



Stakeholder Engagement Plan



CIMAF Senegal

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CIMAF Senegal



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Acronyms and Abbreviations

Name	Description
AIBD	Blaise Diagne International Airport
CIMAF	Ciments de l'Afrique
EHS	Environmental, Health and Safety
EHSS	Environmental, Health, Safety and Social
ESIA	Environmental and Social Impact Assessment
GMS	Grievance Management System
GN	Guidance Note
IFC	International Finance Corporation
NGO	Non-Governmental Organization
PS	Performance Standard
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 Context

Ciments de l’Afrique (CIMAF) was established in 2011 with a mission to produce, market and develop innovative materials and services for the construction sector, while respecting national and international standards for process and environmental protection.

CIMAF is currently preparing to develop a Limestone Quarry and Cement Production Plant in the Thies Region of Senegal (hereafter referred to as “the Project”).

An Environmental and Social Impact Assessment (ESIA) was undertaken for the Project in 2019 in accordance with legislative and regulatory requirements in Senegal. In order to secure financing from the International Finance Corporation (IFC), the ESIA is presently being updated in accordance with the requirements of the IFC Environmental and Social Performance Standards (hereafter referred to as “the Performance Standards”).

In accordance with the recommendations of the updated ESIA, Environmental Resources Management (ERM) was engaged to prepare the present Stakeholder Engagement Plan (SEP).

1.2 Project Description

The CIMAF Project site is located in the commune of Keur Moussa, which is in the department of Thies, Senegal. The site is approximately 50 km east of the capital city of Dakar, and approximately 5 km south the N2 National Road. The Project site will cover an area of 331 ha within the Classified Forest of Thies.

The Project location is indicated in the figure below.

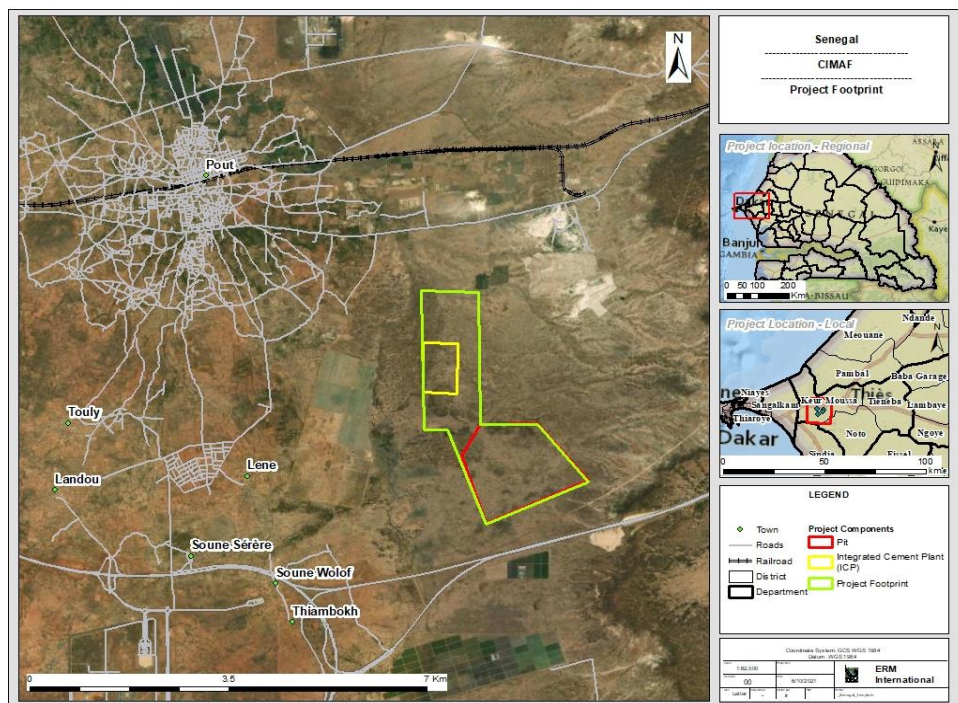


Figure 1-1 Project Location

The commune of Keur Moussa has experienced high levels of public and private sector development in recent years. The new Blaise Diagne International Airport (AIBD) is located approximately 6 km southeast of the Project. The recent extension of the A1 Highway also extends to the south of the Project site, connecting the cities of Dakar and Thies. Cumulative impacts of the numerous projects surrounding the Project site are addressed in the updated ESIA and will influence the approach to engagement to be taken by the Project (see Section 4).

