or a community group wants a EWSC, through the project, to address or resolve. Grievances are expected to arise:

a) directly from affected property owners or users and will be handled as follows;
   - The aggrieved person will first report his/her case to the Project Area Community Liaison Officer\(^7\) working in the Zombodze, Hosea and Shiselweni
   - The Community Liaison Officer will report the grievance to the Project Engineer/Resident Engineer\(^8\) who will address the grievance and feedback the Community Liaison Officer within five working days.

b) Grievances may be also be reported through our 24 hour Call Centre, which uses a system called MAXIMO\(^9\) that allows for the tracking of issues as they are scaled up and resolved allowing for feedback to the complainant. When the complaint is raised, it is registered and a job card to resolve the complaint is issued. Once the complaint is resolved, the job card is signed off.

Through the office of the Project Engineer, the EWSC will systematically track grievances lodged related to Project implementation and, as part of the tracking system, keep a separate record of any grievances that may arise as part of the resettlement and compensation process. It shall ensure that grievances are sorted at the point of registration is to specifically address the special concerns which relate to compensation, relocation or livelihood restoration in a timely manner.

The points of access for grievances will be shared as part of consultation with all PAPs and through broader community consultation. The Community Liaison Officers and the Social Officer will serve as the points of registration for any resettlement related complaints and his terms of reference will reflect the same and oversee the process to reach resolutions. The issue can be logged as an anonymous grievance.

When a grievance is logged by the Resident Engineer, he will then liaise with additional members\(^10\) of the Project Implementation Team to seek resolution of the issue. The Resident Engineer will acknowledge the complaint, unless the issue is logged anonymously. If the issue is registered anonymously it will be automatically referred to the head of the Project Team. Upon registration, the Resident Engineer will refer the issue for resolution or mediation to relevant officials. The aim is to resolve all grievances within four weeks. Any grievance which is not
resolved within that timeframe will be reported in detail in monthly Project Team report and quarterly reports to the World Bank. All other grievances will be aggregated to track trends for managerial response.

In principle, where the complaint is related to Swazi Nation Land, the Resident Engineer will seek to mediate the situation through the Chief. Where an issue related to deeded or land on 99-year lease, the Resident Engineer will liaise with Public Affairs Office and Compliance Office to determine proposed resolution.

5.2. **Grievance Redress Mechanism Structure**

In circumstances where disputes cannot be resolved by the Resident Engineer and the Hotlines Call Center, first instance dispute resolution arrangements, the dispute shall be directed or transferred to the Project Level GRM.

5.2.1. **Community Level Grievance Redress Mechanism**

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at local and national level. This is primarily concerned with the extended family members.

However, regarding disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the Project, the mechanism will involve the Town Officer, landowner(s) concerned, and if required, the representative from the Ministry of Natural Resources and Energy.

It is expected that any land dispute issues pertaining to the Project would be resolved at this level given the nature of land ownership and the significant authority (Land Management Board) vested under the Minister for Natural Resource and Energy. Where issues caused by the project are raised and resolved through these existing community level grievance redress mechanisms, it is important that a mechanism for reporting them to the EWSC is established. The points of access for grievances will be shared as part of consultation with all PAPs and through broader community consultation. Social Standards Officer will serve as the overall point of registration for any resettlement related complaints coming from each royal kraal Community Liaison Officer and oversee the process to reach resolutions. The issue will be logged as an anonymous grievance. The SO will view and verify contents of the log-books bi-weekly during the initial stages of the project (6 first months) and then monthly thereafter.

PAPs may complain or raise a grievance for a variety of reasons associated with resettlement impact and compensation, including but not limited to:
(a) Identification of affected land and associated assets within the Project area;
(b) Ownership/responsibility for the land and associated assets;
(c) Valuation of land or associated assets;
(d) Quality of replacement assets;
(e) Other compensation allowances;
(f) The timing or manner of compensation payments;
(g) Conduct of Project staff/representatives, or their methods in dealing with compensation.

When a grievance is logged by the Social Officer, The Social Officer will acknowledge the complaint, unless the issue is logged anonymously. If the issue is registered anonymously it will be automatically referred to the head of the Project Unit. Upon registration, the Social Officer will refer the issue for resolution or mediation to relevant officials.

