ITUKA WEST NILE UGANDA LIMITED

20 MW SOLAR PV PLANT IN ULEPPI SUB-COUNTY MADI-OKOLLO DISTRICT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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1. INTRODUCTION

Uganda is currently grappling with a potential for a critical energy crisis, primarily stemming from an inadequate electricity distribution and over reliance on hydro power, with far-reaching implications for the nation's economic stability and social cohesion. This energy imbalance alongside upgrades needed to the grid infrastructure, has resulted in frequent power interruptions, unfavorably affecting businesses, healthcare institutions, and educational establishments, primarily in the West Nile Region. With just 22.1% of the country's population having access to grid-connected power, achieving Uganda's development objectives faces a substantial hurdle. Nevertheless, the Ugandan government has implemented a series of strategic initiatives to combat this energy crisis, with a particular focus on promoting investments in renewable energy sources, notably solar energy.

The Ugandan government has legislated a number of laws and policies to encourage investments in renewable energy, particularly solar energy. The Renewable Energy Policy of 2007, for example, intends to enhance access to clean and reliable energy services, promote renewable energy investments, and assist the development of renewable energy technology in Uganda. The policy includes incentives and tax reductions to encourage renewable energy investment, as well as aims for renewable energy production and consumption. In addition to the policy, the Government of Uganda (GoU) has also enacted the Electricity Act of 1999, which provides for the regulation of the electricity sector in Uganda, including renewable energy sources. The Act mandates that the Electricity Regulatory Authority (ERA) support the development of renewable energy sources and adopt a feed-in tariff to attract renewable energy investments.

Furthermore, the government has developed the Scaling-Up Renewable Energy Program (SREP) under the Climate Investment Funds, which aims to promote investments in renewable energy projects, including solar energy, in Uganda. The program provides financial support and technical assistance to renewable energy projects, including solar farms, to enable their development and implementation. Overall, these laws and policies demonstrate the Ugandan government's commitment to promoting investments in renewable energy, including solar energy, and provide a conducive environment for stakeholders to invest in the sector.

In accordance with the above, Ituka West Nile Uganda Limited (INUL) (hereafter referred to as 'the Developer' and which is a company fully owned by AMEA Power) was awarded to develop a 20-Megawatt (MW) Solar Photovoltaic (PV) Plant in the Madi-Okollo District (hereinafter referred to as 'the Project').

This document is a Stakeholder Engagement Plan (SEP) which will be applied by the Developer throughout the Project's construction and operation phases. The SEP outlines a systematic method to stakeholder engagement that will assist the Developer in developing and maintaining a positive relationship with their stakeholders, particularly the locally affected communities, over time. The SEP is a dynamic document which will be modified through Project construction, operation and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for the Developer at the end of this document.

In particular, this SEP includes the following:

- Chapter 2 – Project Description: providing a summary of the project's location, main project components, project schedule and phases, and the job opportunities and benefits of the Project;
- Chapter 3 – Regulatory Context: this chapter highlights the main requirements that are relevant for the stakeholder engagement to the project, in order to include Ugandan national requirements and international performance standards and best practice requirements;
- Chapter 4 – Identification of Stakeholders: identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;
- Chapter 5 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project;

- Chapter 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe and responsibilities.
- Chapter 7 – Contact Details: provides contact details of the Developer for communication with all relevant stakeholders of the Project;
- Chapter 8 – Stakeholder Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project during the construction and operation phase, particularly from affected stakeholder and communities.

1.1 SCOPE AND MEANING

This Stakeholder Engagement Plan (SEP) has been prepared to manage and facilitate public consultation and engagements through the various stages of the Project's life cycle from pre-construction to construction, and post construction phases. It adopts an inclusive approach that takes care of the specific needs and expectations of stakeholders at regional, national, and local level. Since the project was conceived with the view of improving access to refugee settlements and host communities, the needs and priorities of the existing refugee groups, both registered and unregistered (self-settled) must be integrated in an all-inclusive and elaborate stakeholder engagement plan. It also accounts for the needs of the different tribes that exist in the host communities. The SEP also details engagements undertaken as part of ESIA and RAP preparations and serves as a guide for engagement during implementation, construction, post construction/operation activities. This SEP is a living document and will have to be revised regularly to inform ongoing stakeholder engagement through the various stages of project development, in line with legal and policy frameworks.

Stakeholder engagement is an interactive process that aims to build and maintain an open and constructive relationship with stakeholders and thereby facilitate and enhance project management of its activities and operations, including its environmental and social effects and risks. It is a more inclusive and continuous process between a project (and or developer) and those potentially affected by or have an interest in the project.

In the context of this SEP, a stakeholder refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties). They may include local communities, national and local authorities, neighboring projects, and non-governmental organizations.

1.2 PURPOSE AND OBJECTIVES

This SEP is an instrument for mapping and prioritizing stakeholders across levels and regions; for guiding or managing the planned information disclosure or communication and consultation processes with identified stakeholders as they exist at through the different project phases. This SEP as a tool also allows for stakeholder consultation as two-way process including managing the feedback process.

The objectives of this SEP include the following:

- To design stakeholder engagement framework and requirements of the project ii. Describe the legal requirements for consultation and disclosure;
- Provide an inventory of key stakeholder who are likely to be affected by the project directly or indirectly.
- Provide summary of all public consultation and information disclosure activities to date
- Propose an effective approach and strategy for meaningful and standardised disclosure of relevant project information

- Propose an appropriate stakeholder feedback mechanism and a process for receipt and resolution of project grievances;
- Draft a public consultation and disclosure program and schedules against the different stages of the project;
- Indicate related budgets and management staffing requirements.

2. PROJECT DESCRIPTION

2.1 Project Location

Administratively, Uganda is divided into four (4) regions, followed by a total of 15 sub-regions, which split into 135 districts, and then into counties, sub-counties, parishes and villages. The Ituka West Nile 20 MWAC Solar PV Project is located in the Northern region of Uganda. More specifically, the project site is situated in the villages of Ombachi and Muni of the Laura Parish, in the Uleppi sub-county of the Madi Okollo District in the West Nile sub-region of Uganda.

The Project is situated along the Nebbi - Arua Highway at Ombachi and Muni Villages in Laura Parish, Uleppi sub-County, Madi Okollo district in North-western Uganda. The area is approximately 1.4 km south of Uleppi town, and 500 meters off the Nebbi - Arua Highway.

The Project is expected to be constructed on roughly 52 acres of land acquired and leased as leasehold from local resident owners on a willing lessor-willing lessee basis. The Project will evacuate the clean power produced into the Arua - Nebbi 132 kV transmission line running parallel to the project site by means of a Loop-in, Loop-out interconnection methodology through a dedicated substation.