The Project will consist of two phases: construction, which is expected to take approximately 18 months, and operations, which is expected to extend for a period of up to 100 years.

The Project will have two components:

- **Quarry:** Occupying an area of 250 ha within CIMAF's 520 ha exploration permit, the limestone quarry will be developed through stripping to expose the limestone rock and mining to fragment the limestone into rubble (including one blasting event per week).
- **Cement Plant:** The Project will include installation a new clinker line and a new cement grinding and dispatch line. Plant facilities will include production workshops, storage halls, and an electrical supply network. The plant will be connected to the national energy grid. Cement will be packed onsite, loaded manually and transported off site by truck.

Additional facilities and infrastructure to be constructed for the Project include:

- Administrative building with a main control room and laboratory;
- Cafeteria;
- Infirmary;
- Dressing / locker room;
- Mosque;
- Security post;
- Perimeter fence;
- Concrete walkways around the production workshops;
- Internal roads and parking lots; and
- Paved access road to the site from the N2.

The Project is expected to employ approximately 800 people during the construction phase, 10% of whom will be skilled workers (i.e., engineers, managers). During the operations phase, the Project will employ approximately 280 people, including 80 CIMAF employees and 200 contractors and their personnel. There will be no accommodation for workers built on site.

The Project's water supply will require construction of a compartmentalized basin with a water treatment system and set of pumps and devices required for operation of the plant and firefighting. The quarry's water needs are estimated at 10 l/tonne of limestone produced, and those of the plant at 80 l/tonne of clinker. The Project intends to drill a borehole from which it will draw its water; it is estimated that the water table is at a depth of 200 m.

The Project will be built in accordance with applicable legislative and regulatory requirements in Senegal pertaining to environmental, social and health and safety standards, as well as the requirements of the IFC Performance Standards and the World Bank Group's Environmental, Health and Safety (EHS) Guidelines for Construction Materials Extraction and for Cement and Lime Manufacturing.

Protective measures will be put in place to minimize impacts on the environment and surrounding communities, including the use of bag filters for dust collection, construction of covered conveyors, installation of equipment to reduce noise levels, and continuous analysis of gases at the chimneys.

1.3 Engagement Principles and Objectives

Stakeholder engagement is a fundamental part of responsible project development. It allows for two-way communication between the project proponent and the persons and groups who will be affected by its development.

Engagement serves as both a risk management tool – allowing projects to identify and address issues or concerns proactively – and a vehicle through which the project can contribute to building local capacity and support sustainable development.

To this end, the Project will carry out stakeholder engagement in accordance with the following principles:

- **Transparency:** the Project will communicate accurate and comprehensive information to stakeholders in an appropriate language and accessible format;
- **Accountability:** engagement will foster two-way-communication, enabling the Project to share information with stakeholders and for stakeholders to raise and have addressed their questions and concerns; and
- **Timeliness:** information will be shared proactively and adequate time will be allowed for stakeholders to consider and provide a response in accordance with local consultation and decision-making processes.

The objectives of the Project's stakeholder engagement activities, and of the present SEP, are as follows:

- To identify and map all persons and groups with an interest in or influence over the Project and its activities;
- To design and utilize engagement mechanisms adapted to local language, culture and consultation and decision-making processes;
- To enable meaningful participation by disadvantaged or vulnerable persons and groups in the engagement process;
- To put in place an accessible grievance management system that will enable the timely resolution of issues or concerns raised by stakeholders;
- To maintain accurate records of the engagement process, including any commitments made by the Project and the registration and resolution of grievances; and
- To monitor and report on engagement activities in order to facilitate continuous learning and inform adjustments to the engagement process and mechanisms.

It is important to note that stakeholder engagement is fundamental to the management of the Project's social and environmental risks and impacts. The Project's relationships with external stakeholders can have an influence not only on its permitting and approvals processes, but on its ability to access the Project site, recruit workers, and operate in harmony with surrounding communities. To this end, and as represented in the figure below, stakeholder engagement is central to the implementation of the Project's Environmental and Social Management Plan, as well as other key management plans required in accordance with the updated ESIA, and must continue to underpin Project activities throughout the construction and operations phases.



Figure 1-2 Stakeholder Engagement Connections

2. STAKEHOLDER ENGAGEMENT REQUIREMENTS

This section presents the national legislative and regulatory requirements that pertain to stakeholder engagement in Senegal, as well as the relevant lender standards applicable to the Project. CIMAF has no corporate policies in place related to stakeholder engagement.