5.2.2. Project Level Grievance Redress Mechanism (GRM)

A project level GRM is a harmonised system for all project related disputes and resolutions. Its objective is to bring GRM closer to all stakeholders at various levels. Issues that are not resolved at first instance dispute/grievances shall be escalated to the next level. All effort shall be made to resolve issues at the first instance.

At community level the project will establish a GRM committee and shall have the following members:

- The Supervising Consultant, Chair
- The Resident Engineer, Member
- The Contractor, Member
- Community Liaison Officer
- PAPs’ representative

The project level GRM committee shall resolve or reach a decision five (5) days from the date the complaint is received. The chairperson of the GRM committee shall communicate the committee's decision to the aggrieved PAPs in writing and keep record of all decisions related to each case as illustrated in the diagram below.
5.2.3. **Regional Level Grievance Redress Mechanism (GRM)**

The objective of the Regional level GRM is to resolve complaints that the project level GRM is unable to handle. The Regional level GRM shall comprise of the following members:

- Regional Secretary, Chair person
- Municipality CEO
- Ministry of Housing Regional Representative
- EWSC Regional Manager
- Social officer
- Public Affairs Manager

Regional level GRM shall do everything possible to resolve issues within fifteen (15) days from the date the case has been transferred to it from the project level GRM. The chairperson of the GRM committee shall communicate the committee’s decision to the aggrieved (PAPs) in writing and keep record of all decisions related to each case.

5.2.4. **EWSC Level Grievance Redress Mechanism**

A committee of knowledgeable persons, experience in the subject area, shall be constituted at the ESWC to handle complaints that have not been addressed or resolved at the regional level in the impact area or the project area corridor. The EWSC level GRM shall be comprised of the following members:

- EWSC Technical Director, Chair person
The EWSC level Grievance redress Mechanism committee shall do everything possible to resolve issues within fifteen (15) days from the date the case has been transferred to it from the county level GRM committee. The chairperson of the committee shall communicate the committee's decision to the aggrieved PAP(s) in writing. The decision reached at the EWSC committee level will be the final decision. The committee shall keep record of all decisions related to each case. When disputes are not resolved at one of the above level, the case will be directed to the Minister for Natural Resources to forward to the Minister for Housing as per the Land acquisition Act.

5.2.5. Grievance Procedures

The following procedures shall be followed while filing and processing complaints through the above described GRM structures:

- **Grievance Register Book**: Grievance register books shall be opened and kept in the office of resident engineer, Community Liaison officer and at the Inkhundla. All grievances shall be registered when and upon the receipt of complaints from the aggrieved. The book shall have: i) case reference number, ii) the aggrieved name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column.

- **Responsibility for Registering Complains**: the Resident Engineer, CLO, and Indvuna yeNkhundla in the project area shall register in the Grievance Register Book all complaints received.

- **Case Receipt**: Within 24 hours of receiving complaints, the monitoring consultant shall issue a letter to the aggrieved acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue.

- **Public Access to the book**: The book shall be accessible to the public,

- **Gender Based Violence grievances will not be documented in the public accessible book. However, a GBV action Plan will be prepared to manage related risks, and a specialized NGO will be engaged for awareness and will develop a system that will capture GBV/SEA and HIV/AIDS related issues.**

- **PAPs**: All PAPs who have issues with their compensation and assistances are required to submit written complaints to the appropriate level of GRMs.
• Mediation meetings and outcomes will be recorded and kept in safe places at each of the Grievance Redress Mechanism Committee’s locations.

5.2.6. World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by the NWSSP can submit complaints to existing country-level grievance redress mechanisms - designed specifically for NWSSP. If existing county level GRM(s) described in this RPF failed to resolve disputes in amicable fashion, PAPs can file their complaints to the World Bank’s Grievance Redress Service - known as the World Bank’s independent Inspection Panel11 which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and World Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service, please visit; http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

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11 The Inspection Panel is an independent complaints mechanism for people and communities and people who believe they have been, or are likely to, adversely affected by a World Bank-funded Project. The World Bank’s Board of Executive Directors created the Inspection Panel in 1993 to ensure access to an independent body to express concerns and seek recourse. The Panel assesses allegations of harm to people or the environment and reviews with the World Bank followed its operation policies and procedures. Claims can be raised by any group or two or more people in the country of the World Bank finances project. Additional details of procedures on www.inspectionpanel.org.
6. MONITORING AND EVALUATION

Monitoring and evaluation of the stakeholder process is considered vital to ensure EWSC is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in EWSC shown by all stakeholders;
- Clearly defined approaches; and
- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken.

Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. A series of key performance indicators for each stakeholder engagement stage have been developed. Table 8 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 8: Key Performance Indicators by Project phase

<table>
<thead>
<tr>
<th>Project Phase</th>
<th>Key activities</th>
<th>Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning for construction</td>
<td>Preliminary Stakeholder engagement on project designs and anticipated impacts.</td>
<td>Stakeholder engagement reports &amp; records of meetings</td>
</tr>
<tr>
<td></td>
<td>Notification on multi-media (posters, radio, TV, EWSC website)</td>
<td>Number of notifications &amp; mode of communication</td>
</tr>
</tbody>
</table>
The identification of NRAP-related impacts and concerns is a key element of stakeholder engagement that will occur over the complete NRAP life-cycle. As such, the identification of new concerns and impacts as the ESIA and NRAP progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

In the ESIA Reports there will be a review of the engagement activities conducted; levels of stakeholder involvement (particularly for affected communities, women and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESIA Report, particularly with respect to mitigation and monitoring strategies contained in the Environmental and Social Action Plan.
6.1. **Review of Engagement Activities in the Field**

During engagement with stakeholders the engagement team will assess meetings using a feedback evaluation form or asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly.

The engagement team will conduct debriefing sessions while in the field. This assesses whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.

The use of engagement tools developed through the ESIA engagement including:
- Stakeholder database;
- Issues Log or Issues and Response table; and
- Meeting records of all consultations held.

Moreover the tool can be used to manage on-going Project issues, and for stakeholder identification and analysis processes.

6.2. **Reporting Stakeholder Engagement Activities**

Performance will be reviewed following the engagement sessions conducted in the field. In addition, there will be opportunity for the ESIA engagement team to review and assess performance in between the engagement sessions depending on the level of feedback received from stakeholders during these periods.

Evaluation of performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance, the following will be considered:
- Materials disseminated: types, frequency, and location;
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. women, youth, community leaders);
- Number of people attending public or formal meetings
- Number of comments received on specific issues, type of stakeholder and details of feedback provided;
- Numbers and type of stakeholders who meet the Project team by mail, telephone and any other means of communication;
- Meeting minutes, attendance registers and photographic evidence;
- Comments received by government authorities, community leaders and other parties and passed to the Project;
• Numbers and types of feedback and/or grievances and the nature and timing of their resolution; and the extent to which feedback and comments have been addressed and have led to corrective actions being implemented.

The SSO plays a critical role as internal change agent for social and stakeholder-related matters in EWSC. This becomes important if social and stakeholder risks identified need to be escalated for higher-level decision-making to identify a resolution. The SSO needs to remain actively involved with the community development and land acquisition/resettlement planning and implementation in order to identify potential risks or opportunities and ensure that the needed administrative support is provided. Moreover, grievances submitted as part the community development and land acquisition/resettlement processes need to be addressed under the GRM scheme.
Annex 1

INITIAL STAKEHOLDER ENGAGEMENT MEETINGS REPORT

OVERVIEW OF THE PUBLIC CONSULTATION PROCESS

This section describes the outcomes of the stakeholder consultation process as part of the ESIA compilation; furthermore it provides details of the public consultation and participation activities undertaken during compilation of the ESIA for the Nhlangano - Siphambanweni Integrated Water Supply Project. The law states that public participation and provision of access to information are obligatory procedures of the environmental authorisation process and for that reason, these consultations were aimed at being fully-inclusive, open and transparent. Stakeholder engagement and participation is of essence in the planning and implementation of the proposed water project as it will provide an opportunity for the implementing agency (EWSC) and other stakeholders to engage extensively with project beneficiaries, identify stakeholder’s interests and to collate feedback to assist in project planning and in the refinement of preliminary designs.