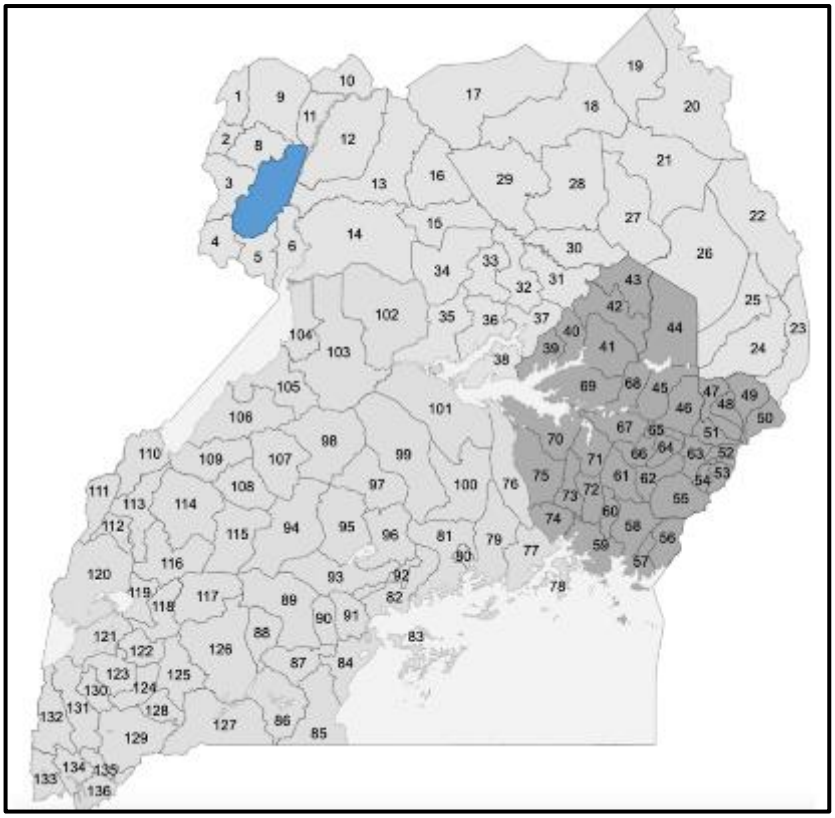


Figure 1: Project Location in Madi Okollo District of Uganda

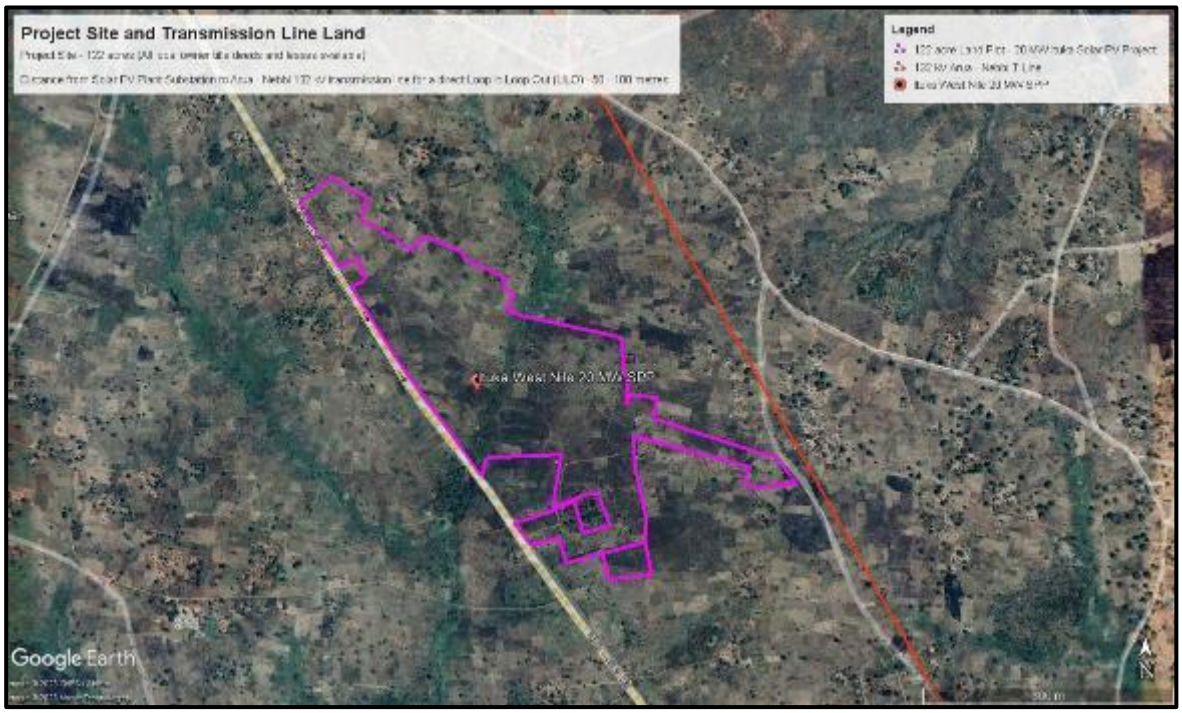


Figure 2: Project Site

2.2 Project Components

The Project facility will be constructed using solar photovoltaic (solar PV) technology.

The key components of the Project are the power arrays which are composed of PV panels which convert solar energy (radiation from the sun) into electricity. Typical PV power array that is composed of PV panels is shown in Figure 3 below.

Figure 3: Typical PV Power Arrays Composed of PV Panels

Other infrastructure elements needed onsite include:

- Inverters: They are necessary to convert direct current (DC) to alternating current (AC) for utility grid connection. The inverters are connected to many modules in both series and parallel strings.

- Substation which converts voltage that is appropriate for connection with the National Grid;
- Fencing around the entire facility and security will be required to ensure safety from criminal activity and trespassing of unauthorized personnel; and
- Building Infrastructure will mostly include offices for normal daily operational related work, as well as a warehouse for storage of equipment and machinery;
- Road network to include an access road network for ease of access to the arrays for operation and maintenance purposes;
- All consumables needed for the works and the operation of the site facilities (water source and supply, sanitary facilities) as well as their connection works.
- The Grid Connection Interface: This is where the electricity is exported into the grid network. The Project will evacuate the clean power produced into the Arua – Nebbi 132 KV transmission line (currently under construction by Uganda Electricity Transmission Company Limited), which runs parallel to the Project Site.

The benefits of the Project will culminate in critical beneficial environmental and economic implications on the strategic and national level considering the present challenges the energy sector in Uganda is facing. Such beneficial impacts reinforce the premise and rationale of the Project. These include the following:

- Government commitment to achieving the established targets for renewable energy sources;
- Contribute to increasing energy security through reliance on an inexhaustible and independent energy resources. The Project will serve the pool that supplies the whole region.
- PV power generation is pollution free during operation, and it helps cut down on both greenhouse gas and air pollutant emissions.

2.3 Project Phases

- Planning and Construction Phase (**Q1 2024 – Q1 2025**): this phase includes the development of a detailed design for the Project, the planning and transportation of various Project components to the site (e.g., PV modules), and onsite preparation activities for the installation of the PV arrays and other components. Activities associated with site preparation may include excavations, grading, and land clearance.
- Operations Phase (**Q1 2025 – Q1 2045**): this phase entails the operation and maintenance of the PV Power Arrays and all electrical equipment. This involves, for example, cleaning PV modules on a regular basis to minimize dust build-up, which could hinder performance. The operation phase also comprises commissioning tests, which include standard electrical screening for both the electrical infrastructure and the panels, as well as an assessment of routine civil engineering quality records.
- Decommissioning Phase: the lifetime of the PV plant is 20 years, after which it is decommissioned and the panels are uninstalled. Decommissioning activities may include disconnecting the various Project components (PV arrays, central inverter stations, and so on) for final disposal.

2.4 Job Opportunities

Summarized below are the job opportunities that will be provided during the construction phase as well as the job opportunities anticipated for the operation phase of the Project.

- There will be a peak of about 200 jobs available for temporary workers during the construction phase. This will include skilled workers such as technicians, engineers, and mechanics, as well as the unskilled workers such as security guards, laborers, etc. The Developer will prioritize local communities for such employment opportunities to the extent possible; and
- Approximately 20 employment opportunities during the 25-year operation phase, including both skilled workers (such as a plant manager, production manager, control engineer, plant administrator, accountant,

etc.) and unskilled labour (such as module cleaners and security personnel). The Developer will prioritize local communities for such employment opportunities to the extent possible.

3. REGULATORY CONTEXT

3.1 Relevant Ugandan Stakeholder Engagement Requirements & Ugandan Legislation

Uganda has made significant progress in fostering the use of renewable energy in the country. The government has implemented a variety of laws and regulations to promote the development and operation of renewable energy projects. The government's approach to renewable energy has created a favourable climate for both entrepreneurs and investors, and the incentives granted have attracted substantial investment to the sector. Below are the policies and regulations that apply to the project;

- ***The Electricity (Renewable Energy) Regulations of 2007*** determines the guidelines for establishment and operation of renewable energy projects in Uganda. Before construction can begin, the regulations require renewable energy projects to undertake an environmental impact assessment and receive the relevant permissions and licenses. Although, the regulation does not explicitly mandate stakeholder engagement and consultations as a part of an Environmental Impact Assessment (EIA) or Environmental and Social Impact Assessment (ESIA), the regulation primarily focuses on the licensing, development, and operation of renewable energy projects rather than explicitly addressing stakeholder engagement. These regulations provide guidelines for obtaining licenses and determining the technical requirements for renewable energy projects. However, it is important to note that stakeholder engagement and consultations are considered best practices in the renewable energy sector. This regulation acknowledges solar energy as one of the renewable energy sources that may be utilized in Uganda to generate electricity. Additionally, the regulations establish the technical conditions that must be met for the installation and operation of solar power plants and license solar power generation projects. However, the engagement of stakeholders is a crucial element of Uganda's legal framework for renewable energy projects. The Electricity (Renewable Energy) Regulations of 2007 and the National Environment Act of 2019 both press that renewable energy project developers consult with stakeholders during the project development and implementation phases. ***The Electricity (Renewable Energy) Rules of 2007*** stipulates that developers of renewable energy projects must undergo public consultations prior to beginning construction. Consultations must take place in the project area and involve all relevant stakeholders, including community members, local authorities, and environmental agencies. The developer of the project is obliged to provide information on the project's potential affects and to gather opinions and suggestions from affected parties on how to reduce these effects.