2.1 National Requirements

Senegal's Law on the Environment Code (Loi n°2001-001) sets out the rules and procedures that apply to any project that may have an impact on the environment. Impacts to be considered include biophysical impacts, social impacts, impacts on human health, welfare and needs, impacts on renewable and non-renewable resources, and displacement impacts.

Projects that will have an impact (as defined in Law 2001-001) are subject to either an authorisation or a declaration, depending on the severity of the impacts and the risks associated with the project (Articles 10 and 11). Industrial projects are typically considered as having severe impacts and are therefore classified as First Class and require an authorisation from the Minister of Environment.

Participation of the public in decision-making is listed as a fundamental principle of Senegal's Environment Code (Article 4). Any project or activity that may have an impact on the environment is required to carry out an impact assessment as part of the authorisation or approval process (Title 2 - Chapter 5). Article 48 states that the impact assessment process should aim to avoid and to minimize any negative impacts, and if appropriate, provide for public participation in the process. Public participation is defined as engagement in the decision-making process, and includes three steps: information, consultation, and a public audience (Article 2).

The original ESIA prepared for the Project in 2019 was developed in accordance with national requirements, including consultation during its development and a public audience upon completion. The updated ESIA currently being prepared for the Project will be completed in accordance with national requirements and applicable international lenders standards, as discussed in the next sub-section.

2.2 International Standards

The IFC Performance Standards are a widely accepted framework for managing impacts and risks associated with private sector development projects and are largely complementary to national regulations of Senegal. As the Project will receive financing from the IFC, compliance with the requirements of the Performance Standards will be required throughout the Project life cycle.

Performance Standard 1: Assessment and Management of Environmental and Social Risks describes how environmental and social issues should be managed during project development and serves as the foundation on which the other Performance Standards (PS) are built. One of the objectives of PS1 is "to promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated." Stakeholders are defined as "persons, groups or communities external to the core operations of a project who may be affected by the project or have interest in it." (PS1, GN95).

The purpose of stakeholder engagement is to establish and maintain constructive relationships with stakeholders over the life of the project. The level of engagement necessary depends on the nature, risks and impacts of the project. Appropriate engagement mechanisms range from basic external communication channels to comprehensive consultation processes.

An effective engagement process allows the "views, interests and concerns of different stakeholders, particularly of the local communities directly affected by the project...to be heard, understood, and taken into account in project decisions and creation of development benefits." (PS1, GN6)

IFC clients are required to develop and implement a Stakeholder Engagement Plan in accordance with the project risks, impacts and development stage. The SEP must be tailored to the characteristics and interests of project-affected communities. Specific requirements of PS1 related to stakeholder engagement include:

- Engaging on the basis of the timely and effective dissemination of relevant project information;
- Using languages and methods preferred by stakeholders;
- Including differentiated measures to allow effective participation of disadvantaged or vulnerable groups or persons;
- Establishing a grievance mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the project's environmental and social performance; and
- Including stakeholder engagement practices in monitoring plans in order to improve performance and address gaps.

The IFC's Good Practice Handbook on Stakeholder Engagement for Companies Doing Business in Emerging Markets (2007) also provides guidance on international best practice in stakeholder engagement and has been consulted during the preparation of the present SEP.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder analysis is undertaken to identify individuals and groups that may have an interest in and/or influence over a project, and to inform the design of appropriate engagement measures on that basis. In accordance with the requirements of PS1, particular importance must be given to the identification of disadvantaged or vulnerable persons or groups for whom specific measures may need to be taken in order to ensure their meaningful participation in the engagement process.

3.1 Area of Influence

The updated ESIA defined the Project's Area of Influence (AoI) as a 5 km radius around the centre of the Project site. The AoI includes the nine communities listed in the table below, which were consulted as part of the updated ESIA process in March 2021.

Table 3-1 Project-Affected Communities

Community	Estimated population
Gap	1 300
Lene	1 100
Nangane	150
Palal	3 000
Palal Peulh	38
Soune Serer	3 015
Soune Wolof	410
Thiambokh	N/A ¹
Thiambokh Peulh	300
TOTAL	9 275

The Project's AoI and the communities located within it are identified in the figure below.