The consultation process was carried out in accordance with the requirements of the Eswatini Environment Authority (EEA) and the Environmental and Social Standards (ESSs) of the World Bank (ESS10 – Stakeholder Engagement and Information Disclosure in conjunction with ESS1 – Assessment and Management of Environmental and Social Risks and Impacts). Public consultation, disclosure and stakeholder engagement are key requirements of the World Bank because when done effectively, they can improve the environmental and social sustainability of projects and as well as allow these stakeholders to make significant contribution to successful project design and implementation. It assists also in the management of environmental and social impacts. The requirements for stakeholder engagement in projects require that stakeholder consultation and engagement should start as early as possible in the project cycle; continue throughout the life of the project; be free of external manipulation, interference, coercion, or intimidation; where applicable enable meaningful community participation; and be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.

A number of various stakeholders are involved in this project; ranging from the Government Line Ministries, the community and other stakeholders. Noteworthy is that these consultations were carried out at both Regional and Constituency Level. At the Regional level, the following groups of people were inclusive; constituency leadership (Bucopho, Tindvuna), development partners (World Vision, Red Cross), security forces (Police, Correctional, USDF), the youth (ENYC) and
Government (CTA, Education, Commerce, Rural Water, Health). For the Constituency Level, these groups of people were consulted; the youth, water committees, WASH community representatives, social workers (Bagcugcuteli), traditional authorities and community police. The public consultation process began in March 14, 2019.

The primary aims of the public participation process are:

- To inform Interested and Affected Parties (I&APs) and key stakeholders of the proposed application and environmental studies;
- To initiate meaningful and timeous participation of I&APs;
- To identify issues and concerns of key stakeholders and I&APs with regards to the application for the development (i.e. focus on important issues);
- To promote transparency and an understanding of the project and its potential environmental (social and biophysical) impacts (both positive and negative);
- To provide information used for decision-making;
- To provide a structure for liaison and communication with I&APs and key stakeholders;
- To ensure inclusivity (the needs, interests and values of I&APs must be considered in the decision-making process);
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance;
- To anticipate and avoid risks and impacts and where possible, minimize or reduce risks to acceptable levels;
- To focus on issues relevant to the project, and issues considered important by I&APs and key stakeholders; and
- To provide responses to I&AP queries.

The public participation process for the proposed project was undertaken according to the stages outlined below.

**Scoping phase stakeholder engagements**

1. **Initial Stakeholder Consultations**

At the inception of the ESIA process, the Development Teams from each benefiting community were engaged. Meetings were also held with the Ministry of health, which is driving the sanitation part of the project. Consultations were conducted at Regional level (Shiselweni Region Development Team) and further condensed to Constituency level (Zombodze Emuva Inkhundla Development Team, Hosea Inkhundla Development Team and Shiselweni 1 Development Team).

All I&AP information; including details on who was consulted, consultation dates, what was consulted on and general feedback on consultation process, responses, has been included and
acts as a record of the communication/public involvement process. This has been attached as Appendix of this report.

A total of five consultative meetings were held on the following dates, the last meeting was the scoping meeting:

<table>
<thead>
<tr>
<th>Meeting</th>
<th>Date</th>
</tr>
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<tbody>
<tr>
<td>Shiselweni Regional Development Team</td>
<td>14 March 2019</td>
</tr>
<tr>
<td>Zombodze Emuva Constituency</td>
<td>16 March 2019</td>
</tr>
<tr>
<td>Hosea Constituency</td>
<td>23 March 2019</td>
</tr>
<tr>
<td>Shiselweni 1 Constituency</td>
<td>30 March 2019</td>
</tr>
<tr>
<td>Hluthi Sub-regional Offices (Scoping Meeting)</td>
<td>04 April 2019</td>
</tr>
</tbody>
</table>

During these consultations, a powerpoint presentation was presented by the EWSC's Project Manager; Mr Bongani Mdluli and the Corporation's Public Affairs Manager Ms Nomahlubi Matiwane explained the aim of the meeting which was to;

- Provide background information about the proposed water project (project brief)
- Gather feedback and identify stakeholders interests
- Address social, technical and environmental issues

The people were then allowed to voice their comments and seek clarifications. The following photoplates show the pictures of the different consultations that have been carried out so far.