- The ***Renewable Energy Policy of 2007*** emphasizes the necessity for stakeholder participation in renewable energy projects, especially in rural areas. The policy acknowledges that renewable energy projects have the potential to improve the lives of rural populations and encourages project developers to connect with these communities and incorporate them into project development and implementation.

- The ***Environmental Impact Assessment Regulations, 1998***; Sub Regulation (1) of Regulation 12 that requires the developer to take all necessary measures to seek the views of the people in the communities that may be affected by the project. Regulations 19, 20, 21, 22 and 23 outline further requirements for public participation.

- The ***1995 National Constitution***, under article 237(1) (a), gives government powers to acquire land in the public interest subject to the provisions of article 26, which gives every person in Uganda a right to own property; and also be consulted and participate in the respective development planning process.

- The ***Local Government Act (1997)*** provides for the system of local governments, which is based on local councils and the participation of the community members. This is in addition to other national policies such NDP II (2015-2020) and National Gender Policy (NGP, 2007).

- The ***National Gender Policy 2007; and National Plan of Action for Women*** are aimed at narrowing the gender (inequality) gap and promoting equity in access to and control of resources or development outcomes by ensuring that gender concerns are routinely identified and addressed in the identification, design, appraisal, implementation, monitoring and evaluation of national, and local government policies, plans and programs.

- The ***UNRA Environment and Social Management System (2019) and the UNRA Land Acquisition and Resettlement Policy (2019) section 4.0*** highlight the significance of stakeholder engagement as source of information as well as project social and environment risk management strategy and tool throughout the project cycle and includes Guidelines for Stakeholder Consultation and Information Disclosure during ESIA and RAP processes. This is re-echoed in annex 1 section 6 and 5 of the UNRA Business Processes for the Department of Environment and Social Safeguards.

- The ***Land Act, 1998*** addresses land holding, management control and dispute resolution and repeats (in Section 3) provisions of Article 237 of the Constitution which vests all land ownership in the citizens of Uganda, to be held under customary, freehold, mailo or leasehold tenure systems. Section 43 of the Act reaffirms the statutory power of compulsory acquisition conferred on the government and local authorities under articles 26 (2) and 237(2) (a) of the Constitution but subject to fair and prompt compensation and where necessary recourse to redress mechanism. This is re-echoed in Land Acquisition Act, 1965.

- Uganda's environment is preserved and conserved by the ***National Environment Act of 2019***. The act specifically acknowledges the potential for solar energy to add to Uganda's energy mix. Moreover, it mandates that renewable energy projects adhere to environmental norms and guidelines, including the production of environmental impact assessments and the implementation of mitigation measures to reduce the project's environmental impact. Therefore, the ***National Environment Act of 2019*** requires stakeholder engagement and consultations as part of the Environmental Impact Assessment (EIA) or Environmental and Social Impact Assessment (ESIA) processes. The Act mandates public consultations to educate stakeholders of a project's possible impacts and gather their feedback and suggestions for mitigating countermeasures.

Therefore, Stakeholder participation is an integral component of Uganda's regulatory framework for renewable energy projects. The ***Electricity (Renewable Energy) Regulations of 2007***, the ***National Environment Act of 2019***, and the ***Renewable Energy Policy of 2007*** all require renewable energy project developers to engage with stakeholders during the development and implementation phases of their projects. The aim of the engagement is to foster sustainable and responsible development by ensuring that all relevant parties' concerns and interests are taken into account during the project's planning and execution phases.

3.2 IFC Requirements

The developer will be seeking financing for the Project from International Financial Institutions (IFIs). The Developer seeks to develop and oversee the project in compliance with good international industry practice and standards. As such, the SEP have been drafted in consideration of the IFC Performance Standards (PS). The IFC requirements have de facto established the international standard for environmental and social performance in project financing. The IFC Performance Standards are an element of its Sustainability Framework, and "IFC Performance Standard 1" (IFC, 2012) includes the following guidelines for stakeholder engagement:

- A Stakeholder Engagement Plan (SEP) will be prepared and put into action, with consideration given to the project's risks, impacts, and development stage, as well as the distinctive qualities and interests of the Affected Communities.
- Stakeholder Engagement is an on-going process that may engage: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.
- The Affected Communities will have access to information about the project's purpose, scope, and timeline; (i) the time frame for proposed project activities; (ii) potential risks to and potential effects on communities, as well as necessary mitigating measures; (iii) the planned stakeholder engagement process; and (iv) the grievance mechanism.
- When affected Communities are susceptible to identified risks and adverse impacts from a project, a consultation process will be carried out in a manner that allows Affected Communities to express their views

on project risks, impacts, and mitigation measures, and enables the client to consider and respond to those points of view.

- The scope and depth of engagement should be in line with the project's risks, adverse impacts, and concerns expressed by Affected Communities.
- The consultation approach and process will be adjusted to the linguistic preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.
- For projects with the potential for substantial adverse implications, the client will engage in an Informed Consultation and Participation (ICP).
- A grievance mechanism will be developed to collect and facilitate resolution of Affected Communities' environmental and social performance concerns and grievances.

4. IDENTIFICATION OF STAKEHOLDERS

Referring to IFC definition of stakeholders, (external) stakeholders are defined as

> "*Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.*"

In order to define a communication process with stakeholders, several stakeholder groups that may be interested and/or affected by the Project development and implementation have been identified and analyzed. There are a number of groups of people and social groups who are interested in the Project on different levels. In accordance with the IFC definition, stakeholders are categorized into three groups:

- *Directly impacted:* In this context, "directly impacted stakeholders" refers to those who would have the greatest immediate impact from the Project and/or who have been identified as being most susceptible to changes as a result of the Project. Direct stakeholders include mainly local community members – this includes village leaders, community and religious leaders, residents in the project's affected villages, as well as vulnerable persons, such as women, youth, the elderly. This also includes Project Affected Persons (PAPs) that could be subject to some economic displacement impacts.
- *Indirectly Impacted:* Anyone who may be indirectly affected by the Project are referred to as "indirectly impacted stakeholders." Governmental entities (national, regional and local), Non-Governmental Organizations (NGOs) and Community Based Organizations (CBOs) are examples of indirect stakeholders.
- *Other Relevant Stakeholders* include government agencies, other enterprises working in the area, the media, and academic institutions, among others, who have an interest in or the ability to affect Project operations.

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified in the course of the Project development and as a result of cooperation of the parties.

Vulnerable Groups

The list of stakeholders aims to include vulnerable groups and which are groups expected to be disproportionally affected by the project impacts. Vulnerable groups are project specific and depend on a range of issues which must be understood such as project location, socio-economic and demographic context, as well as the nature of the development and type of impacts anticipated. Factors including the project's geographical, socioeconomic, and demographic backdrop, the nature of the development, and the predicted repercussions all play a role in determining which communities are most at risk.