¹ It was not possible to collect data in the village of Thiambokh as part of the updated ESIA process. An initial meeting was held with the Village Chief, elders, and representatives of women, youth, farmers and herders, however, the community refused to participate in any further consultation on the basis of the claim that they were not included in the initial consultation or the public audience for the original ESIA in 2019. The participants in the meeting were clear to stress that they are not opposed to the Project in principle, but that they will not participate in any additional consultation until they are presented with the information from the original ESIA.

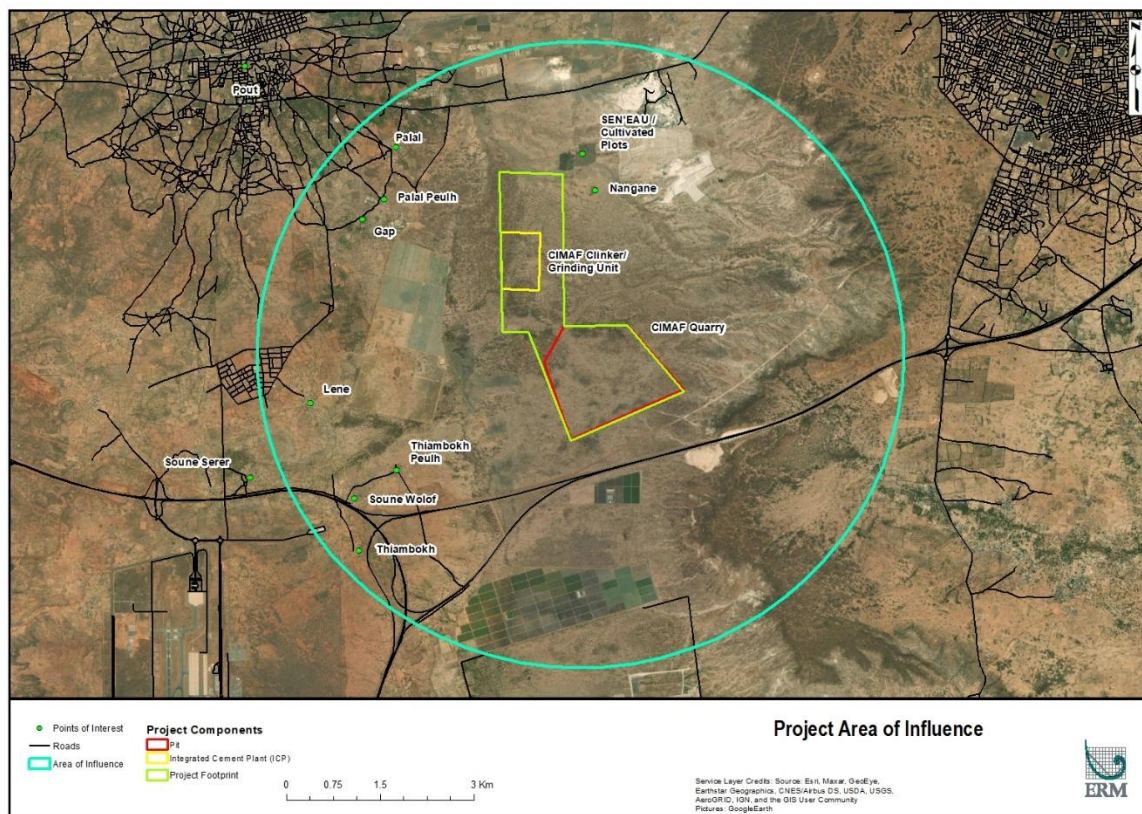


Figure 3-1 Project Area of Influence

3.2 Population and Demographics

The communities in the Project’s Aoi are predominantly Serer is the third largest ethnic group in Senegal (approximately 17% of the national population) with its own language and cultural practices.² The Serer people live predominantly in western Senegal and are the dominant ethnic group in the Project Area, making up the majority of residents of the six villages in the Project’s Aoi: Gap, Lene, Palal, Soune Serer, Soune Wolof and Thiambokh. These communities are interconnected, through marriage and small-scale trade and commerce.

Three Peulh communities are located within the Project’s Aoi: Nangane - a hamlet of Daral Peulh, which is located on the northern side of the RN2 and outside the Project’s Aoi; Thiambokh Peulh - a hamlet of Soune Wolof, located to its east; and Palal Peulh - a hamlet of Palal, located to its south, on the western edge of the Classified Forest. Traditionally, Peulh in Senegal were a nomadic people whose livestock migration routes crossed the country from north to south in accordance with the availability of fodder throughout the dry season. In recent years, some Peulh communities have established semi-permanent structures in peri-urban areas where they maintain year-round residency, as is the case in the communities of Nangane, Thiambokh Peulh, and Palal Peulh.