**Photoplate 1:** A section of Attendees for the Shiselweni Regional Team meeting
Photoplate 2: the project Manager presenting the project outline

Photoplate 3: Interactions with the Shiselweni Regional Team
Photoplate 4: Zombodze Emuva Consultations

Photoplate 5: Interactions with Zombodze Emuva Attendees
Photoplate 6: Hosea Inkundla Consultation Attendees

Photoplate 7: submission of the Environmentalist at Hosea Inkundla
Photoplate 8: A section of Attendees for Hosea Inkhundla

Photoplate 9: Some of the Attendees of the Consultative Meeting for Shiselweni 1

Photoplate 10: A Presentation by Ms Matiwane during the Meeting
Focus Group Meeting - Women Only

One focus group meeting has been held thus far, with women. In this meeting, the women were asked for their perceptions and expectations with respect to the proposed project and in particular the location of kiosks along the project area for ease of accessibility. They were also asked to indicate the main challenges they face as a result of the unavailability of potable water in the area. Issues of sanitation were also discussed as perpetuated by the lack of clean water. The following photo plates illustrate the discussion.
Advertising for the Scoping meeting

Site Notices

Site notices were erected at various noticeable locations along the MR11 corridor (Nhlangano - Siphambanweni). A3 size site notices in both English and Siswati were placed at the boundaries of the site and surrounding population concentrated areas (Hluthi Police Station, Siphambanweni Water Kiosk, Market Stalls and multiple Bus Stop Shelters along the aforementioned road amongst others), inviting interested and affected members of the public to a scoping meeting as part of the ESIA compilation process.

The photo plates show some of the notices displayed;

*Photoplate 13: Ms Matiwane Chairing the Discussion*

*Photoplate 14: Advert displayed at the entrance of a local shop*
Advertising

To support the project environmental review process, members of the public and I&APs were invited to a scoping meeting with the purpose of collecting public input and allowing the public and I&APs to express their views and concerns about the project. The primary aim of the advert was to ensure that the widest possible group of I&APs were informed of the project, and to elicit comments from the public regarding the proposed project. This interactive process is key in the determination of major issues and impacts that will be vital and need to be addressed in the ESIA. This advert was published in the local newspaper for two consecutive weeks on the following dates; 23rd March 2019, 30th March 2019, 31st March 2019 and 3 April 2019. To reach a wider audience, members of the public and I&APs were also invited to the meeting on various social media platforms including Facebook, through the EWSC’s pages.

The following photo plate shows one of the published adverts on the local Newspaper;
ENVIRONMENT AND SOCIAL SCOPING MEETING
PROPOSED DEVELOPMENT OF A POTABLE WATER SUPPLY NETWORK
FROM NILANGANO TO SIPHAMBANWENI

Executive Water Services Corporation (EWSC) is proposing to establish a potable water supply network from Nilangano to Siphambanweni as part of the Inanda – Matsheji – Nilangano Water Supply Augmentation Project. The project aims to provide potable water for domestic, institutional and commercial consumption to populations along the MR11 corridor as well as improving sanitation coverage. The proposed project is aimed at improving sanitation and enhance access to potable water through the management of freshwater resources and sanitation facilities. This subsequently accommodates the sixth Sustainable Development Goal (SDG 6: Clean Water and Sanitation) which focuses on ensuring access to potable water and sanitation for all. The anticipated beneficiary population is estimated to exceed 30,000 people. The project entails excavation and installation of a 64 km pipe mains and associated pump stations at various sites, connected to 246 km of existing water supplies for households, offices, clinics, schools and kiosks.

In accordance with the Environmental Audit, Assessment and Review Regulations, 2000, members of the public and interested and affected parties (IAPs) are invited to a scoping meeting. The purpose of the meeting is to allow members of the public and IAPs to express their views and concerns about the project.

The scoping meeting will be held on Thursday, 06 April 2019 at 1500 hours at 10th Sub-Region Office, Klipfontein Business Centre.

For further details, the following can be contacted:

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Mbabane
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Email: masimanej@ewsc.co.sz

Photoplate 16: Advert in the local newspaper
Public Scoping Meeting

The primary aim of the public meeting was to:

- Provide I&APs and stakeholders with information regarding the proposed project and associated infrastructure;
- Provide I&APs and stakeholders with information regarding the ESIA process;
- Provide an opportunity for I&APs and stakeholders to seek clarity on the project;
- Record issues and concerns raised; and
- Provide a forum for interaction with the project team.

The scoping phase for the consultations were process was concluded in 04 April 2019. A scoping report has been compiled and submitted as Appendix of this report.

Further consultations

Further Consultations will be carried out as outlined in the environmental and social commitment plan (ESCP) developed for this project.