Within the project context, the following are identified as vulnerable groups:

- **Women**: they are considered a vulnerable group due to a combination of social, economic and cultural factors. In terms of social and economic factors, women in Uganda are often marginalized and disadvantaged compared to men. Women in Uganda are more likely to live in poverty and experience discrimination in education, employment, and access to basic services such as healthcare and clean water. Women are also more likely to be affected by domestic violence, and sexual assault. Culturally, women in Uganda are often expected to conform to traditional gender roles and expectations, such as caring for children and the household. Additionally, within such local communities may face obstacles to advancement in the workplace and in decision-making due to cultural norms prevalent in rural areas.
- **Elderly**: are considered a vulnerable group in Uganda for several reasons. Many elderly people in Uganda are living in poverty and have limited access to basic services such as healthcare, education, and social protection. They may also face discrimination and social exclusion, particularly in rural areas where traditional customs and beliefs about aging may lead to neglect and mistreatment.
- **Disabled**: many people with disabilities in Uganda face significant barriers to accessing basic services such as healthcare, education, and employment. They may also face discrimination and social exclusion, which can further exacerbate their vulnerability.

Due to the nature and location of the Project, no other vulnerable groups are anticipated to be disproportionately affected by the Project's impacts and hence require particular attention throughout the consultation process.

Table 1: Identified Groups of Stakeholders

Level of Stakeholder interest in/involvement to the Project
1. Stakeholders who may be directly or indirectly affected by the Project
Residents of the nearby villages of the Project to include the following: - Ombachi Village – the project site falls within the Ombachi village. Ombachi village is located in the Laura Parish, in the Uleppi sub-county of the Madi Okollo District in the West Nile sub-region of Uganda. - Muni Village - is also located in the Laura Parish, in the Uleppi sub-county of the Madi Okollo District in the West Nile sub-region of Uganda. For the above, this includes the following groups within the local communities in specific: - Community People: the locals have a direct interest in the initiative, mostly due to the possibility of employment and procurement prospects. Also, local could be affected by additional potential negative impacts. Nonetheless, due to the location of the Project site, such impacts are minor and may include issues such as worker influx in the village if workers are housed nearby. - Community Leaders: They are socially active members and prominent community figures, who may or may not have positions in government. The project's community leaders represent the areas that will be directly impacted by it. - Business Community (local subcontractors): These organizations have a vested interest in the project because of the possibility for procurement opportunities such as subcontracting works (e.g., civil works, provision of food and amenities, etc.)
Women groups - Women are often left excluded from the stakeholder engagement process in traditional settings. Hence, it's essential to establish arrangements for women, which could imply holding separate stakeholder sessions for women and making sure women aren't intimidated or challenged for exercising their right to participate in stakeholder consultation sessions and potential female engagement program events. Women of Ombachi and Muni Villages may have a vested interest in the project because of the employment opportunities it could provide, and potential adverse effects that the project could cause in their villages. Therefore, classifying such communities as potentially vulnerable. However, due to the Project site's, such effects are likely not be minimal, and may include, for example, localized problems like sexual harassment that may arise as a result of an inflow of workers into the village if they are housed around the villages.
Project Affected Persons (PAPs): this group are those that have economic activities within the Project area of influence and therefore could be subject to some economic displacement impacts. Please refer to the Livelihood Restoration Plan (LRP) for additional details.
2. Stakeholders who may Participate in Implementation of the Project
Investor/Lender: entities that will give financing for the development of the Project. Specifically, they have an interest in ensuring that the Project is planned and implemented in line with their E&S standards and requirements, and they will monitor the Project's compliance with these requirements.
3. Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project
Central Government
Electricity Regulatory Authority (ERA): The ERA is the regulatory body responsible for licensing, regulating, and supervising the generation, transmission, distribution, sale, and use of electricity in Uganda. The ERA would be responsible for overseeing the licensing of the solar plant project and ensuring that it complies with technical and regulatory standards. ERA works in compliance with the Electricity Act of 1999. The ERA is responsible for the electrical licenses and permits, in addition to the safety guidelines and grid standards.

Ministry of Gender, Labour and Social Development (MoGLSD): The MoGLSD is the coordinating agency for community protection, empowerment, and safeguarding the rights and obligations of identified vulnerable groups for social protection. Their relevance as a stakeholder is to provide the project with the proper work place registration, abide by labour laws, and addressing cultural issues. The MoGLSD is responsible for ensuring the labour and worker rights are enforces properly on this project.
Ministry of Local Government: The Ministry is present to ensure political and social harmony, enhance economic growth, and reduce poverty.
The Ministry of Energy and Mineral Development (MEMD): is responsible for formulating and implementing policies related to energy in Uganda. The Ministry would be involved in granting permits and licenses for the solar plant project, as well as providing guidance on technical and regulatory issues. The ministry's mandate is to establish, promote, manage, and safeguard the rational and sustainable development and utilization of energy for social and economic development. The MEMD is responsible for providing the legal frameworks for policy issues within the sector, and providing the energy sector development plans. The MEMD is allied with the following organizations as well; UETCL and ERA.
The Ministry of Water and Environment (MWE): The ministry of Water and Development has the overall responsibility of the development, management, regulating water environmental resources. They are responsible for the approval of water extraction from the boreholes during the construction period.
Uganda Electricity Transmission Company Limited (UETCL): is responsible for the planning, construction, and maintenance of the national electricity transmission grid in Uganda. The company would be involved in the interconnection of the solar plant to the national grid. Essentially, UETCL purchases electricity in bulk from companies that generate electricity and sells it to distribution companies throughout the country. UETCL is Uganda's only authorised importer and exporter of electricity. The UETCL is responsible for the power excavation options, and according to the ESIA, information on the progress with the Olwiyo-Arua 132 kV line, in addition to the implementation of environmental and social safeguards during project implementation.
Uganda Investment Authority – The UIA is a statutory agency set-up under the investment code 1991 (revised in 2019) which follows the Ministry of Finance, Planning and Economic Development. The UIA initiates and supports measures that enhance investments in Uganda, in addition to advising the government on appropriate policies conclusive for investment promotion and growth. The UIA is responsible for providing the Investment requirements, electricity demand and projections and the planned industrial park developments.
West Nile Rural Electronification Company (WENRECo): WENRECo is an electric energy generation and distribution corporation in Uganda's Northern Region's West Nile sub-region. WENRECO is a wholly owned subsidiary of Industrial Promotion Services (IPS), which was formed after winning the concession to generate, distribute and sell electricity in the West Nile sub-region. WENRECo is responsible for Grid Operations, and providing regional grid status and power generation guidelines.
Local Governmental Agencies
Chamber of Commerce (branch in Arua) – Their mandate is to promote and protect the interests of the business community. Their significance to the following project is grid stability and quality status, in addition to the expectations from the proposed project and other power supply interventions. The Chamber of commerce follows the association of Uganda's National Chamber of Commerce and Industry which is essential according to the ESIA, for the information on grid stability, the grid's power supply and to reveal the project's anticipated expectations.
Directorate of Water Resources and Management (DWRM) - is responsible for managing and developing the water resources of Uganda in an integrated and sustainable manner in order to provide water of adequate quantity and quality for all social and economic needs for the present and future generations. The Directorate comprises of four departments namely Department of Water Resources Monitoring and Assessment, Department of Water Resources Planning and Regulation, Department of Water Quality Management and Department of International Transboundary and Water Affairs. The DWRM is a representative of the Ministry of Water and Environment within the project site.
Directorate of Environmental Affairs (DEA) - is responsible for environmental policy, regulation, coordination, inspection, supervision and monitoring of the environment and natural resources as well as the restoration of degraded ecosystems and mitigating and adapting to climate change. The DEA is representative of the Ministry of Water and Environment within the administrative division of the Project site.