The Peulh in Senegal have a distinct language and cultural practices, and despite adopting more sedentary lifestyles, continue to generally live apart from other ethnic groups. As is the case in the Project’s Aoi, Peulh are not often represented in local and regional governance structures or decision-making bodies.

² <https://www.cia.gov/the-world-factbook/countries/senegal/#people-and-society>

In the case of Nangane, Thiambokh Peulh and Palal Peulh, no inter-community conflict was reported. Though administratively, all three communities are considered hamlets of larger villages, the Peulh communities see themselves as distinct and largely self-reliant.

The communities in the Project's AoI fall within the Commune of Keur Moussa, which is led by an elected Mayor. Each of the communities in the Project's AoI is led by a hereditary Village Chief, who is supported by a group of elders. Village Chiefs and elders are typically male, with women rarely being represented or able to participate directly in traditional decision-making structures.

3.3 Community Groups

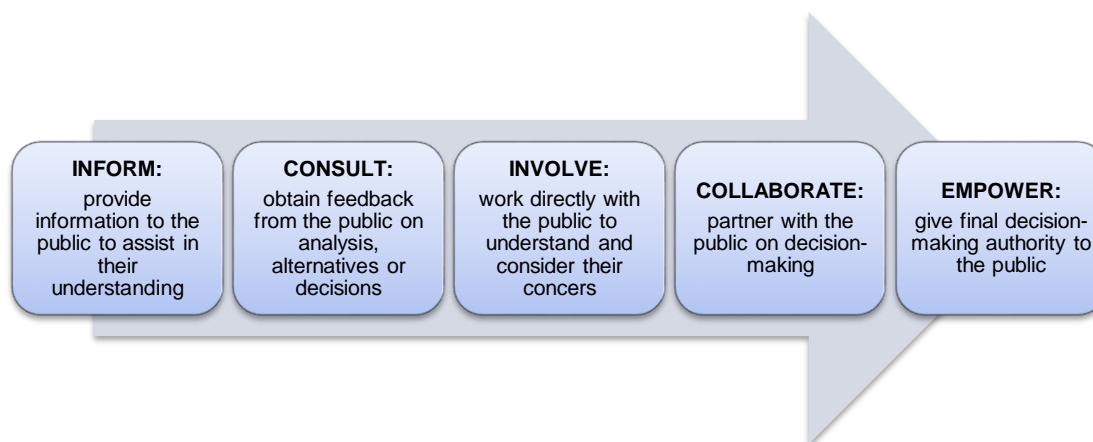
Community associations within the Project's AoI include women's groups and youth groups (with male members only), which are organized at the village level to work on issues of common concern. Women's groups often practice revolving savings and loans schemes amongst their members to provide financing for small-scale livelihood activities. The women's group in Soune Sere is particularly well organized and active, having reportedly received capacity-building support from the Non-Governmental Organization (NGO) ENDA Tiers Monde on issues including deforestation and financial management. ENDA Tiers Monde was established in 1972 with a mission to address rural poverty and environmental degradation, and is the only NGO reported to be active in the Project's AoI.³

Many male youths from the Project's AoI are students in Dakar, who are able to live in or more frequently visit their communities due to the recently constructed highway system. During consultation in March 2021, youth group leaders reported their primary priorities to be employment of youth and more generally, advocating with government to increase their communities' access to land and services.

Herders in the Project's AoI recently established an association at the level of the commune, which is beginning to organize in order to advocate on behalf of the needs and priorities of its members. Despite agriculture being reported as the primary livelihood activity in Serer communities in the AoI, the farmers in the area did not report to be organized into any type of group or association.

3.4 Stakeholder Analysis

The table below presents the key stakeholders in the Project's AoI, identified on the basis of the original ESIA and the consultation process carried out in March 2021. The table identifies each stakeholder's level of interest in and potential influence over the Project (1 below lowest, 5 being highest), and recommends the appropriate level of engagement in accordance with the following spectrum for public participation.⁴



³ <https://www.facebook.com/EndaTiersMonde/>

⁴ The International Association for Public Participation (IAP2) designed the Spectrum of Public Participation to assist with the selection of the level of participation that defines the public's role in any public participation process. More information is available online: www.iap2.org.

Figure 3-2 Spectrum of Public Participation

Table 3-2 Stakeholder Analysis

Stakeholder	Level of Interest (1-5)	Level of Influence (1-5)	Level of Engagement
Government Stakeholders			
Governor of Region of Thies	3	5	Inform
Prefect of Thies	3	4	Consult
Sub-Prefect of Keur Moussa	4	4	Consult
Mayor of Keur Moussa	5	3	Involve
Regional Directorate of Environment	5	4	Consult
Regional Inspection of Water and Forests	4	4	Consult
Regional Service of Mines and Geology	4	4	Consult
Regional Director of Rural Development	3	3	Consult
Regional Service of Hydrology	3	3	Consult
Regional Inspection of Labour	5	4	Consult
Forest Brigade of Keur Moussa	3	3	Consult
Military / Police	2	4	Inform
Community Stakeholders			
Village Chief - Gap	4	3	Collaborate
Residents - Gap	4	2	Collaborate
Village Chief - Lene	4	3	Collaborate
Residents - Lene	4	2	Collaborate
Village Chief - Palal	4	3	Collaborate
Residents - Palal	4	2	Collaborate
Residents – Palal Peulh	4	2	Collaborate
Village Chief - Soune Serer	4	3	Collaborate
Residents – Soune Serer	4	2	Collaborate
Village Chief - Soune Wolof / Head of Village Chiefs for Keur Moussa	4	4	Collaborate
Residents – Soune Wolof	4	2	Collaborate
Village Chief - Thiambokh	5	3	Collaborate
Residents - Thiambokh	4	2	Collaborate
Residents - Thiambokh Peulh	4	2	Collaborate
Village Chief - Nangane	4	2	Collaborate

Stakeholder	Level of Interest (1-5)	Level of Influence (1-5)	Level of Engagement
Residents - Nangane	4	2	Collaborate
Groups, Associations & Civil Society Stakeholders			
Women's Group – Soune Serer	3	2	Collaborate
Women's Groups (others)	3	1	Collaborate
Youth Group - Palal	5	3	Collaborate
Youth Groups (others)	5	3	Collaborate
Association of Herders of Keur Moussa	5	3	Collaborate
ENDA Tiers Monde	3	3	Involve

4. ENGAGEMENT APPROACH & MECHANISMS

4.1 Engagement to Date

In accordance with the recommendations of PS1, the Project will build on the channels of communication and engagement used during the risks and impacts identification process (PS1, GN94).

Stakeholder consultation was carried out to inform development of the original Project ESIA in 2019. Consultation involved relevant stakeholders from government and communities but focused primarily on engagement with elected and traditional community leaders. The consultation format used was primarily focus groups, though some larger public meetings were held. Records of consultation carried out for the original ESIA are included in the ESIA Report (December 2019).

In March 2021, a new consultation and data collection process was carried out to inform preparation of the updated ESIA in accordance with national regulations and the IFC Performance Standards. Engagement with local stakeholders was coordinated through the Mayor of Keur Moussa and then directly with the Village Chiefs of the communities in the Project's Aol. In each community, efforts were made to conduct focus group discussions or key informant interviews with the Village Chief and elders; farmers and herders; women; and youth.

Each interview and focus group discussion began with a presentation of the context for the consultation (i.e., preparation of the updated ESIA in accordance with lender requirements). Consultation was carried out in French with translation to local dialects (specifically Wolof and Serer). A semi-structured interview approach was used to allow participants to shape the discussion in accordance with their priorities and concerns. At the end of each discussion, participants were asked if they had any questions or additional comments they wanted to share related to the Project. Consultation was scheduled to allow adequate time for meaningful participation by all stakeholders; each focus group discussion took between 60 and 90 minutes. 108 people participated in the consultation process in March 2021 (see more details in the updated ESIA - 2021).

The 2021 data collection process also included a household survey to establish a socioeconomic baseline in four settlements that are likely to be significantly affected by the Project: Nangane, Palal Peulh, Thiambokh Peulh and the cultivated gardens located next to the pumping station of SEN'EAU (the national water agency). Where possible, the surveys were carried out only after the initial consultation was done so stakeholders were aware of the objectives of the data collection process and had a chance to ask questions or raise any concerns before surveyors arrived. In each case, the Village Chief was asked to inform local residents in advance of the surveyors' arrival to facilitate participation and ensure their availability.