The Directorate of Labour, Employment and Occupational Safety – is a representative of the Ministry of Gender, Labour and Social Development (MoGLSD). They are responsible for administering and enforcing the Occupational Safety and Health Act, No.9, 2006 and its Subsidiary Legislation, focusing specifically on the electrical installation safety.
Uganda National Roads Authority (UNRA) - is a government agency of the Ministry of Works and Transport in Uganda that is tasked with developing and maintaining the national road network, advising the government on general road policy, contributing to the resolution of national transportation issues, and performing other duties. UNRA is responsible for, among other things, contractor selection, construction supervision, maintenance scheduling, and prioritizing of national road works. In the context of this project, the site is located along the Nebbi-Arua highway, hence permission to construct line routing, and access requirements to the highway are from the UNRA. In addition, to the access requirement to the highway, and the permission to construct access and line routing.
Wetland Management Department (WMD): WMD is mandated to manage wetland resources and its goal is to sustain the biophysical and socio-economic values of the wetlands in Uganda for the present and future generations. Since the wetlands are a source of livelihood to the majority of the Ugandans and hence directly contribute to the National Development Plan, Vision 2040 and attainment of the Millennium Development Goals. Their responsibility to the project is permits for works in the wetland section. The WMD falls under the umbrella of Ministry of Water and Environment.
Madi-Okollo District Local Government (MDLG) – the 1997 Local government Act provides for decentralization and devolution of government functions, powers and services from the central to local governments and sets up the political and administrative functions of the local governments. The local governments are responsible for the protection of the environment at the Community District Officer district level. District and Sub-County local governments for the Madi Okollo district - District Environmental Officer, District Engineer, District Commercial Officer, LC3 (LCIII) – sub-county council, Area Land Committee Chief, and the LC5 representative are listed in the ESIA as the stakeholders since their responsibility is to provide all the necessary local development plans and essential environmental and social baselines, while also representing all local concerns and fears regarding the project and providing the development planning and permits. For example, the Area Land Committee Chief is essential for the process of acquiring land, and providing the project with the essential physical and construction planning permits.
Non-Governmental Organizations (NGOs) and Other Organisations
Action For Child Social and Economic Transformation (ACSET) - Uganda is an indigenous non-profit-organization registered in Uganda. Using a Right – Based – Approach, ACSET implements four inter-related and connected thematic areas, each of them with specific objectives to alleviate poverty in Uganda; Agriculture and Economic Development, Education and Vocational Skill Development, Renewable Energy and Clean Drinking Water, Health and Social protection. Focus on – **Economic Empowerment, Social Protection, and Agricultural Development for Livelihoods.**
Community Empowerment for Rural Development - a non-profit and an indigenous NGO. Their focus is on community mobilisation and capacity building through service delivery and implementation of micro-projects; on supply of social infrastructure services and implementation of agricultural projects, empowerment of women and the strengthening of their capacities to participate in the development process. ***They work in Northern Uganda and the West Nile Area & operate in Arua.*** Focus on – **Poverty reduction, promoting community resilience, and women & children rights.**
Fauna and Flora International – an international charity and NGO their focus is on protecting biodiversity (the diversity of life on Earth), which underpins healthy ecosystems and is critical for the life-support systems that humans and all other species rely on. Since, Uganda faces many threats, Natural habitats – particularly forests and wetlands – are being lost at an alarming rate, while poaching is also taking its toll on vulnerable species. The discovery of oil and gas within the Albertine Graben biodiversity hotspot and the impacts of climate change also have the potential to wreak havoc on Uganda's vitally important natural environment. Focus on – **Environmental and Habitat Protection, Biodiversity**
Initiative For Rural Empowerment (IRE) - IRE is a development organization dedicated to alleviating poverty by empowering the poor. Founded in 2003 in a rural village of Uganda, over the period of time it has grown to become one of the leading local NGO in Uganda, currently operating in 2 countries in Africa (Uganda and South Sudan). Focus on – **Social and Economic Empowerment, community resilience**
Uganda Solar Energy Association (USEA) - is an independent non-profit association dedicated to facilitating the growth and development of solar energy business in Uganda and East Africa region. USEA was formed in 2016 by private sectors companies that deal in solar energy business with help from private sector foundation, Ministry of Energy and Rural

Electrification Agency and it is registered under section 10 of the Societies Act. Their significance in the following table is because they provide the necessary information on solar PV investments, growth and challenges in Uganda.
National Organisation of Trade Unions (NOTU) - The National Organisation of Trade Unions (NOTU) was established by Decree No. 29 of 1973. It is currently the most representative labour centre in Uganda with 20 labour union affiliates. NOTU is a non-profit labour organization that represents millions of Ugandan workers and works with labour unions and community groups in all the districts of Uganda.
Media (Newspaper, Brochures, flyers, Posters, Television, Internet): They could disclose potential information and updates about the Project.
Academic Institutions
Energy Research and Development Centre (EDRC): The Ndejje University in Uganda has a Research and Development Centre; the centre provides a dedicated course unit that is offered to all engineering students. The course is titled ERDC, Energy Research and Development centre. Where interested parties research and study Hydro-electricity, Biomass, Solar energy, Wind energy and Biogas. Ndejje University and Uganda National Renewable energy and Energy Efficiency Alliance (UNREEEA) have signed a Memorandum of Understanding (MOU) for the establishment of a one-stop centre renewable energy.
East African Centre of Excellence for Renewable Energy and Energy Efficiency (EACREEE): The East African Centre for Renewable Energy and Energy Efficiency (EACREEE) was opened by the Minister designate of Uganda's Ministry of Energy and Mineral Development. The Minister underlined Uganda's government's sustained support that the energy sector's focus is to ensure the availability of sufficient, reliable, cost-effective, and environmentally friendly energy sources across borders; promoting electricity interconnectivity to facilitate the EAC's broader objectives of attracting investments and promoting competitiveness and trade. EACREEE's goal is to facilitate creation of an enabling environment for renewable energy and energy efficiency markets and investments, in order to contribute to: increased access of modern, affordable and reliable energy services, energy security and mitigation of negative effects (such as local pollution and GHG emissions).
Community Based Organizations
Rural Action Community Based Organization (RACOBAO): Their mission is to promote human rights of the most vulnerable people through community empowerment, engaging duty bearers and advocacy for accountability and quality services in targeted districts. Thematic Area: HIV prevention, care, and support, Advocacy and Human rights protection, Disaster Risk Reduction and Humanitarian Assistance, Basic Education promotion, Water and Sanitation, Nutrition and Food security, and Household and Community Economic transformation.
Namwendwa-Kamuli Community, community Based Organisation (NAKACO):is a registered CBO with the aim of Our improving the general standards of the underserved and vulnerable population through community-based involvement and empowerment programs in health, education, agriculture economic and environmental conservation in Namwendwa, Kamuli district, Uganda. we therefore aim at seeing a productive, health and sustainable society. Thematic Areas: Customary Land Rights, Environmental Justice, Gender-based violence, Health, Housing Rights & Informal Settlements, and Livelihoods.
Environmental non-for-profits
Green Jobs Initiatives Africa Ltd - a not-for-profit organization registered in Uganda in 2021 with the main focus of promoting employment in small and micro green enterprises with particular interest in young men and women. The initiative has three core objectives namely; Promoting the establishment of viable and sustainable green start-ups, supporting existing enterprises to become viable and sustainable, Promoting green skills development and access.
Uganda National Renewable Energy and Energy Efficiency Alliance (UNREEEA) - The Uganda National Renewable Energy and Energy Efficiency Alliance (UNREEEA) is a non-profit, non-partisan apex body for industry associations and actors involved in the renewable energy and energy efficiency subsector. Being the apex organization, UNREEEA works for a favourable environment for private sector participation in RE&EE in order to sustain its growth and development. Its aim is to facilitate growth in the Renewable Energy and Energy Efficiency sectors by coordinating, supporting, and representing members.

5. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below provides a summary of all stakeholders that were previously consulted and engaged throughout the Project – mainly as part of the ESIA that was undertaken for the Project. The table provides a summary of the stakeholder groups that were engaged, date of engagement, and the main objective and outcome.

The objective of such consultations was to:

- Introduce project (rationale, objective, location, key components, etc.)
- Explain and discuss overall methodology for ESIA study
- Explain and discuss key anticipated impacts as relevant
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study

The table below provides a summary of the outcomes of the stakeholder discussions conducted, while the figure below provides examples of photographs.

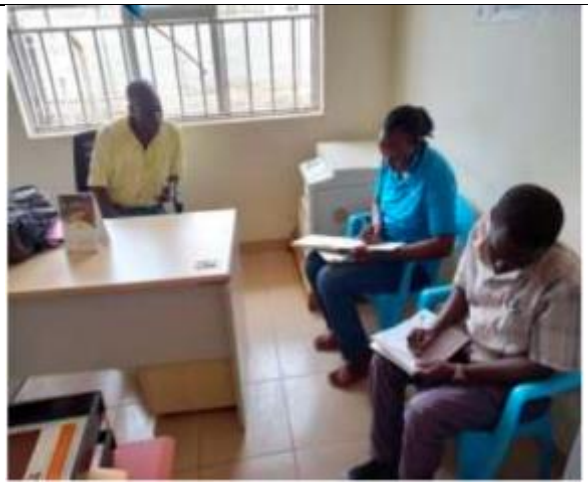
Table 2: Outcomes of Past Stakeholder Consultations

Entity	Representative	Description of meeting outcome
Central Governmental Entities		
ERA	Andrew Aloka, Senior Environment Officer, ERA Kasoba Albert, Project Officer, ERA Moses Otim, ESIA Team Leader, BIMCO Consultant Isaac Kifamuluzi, Environmental Specialist, BIMCO Consultant Amweno Norah, Sociologist, BIMCO Damalie Nanayanzi, Environmental Scientist, BIMCO	- Land Acquisition and compensation; a discussion about the valuations and approvals of rates by the Chief Government valuer. - The biological impacts were discussed. - The visual impacts were addressed, considering the project site was adjacent to the Nebbi-Arua highway. In addition to proposing the environmental and engineering measures to limit impacts. - A discussion of methodologies on how to avoid birds perching and littering on panels. - Consideration of measures to protect the crested cranes that range in the area and in the Ajai Wildlife reserve. - Site's geotechnical aspects; consideration of options and solutions. - Discussion and consideration of other necessary permits. - Ensuring the compliance with national regulations on waste management, directed towards solar panels, inverters and used oils.
UETCL	Wandera Constantine, Safeguards Officer, UETCL Lubega George, Environment Officer, UETCL Judith, Environment Officer, UETCL Moses Otim, Team Leader, ESG Specialist, BIMCO Waswa Sadic Babyesiga, Biodiversity Specialist	- Standards for the 132kV and 33kV line and overhead clearances, were discussed with UETCL. - The timelines for the transmission line were discussed. - The Grid Expansion reinforcement project was established from Kole to Arua, in addition to a discussion of applicable substations and their locations (districts). - A discussion on the impacts of the evacuation lines; the loss of vegetation and conservation concerns, the loss of land, land development and loss of livelihoods. - UETCL advised on the power evacuation options and links to the transmission line. - The incorporation of cumulative impacts since there is a possibility of resettlements in the area. - Managing the stakeholder expectations to avoid increased costs.

	Damalie Nanayanzi, Environmental Scientist, BIMCO	
Local Governmental Entities		
MDLG	Orabe Ismail, District chairman Duma Felix, A.g. District engineer Athocon Frida, A.g. DCDO	- Expressed their support for such investment projects, especially such environmentally friendly projects such as solar PV developments - Expressed their support, since the whole of Madi-Okollo district is in need of power security. They welcome any power initiative in the district. - Stated that the livelihoods in the area are already vulnerable and affected (in terms of agriculture, rearing of animals and the people will expect some in return). Therefore, arrange and meet with the community ahead of time and manage expectations and prepare the community to reduce conflicts. This is specifically necessary where the compensation of an affected persons is expected. - The environmental issues are key in project implementation; the community should be guided where to grow their plants and trees. Additionally, 100 drought resistant tree species should be provided. - Placing a grievance committee for the project, at the project level coordinating with the sub county and the district to address any and all complaints. - Avoiding the engagement of any children under the age of 18 years old, since including them in project activities is against the law. - Stressed the importance of discussing and controlling the social relationships between the community and project workers. If not guided and controlled such relationships may result in teenage pregnancies and possible sexual harassment, especially in female-lead households. - The importance of providing the personnel with the necessary Personal Protective Equipment (PPE), and constantly reinforcing their use on site.
Uleppi, Sub County Headquarters	Aduku John, Local Council III chairperson Adebo Ben sua, SAS Candiru Centenary, Parish Chief Madira Apollo Afeku Moses, Coordinator	- Expressed the support of the project beneficiaries being the entire West Nile region - The compensation of affected livelihood's was discussed. - The meeting additionally raised the discussion of buffer zones within the wetlands, and recovering the destroyed vegetation during the installation of the solar power plant. - The employment and job opportunities that the project generates should include both casual and technical workers and professionals. - Mitigating the social negative impacts of the construction workers was discussed. Establishing a camp, I close proximity to the site to ensure that they limit their mingling with the community. - Discussed methodologies to ensure continuous engagement with the district and sub county to reduce conflicts, especially in cases where compensation of affected persons is expected.
Non-Governmental Organizations supporting the district (list of partners)		
Development Partners	**Thematic Areas**	**Relationship (MoU/Agreement)**
Arua District Farmers Association (ARUDIFA)	Training of farmers, provision of advisory activities, set demonstrations, develop	signed MoU with the district

	bulking centers and form farmer, groups.	
CEFORD, Community Effort for Rural Development	Provision of advisory services, promotion of improved cassava variety	signed MoU with the mother district Arua
Development initiative for Northern Uganda	Promotes production, Market linkage and Nutrition	signed MoU with the district
GIZ	Livelihood activities and farmers groups, Capacity building for DLG in LED and public-private partnership	signed MoU with the district
NURI-Northern Uganda Resilience Initiative	Capacity building, Climate Smart Agriculture and Rural infrastructure and Rural water Development	signed MoU with the district
Gulu Agricultural Development Company (GADCO)	Buying produce e.g. simsim and cotton, registration of farmers	signed MoU with the mother district Arua
Local Community Representatives		
Local Community and village representatives	Local Village representatives	The community and leadership representatives were chosen according to their affiliation with the villages near the project site and are considered the community leaders for the Ombachi and Muni Village. The committee consists of many representatives of which are women, physically challenged, and many more that represent the vulnerable groups stated previously.

Meeting with Madi-Okollo Local Government Officials



Meeting with Madi-Okollo Local Government Officials

Meeting with Madi-Okollo Local Government Officials

Meeting with Madi-Okollo Local Government Officials

Meeting with the Ombachi Village

Meeting in Ombachi

Focus Group Discussion

Focus Group Discussion with Stakeholders

Meeting in Muni Village

Meeting in Muni Village

Figure 4: Sample Photos with MDLG Officials and community members

6. STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (as identified in Table 1 earlier), objective of consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

In particular, it is important to note that at this point, the following additional plans are being developed which are considered an integral aspect of this SEP.

- Livelihood Restoration Plan (LRP): As discussed earlier there are Project Affected Persons (PAPs) that have economic activities within the Project's area of influence. Those could be subject to economic displacement impacts. The LRP (as a standalone document) provides details on this including providing an entitlement framework for compensations and engagement requirements.
- Corporate Social Responsibility (CSR): The developer plans on supporting the local community, by reaching out to the governing party of both Ombachi and Muni villages. The CSR plan is to support the community with services that the village lack and areas of improvement. Such as, providing support in the local medical facilities, or through certain educational and academic means in the local primary school.
- Annual Environmental and Social Report: During the first quarter of each year, the Developer will prepare an annual environmental and social report that offers a review of the Project's environmental and social performance during the reporting year. The report will provide updates on the project's environmental and social performance, including the current timeline, important E&S concerns encountered and measures implemented, job opportunities created, and other pertinent information.