Surveys were carried out by two experienced surveyors (one male, one female). Surveys were conducted with the Head of Household (or his/her representative in case of absence) in the presence of other household members, who were invited to supplement responses as needed. 49 households participated in the survey process, covering 226 household members (data was collected on household members 15 years and older).

Feedback provided through the consultation process is detailed in the updated ESIA (2021). Of note, the consultation process itself was a key point of concern raised by various stakeholders in March 2021. Specifically, stakeholders voiced frustration at being included in previous ESIA consultation processes by other project proponents in the area and then having no further contact with them. Stakeholders also noted concerns over other project proponents sharing information through commune-level government bodies or representatives, which failed to reach them at the village level. Stakeholders consistently requested that CIMAF maintain the same consultation approach utilized in March 2021 going forward: direct engagement at the village-level through focus group discussions. The Project's approach to stakeholder engagement must consider the legacy of mistrust that has been generated by previous project proponents in the area; commitments to regular engagement must be respected, communication

must be proactive and transparent, and the Project must be active in managing grievances and responding to community concerns.

4.2 Engagement Mechanisms

The Project team will include a Community Liaison Officer (CLO), who will be responsible for implementation of the SEP and potentially additional social management measures. The CLO's role and responsibilities are detailed in Section 7.1.

The Project will establish a multi-stakeholder monitoring committee (Comité de Suivi) involving local government and community stakeholders. The purpose of the committee will be to provide a central body through which information can be shared by and with the Project. The Monitoring Committee will also be involved in the design and implementation of Environmental, Health, Safety and Social (EHSS) management measures by the Project that could affect communities in the Aol, such as the local employment procedure and measures to control settlement patterns of migrants.

The following considerations for the Monitoring Committee will be confirmed through consultation with relevant external stakeholders and detailed in the final version of the SEP. Decisions will be captured in Terms of Reference (ToRs) for the Monitoring Committee, which will be signed by all members at the first committee meeting.

- **Committee members:** At a minimum, the committee must include one representative of women, one representative of youth, and one representative of Peulh communities from the Aol. The CLO will participate in all committee meetings and be responsible to ensure all committee members are able to participate in a meaningful manner.
- **Mandate:** A clear mandate will be set for the Monitoring Committee, defining its objectives, activities and the issues it will address. At a minimum, the committee will be responsible for sharing information between the Project and communities within the Aol.
- **Reporting:** It is recommended that the CLO be responsible for preparing meeting reports, which will be shared with and subsequently approved by committee members at each subsequent meeting.
- **Meeting frequency:** It is recommended the committee meet monthly or bi-monthly during the construction phase and less frequently during operations. Meetings can also be convened on an ad hoc basis as needed.
- **Meeting costs:** It is expected that a meeting space will be provided by the commune at no cost, however, the payment of per diems or transportation costs for committee members will be determined by the Project in advance of the first committee meeting.

In addition to engagement with the Monitoring Committee, the Project's will utilize the following mechanisms as part of its engagement process, building on the approach taken during the ESIA update in March 2021.

- **Focus Groups:** These are small, facilitated discussions with a specific group of stakeholders that foster full participation by all attendees. In the Project context, focus groups will often be organized by age, gender, or vocation. Focus groups will be held in quiet venues where outside disruptions can be minimized and confidentiality can be maintained. Where possible, focus groups will be limited to 10 participants (to enable full participation by all) and not exceed 90 minutes (to keep the discussion focused and minimize the demand on participants' time).

Focus groups will be convened on an as needed basis; at a minimum, focus groups with the Village Chief and elders, women, youth and herders in each community within the Aol (grouped as appropriate) will be held biannually during construction and annually during operations.

- **Key Informant Interviews:** These are one-on-one interviews with key stakeholders selected for their knowledge of, interest in, or influence over a certain topic related to the Project.

Interviews will be conducted using a semi-structured approach so critical topics are addressed but the discussion can also evolve based on the participant's input. Key informant interviews will be held in a quiet location where the participant feels comfortable and confidentiality can be assured. Key informant interviews will be organized on an as needed basis; at a minimum, the Project will meet with local government authorities (including the Prefect, Sub-Prefect and Mayor of Keur Moussa) annually during construction and operations.