Table 3:Stakeholder Engagement Strategy and Plan

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the Project				
Residents of the nearby villages (the Ombachi and Muni Village) This would also include vulnerable groups (Women, disabled, elderly…)	Disclosure of Stakeholder Engagement Plan (SEP) including the Grievance Mechanism.	Hardcopy of the SEP to be available in both the Ombachi and the Muni village center.	Once before construction (to be updated when required)	Developer (CLO)
		Summary advertisement of the grievance mechanism to be posted at key local community platforms to include: (i) CBO's (including women CBOs in particular); (ii) villages bulletin boards for announcements, and/or; (iii) church boards.	Once before Construction (to be checked regularly to ensure proper distribution)	Developer (CLO)
	Updates on the Project including Environmental and Social issues and CSR activities undertaken.	Prepare leaflet with updates on the project including the environmental and social issues. This could include updates on the project development, number of employment opportunities allocated for local community members, construction plans, updates on the CSR programs implemented, etc. Leaflet to be disclosed at key local community spaces and platforms to include : (i) CBO's (including women CBOs in particular); (ii) villages bulletin boards for announcements, and/or; (iii) church boards.	Semi-annually during construction Annually during Operation phase	Developer (CLO)
		Hardcopy of the Annual environmental report to be available and accessible in both villages (Ombachi and Muni).	Annually – 1st quarter of each year	Developer (CLO)
Project Affected Persons (PAPs)	Ensure engagement requirements and livelihood restoration measures are implemented in accordance with LRP.	Refer to LRP	Refer to LRP	Developer (CLO)
Stakeholders who may participate in implementation of the Project				
Investor/Lender	Updates on the Project including the environmental and social issues (e.g. environmental	Individual/Internal Meetings (if required)	TBD.	Developer team as applicable.

	performance, grievance mechanism implementation, community integration plan, etc.)			
Stakeholders who may have a possibility to influence and make decisions on implementation of the Project and/or may have an interest in the Project				
Central and Local Government				
Ministry of Gender, Labor and Social Development. Directorate of Labor, Employment and Occupational Safety	Determine and agree on the key principles and methodology of implementation for the local recruitment and procurement procedure. Some may require to undertake certain inspections.	Individual/Internal Meetings (if required) Correspondence and Official Letters	When required during the construction and operation.	EPC Contractor/ Project Manager
Ministry of Water and Environment Directorate of Water Resources and Management Directorate of Environmental Affairs Wetland Management Department (WMD)	Coordination and necessary approvals for the disposal of hazardous waste, water extraction from boreholes, … Coordination of contractors approved for wastewater collection. Coordination to secure the projects water requirements. Obtain necessary permits for working on wetland section.	Individual/Internal Meetings (if required) Correspondence and Official Letters	Once before Construction Once before Operations	EPC Contractor/ Project Operator

Electricity Regulatory Authority (ERA) Ministry of Local Government The Ministry of Energy and Mineral Development (MEMD) Uganda Electricity Transmission Company Limited (UETCL) Uganda Investment Authority	Some governmental stakeholders might require to undertake certain inspections or auditing exercises, or some might require certain updates and information on the implementation of the project.	Individual/Internal Meetings (if required)	Upon occurrence	Developer team as applicable
		Correspondence and official letters (if required)	Upon occurrence	Developer team as applicable
West Nile Electrification Company (WENRECo) Chamber of Commerce Uganda National Roads Authority (UNRA) Madi Okollo Local Government Ministry of Water and Environment Directorate of Water Resources and Management Directorate of Environmental Affairs Wetland Management Department (WMD) Ministry of Gender, Labor and Social Development.	Updates on the project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR programs implementation, …)	Email notification. Annual environmental report to be disclosed on the company website.	Annually – 1st quarter of each year	Developer (CLO)

Directorate of Labor, Employment and Occupational Safety				
Madi Okollo Local Government	Develop the CSR program	Undertake the targeted consultations with head of the local communities to identify the priority developments to be implemented as a part of the Corporate Social Responsibility Program. Additional information will be updated into the SEP.	Before construction	EPC Contractor
Non-Governmental Organizations (NGOs) And Other Organizations				
Action For Child Social and Economic Transformation (ACSET) Community Empowerment for Rural Development Fauna and Flora International Rural Initiative for Community Empowerment Uganda Solar Energy Association Energy Research and Development Center Rural Action Community Based Organization Green Jobs Initiative Africa Ltd. Uganda National Renewable Energy and	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR program implementation…) Undertake targeted consultations with representatives to investigate potential for collaboration in developing and implementing CIP requirements to include local recruitment and procurement procedure as well as social responsibility programs.	Email notification. Annual Environmental Report to be disclosed on the company website.	Annually – 1st quarter of each year	Developer (CLO)

Energy Efficiency Alliance.				

7. CONTACT DETAILS AND REPORTING

Throughout the Project, all stakeholders can contact the Developer throughout the contact details provided below.

Contact Details for the Public

Community Liaison Officer (CLO) – AMEA Power

Name: Simon Byakutaaaga

Address: Kampala

Telephone: +256-758-132593 /+256-778-744895

E-mail: simon.byakutaaga@ameapower.com

In addition, the Developer intends to provide all relevant information to the public and which will include but not limited to the following:

1. Environmental and Social Impact Assessment (ESIA);
2. Stakeholder Engagement Plan (SEP);
3. Non-Technical Summary (NTS);
4. Livelihood Restoration Plan (LRP)

The above will be provided at the Developer's website at the following link www.ameapower.com

In addition, hard copies of the above will be available at the following locations. These documents will remain in the public domain for the duration of the Project, and will be updated as appropriate.

- **Uleppi LC3 Chairman Office/ Mr Adaku John**
  Location: Uleppi Subcounty Headquarters
  Tel: 0782104190

- **Laura Parish Chief Office/ Ms Centenary Candiru**
  Location: Uleppi Subcounty Headquarter
  Tel: 0775-551764

8. STAKEHOLDER GRIEVANCE MECHANISM

8.1 Introduction and purpose

Grievances and concerns are bound to occur from the earliest or inception phase, throughout the life of the project. The activities and operations of the consultant at planning phase; and those of the contractor at implementation phase can result into undesirable social-economic and environmental impacts, which may annoy, irritate or cause feelings of discomfort and unfairness among different stakeholders which affect the license to operate, the progress of the works and the ability of affected persons to enjoy the benefits of the project. This section describes the Grievance Mechanism (GM) that has been adopted to address all project related grievances in an efficient, transparent, timely and cost-effective manner. It allows for full participation of stakeholders in addressing project related disputes that affect them. Managing grievances therefore becomes an integral part of the project stakeholder engagement strategy.

The Developer recognizes that the management of grievances is an important aspect of stakeholder engagement and a vital aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (both real and perceived) and if not addressed and resolved, they can escalate. Identifying and responding to grievances fosters the development of positive relationship between projects, communities and other stakeholders. Monitoring of grievances will identify and signal any recurrent issues, or escalating conflicts and disputes.

The purpose of the GM is to put in place a simple and easily accessible systematic process for recording, processing and promptly resolving grievances and concerns raised during the RAP and ESIA detailed studies and during project implementation. The aim of the GM is to achieve mutually agreed resolution of grievances raised by stakeholders and other parties. The developer will implement a grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. The developer will accept all comments and complaints associated with the project and individuals who submit their comments or grievances have the right to request that their name be confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulation of Uganda.

The developer will monitor the way in which grievances are being handled and ensure that they are properly addressed within deadlines specified within the mechanism presented below. The developer will also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

8.2 Objectives

The specific objectives of the GM are:

- To provide to the Project Company stakeholders at different levels with a clear mechanism of channeling grievances;
- To operationalize the policy statement on Grievance Management in the Project Environment and Social Management System by setting-up and making known to all stakeholders a clear, accessible and efficient system for receiving and resolving grievances for all stakeholders;
- To record, categorize and prioritize the grievances;
- To provide an accessible, transparent and efficient complaint procedure for the Project stakeholders;
- To provide an environment that fosters free and honest exchange of information, views, and ideas in regard to resolving received grievances;
- To provide and define clear roles and responsibilities of the various parties involved in handling and resolving grievances;
- To promptly resolve the grievances in consultation with relevant stakeholders and have such grievances closed out within a specified timeframe;

- To escalate unresolved grievances to other relevant offices or authorities in line with GM procedure.

8.3 Sources of grievances

During the ESIA and LRP studies phase, most grievances are likely to arise or emanate from the following scenarios:

- Unclear boundaries and disagreement over the size of the affected land.
- Inadequate consultations/lack of information among stakeholders
- Unclear or unknown valuation and survey methods among community members
- Land boundary and ownership disputes between different parties.
- False identification of property
- Lack of clear and updated compensation rates.
- Family related disputes/issues over land. Disagreements among family members on who ought to receive the resettlement packages
- Multiple and unclear interests on land especially under customary and communal tenure.
- Lack of disclosure of relevant project related information specifically for the LRP and ESIA studies.
- Conduct and behaviour of consultant staff
- Speculation activities along the alignment
- Unrealistic demands and expectations from some project stakeholders
- Exclusion of women and minority groups in decision making processes of the project

At implementation of LRP, the likely grievances include:

- Poor intra-house distribution of compensation, mainly affecting women leading to domestic violence and family breakdown.
- Delayed compensation and depreciation of compensation rates.
- Commencement of construction before compensation

During construction phase, grievances are likely to arise from but not limited to the following scenarios:

- Casualties, fatalities, damages to sensitive ecosystems and productive assets,
- The spread of diseases and or sexual violence,
- Delayed completion of essential works, cost increases, and unsatisfactory road conditions,
- Segregation and racial misconduct at places of work
- Reduced access to community social services and resources
- Population influx within the project, leading to extra marital affairs and domestic violence
- Blocked access roads
- Poor and irregular stakeholder engagement
- Project destruction/disruption of public utilities

- Sexual harassment and rape from project workers
- Noise from quarries and vehicles

8.4 Grievance principles

The proposed GM will be informed by the following principles:

1. The GM is binding and legitimate: the GM resolutions should be binding and sufficiently legitimate and process free from interference.
2. The GM is affordable and accessible: the GM must be made known to all stakeholders including relevant time frames in the process and provide adequate access points and services to promote use and trust. The access to the GM is free of charge.
3. The GM is transparent in process and resolution/outcome implementation
4. The GM promotes equal opportunity for all parties to use the system and it must be free of coercion and reprisals.

Stakeholder Grievance Mechanism

1. A grievance disclosure sheet (Annex 3) will be disclosed at the locations identified below. The grievance disclosure sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
    a. Chairman's home address nearest to the Project site
    b. Chairwoman's home address nearest to the Project site
    c. Entrance office of the Project Site
2. Stakeholder willing to lodge a grievance should be acle to use the following avenues:
    a. Grievance sheets (Annex 1) along with grievance boxes will be made available at the following locations:
        - **Office of the Uleppi LC3 Chairman**
          Location: Uleppi Subcounty HQ (500 metres from Project Site)
          Telephone: 0782104190
        - **Office of the Laura Parish Chief**
          Location: Uleppi Subcounty HQ (500metres from Project Site)
          Telephone: 0775-551764
    b. Direct Contact through the following:
       Community Liaison Officer (CLO)
       Name: Simon Byakutaaaga
       Address: Kampala
       Telephone: +256-758-132593 /+256-778-744895
       E-mail: simon.byakutaaga@ameapower.com
    c. All grievances (regardless of method of submission, i.e., phone, mail, grievance form) will be recorded on a grievance log sheet by the CLO (Annex 4).
3. Grievance procedure starts with the formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission at the village level, and up to 14 days at the district level (if not handled at the village level). If the grievance is not well understood or additional information is required for clarification, it will be sought from the complainant during this step.
4. In coordination with the relevant personnel, the CLO will analyse the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable).

5. The CLO will prepare a grievance resolution form (Annex 2) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within twenty (21) days of receiving the grievance.
6. The grievance resolution form must be approved and signed-off by the Developer's Project Manager.
7. The outcomes of the grievance resolution form will be communicated to the complainant by the CLO in accordance with the preferred method of communication specified.
8. In the case the grievance resolution form identifies proposed action to be implemented, the CLO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The CLO will contact the complainant once actions are completed in accordance with the preferred method of communication specified.
9. Upon receiving the grievance, a grievance closeout form (Annex 5) will be prepared to be signed off by the CLO and the complainant that will detail the solution that was implemented to resolve the grievance.
10. The CLO will ensure that the grievance forms, grievance log sheet, grievance resolution form, and grievance closeout form are updated and maintained onsite at all times.
11. The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
12. The use of the grievance mechanism shall not impede access to Judiciary means.
13. The grievance mechanism allows submission of anonymous complaints by community members, especially in the cases of sexual harassment and/or rape.

A workers' grievance mechanism will be established for the employees of the Developer and his contractors as a separate system. The grievance mechanism should guarantee confidentiality. Workers will be given the possibility to lodge grievances both through workers representatives and unions and independently, personally, regardless of the matter of the complaint. Anonymous lodging will also be made possible. The grievance procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact, and how, will be made available as described above. In particular all workers will be informed of the Grievance Process and new workers will be informed when they join the project. Information contact points will be posted on staff information boards and on-site information boards.

8.5 Reporting, monitoring and review.

The CLOs will make weekly grievance management reports to the Project Manager and Social Specialist. The Social Specialist will make and submit weekly and monthly grievance management reports to the Project Manager and Sponsor ESG team. The weekly and monthly reports will highlight information regarding the status, management, coordination and implementation of the GM.

Key indicators relevant for the weekly and monthly GM reporting will be:

- No of grievances received / month or week
- No. of outstanding grievances currently within each tier of the GM
- No of outstanding grievances and reasons for non-resolution
- No of resolved and closed out grievances
- No of closed out grievances on stipulated time period allowed
- No of closed out grievances outside the stipulated time allowed
- No of escalated grievances and reasons

In line with the relevant indicators, monitoring is to be done on the effectiveness of the grievance mechanism. As part of the monthly review/report, analysing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism.

9. ROLES AND RESPONSIBILITIES

This chapter identifies the roles and responsibilities related to implementation of the SEP.

Project Manager – AMEA Power

- Ensure resources required are available for the implementation of this Stakeholder Engagement Plan
- Oversee the overall implementation of this Stakeholder Engagement Plan
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Community Liaison Officer (CLO) – AMEA Power

- Update the SEP as required during the implementation of the project to include construction and operation
- Overall responsibility for implementing the requirements of the stakeholder engagement strategy as identified under Table 3 earlier
- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, filling grievance resolution forms and grievance close-out forms.

EPC Contractor / Project Operator

- Implementing the requirements of the stakeholder engagement strategy as applicable and as identified under Table 3 earlier
- Submission of proof of completion of required engagements to Developer CLO

ANNEX 1

Public Grievance Form

Reference No.	
Full name	
Note: *you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*	○ I wish to raise my grievance anonymously ○ I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: please provide mailing address: _____ _____ _____ By Telephone: _____ Other (please Specify): _____
Language *Please mark your preferred language for communication.*	○ English ○ Other: _____
Description of Concern/ Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Concern/ Incident / Grievance	
	○ One time incident/grievance (date:_____). ○ Happened more than once (how many times?_____). ○ On-going (currently experiencing problem).
What would you like to see happen to resolve the problem?	
Signature: **Date:**	
PLEASE INSERT FORM IN GRIEVANCE BOXES	

ANNEX 2

Grievance Resolution Form

How was the grievance received?	
Reference No.	
Description of Concern, Incident or Grievance: *What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?*	
Date of Grievance	
Has the concern /grievance / incident been resolved?	○ Yes ○ No; ***if not provide a justification below***
Fill out either section 1 or section 2 (below)	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CLO Signature:

Date:

CSR Manager:

Date:

ANNEX 3 - Grievance Disclosure Sheet

Any stakeholder or member of the local community who wishes to file a complaint regarding the project should utilize the channels listed below. The mechanism tackles all project-related grievances, including those relating to construction or operation activities, inappropriate worker conduct, and others.

The grievance mechanism shall be implemented quickly and effectively, at no charge, and without retribution against the party that raised the complaint or issue. In addition, the usage of the grievance mechanism will not obstruct access to judicial methods, and community members will be able to submit grievances anonymously.

Grievance Sheets with grievance boxes will be made available at the following locations:

- **Office of the LC3 Chairman Uleppi Subcounty**
  Location: Uleppi Subcounty HQ (500 metres from Project Site)
  Tel: 0782104190
- **Office of Laura Parish Chief**
  Location: Uleppi Subcounty HQ (500 metres from Project Site)
  Tel: 0775-551764

In addition, grievances can be made through direct contact with the following:

Community Liaison Officer (CLO) –

- Name: Afeku Moses
- Address: Uleppi
- Telephone: +256-776-958191

Annex 4 – Grievance Log Sheet

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

Annex 5 – Grievance Closeout Form

GRIEVANCE CLOSE-OUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	

CLO	**Complainant**
Name:	Name:
Date:	Date:
Signature:	Signature