In addition to the mechanisms above, the Project may also use the following for broader communication of information:

- **Public forum:** A public forum can be convened when the Project has information to communicate to a large audience. The forum will typically be convened by a government representative (such as the Prefect, Sub-Prefect or Mayor) at the Project's request. Following a welcome from the convenor, the Project representative(s) will typically be given the opportunity make a presentation and/or share remarks. An open discussion or question and answer session with attendees will follow. Given the tendency for public forums to be dominated by elected leaders and the most vocal attendees, it is not an appropriate mechanism to ensure meaningful participation of all stakeholder groups but can be an effective venue for communication and high-level engagement. Public forums should be held at a convenient time and location for the majority of attendees and promoted well in advance using public communication channels. Public forums will be convened quarterly during the construction phase with the venue alternating between the Commune Office of Keur Moussa and the village of Soune Serere. Public forums will be convened as needed thereafter, to be determined by the CLO.
- **Media and public notices:** The Project will utilize media (such as radio, newspapers, social media, etc.) as well as public notice boards to share information during the construction and operations phases. Information to be shared through public communication channels are likely to include notifications of employment or procurement opportunities, as well as announcements of public forums. The use of media and notice boards can help the Project to reach stakeholders it may otherwise not engage with directly, but this mechanism does not constitute meaningful engagement on its own.

For all in-person engagement, the Project will prepare an attendees list (to be signed by all participants) and take notes and photos (if appropriate) of the session. A meeting report (or Procès Verbal) will be prepared by the CLO for each engagement session, clearly identifying any commitments made by the Project and/or any follow-up actions agreed to by the attendees. All engagement will be recorded in the Project's EHSS database, noting the following information at a minimum:

- Date;
- Location;
- Number of participants;
- Names of participants (not required for public forums);
- Topics addressed;
- Summary of discussion / feedback received; and
- Commitments made / follow-up actions.

4.3 Vulnerable Persons and Groups

As per the requirements of PS1, the Project is required to identify individuals and groups that may be directly and differentially or disproportionately affected because of their disadvantaged or vulnerable status. This status may stem from "an individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status" (PS1, para.12).

In accordance with the requirements of PS1, the Project must consider factors including gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resource, when assessing vulnerability.

The updated ESIA (2021) identified two potentially vulnerable groups:

- **Women:** Gender equality in Senegal is hampered as a result of a traditional patriarchal culture and women's continued exclusion from formal education, governance structures, decision-making bodies, and formalized economic opportunities. Women in rural areas are often unable to own land. Their economic activities are frequently impeded due to their domestic burden. These challenges were consistently reported by women consulted in March 2021, many of whom noted that they had not been directly involved in or received much (if any) information from village or elected leaders regarding the original ESIA carried out for the Project.
- **Peulh communities:** Traditionally, Peulh communities in Senegal were largely nomadic, traveling with their livestock along established migration routes in accordance with the seasons. Conflict arose along these routes between local residents and Peulh herders along who cut trees or branches to feed their livestock or whose livestock entered agricultural fields and destroyed crops. This in turn led to mistrust and prejudice against the Peulh in many cases. In recent years, Peulh communities who have been able to access consistent sources of fodder for livestock have built semi-permanent or permanent structures and live in the same location year-round, which is the case for the three Peulh communities in the Project's Aol: Nangane, Thiambokh Peulh and Palal Peulh. Peulh community members surveyed in March 2021 reported grazing their livestock exclusively in the Classified Forest and many rely on pastoralism as their sole livelihood activity. No inter-community conflict or security issues were reported during the March 2021 consultation, however, Peulh hamlets were not necessarily represented among village leadership (i.e., Village Chief and elders) and special arrangements had to be made to ensure their participation in the consultation process.

The following considerations will be given to planning and implementation of the engagement mechanisms outlined in Section 4.2 in order to enable the meaningful participation of women and Peulh communities in the Project's engagement process:

- Key content of the draft SEP will be validated with representatives of the vulnerable groups prior to finalization;
- Representatives of the vulnerable groups will be included as members of the Monitoring Committee and will be supported by the CLO to enable their meaningful participation in the committee's activities;
- Representatives of the vulnerable groups will be proactively informed directly by the CLO of all in-person engagement sessions in which they may want to participate;
- Members of the vulnerable groups will be called on during in-person engagement sessions by the CLO and invited to provide their input;
- Separate focus groups will be organized with vulnerable groups on any issues that could affect them, regardless of whether members of those groups also participate in other engagement sessions on the same topics;
- Key informant interviews will be conducted with representatives of vulnerable groups on issues that could affect them to understand the potential level of significance of the issue and develop an appropriate approach for engagement with the broader group if necessary; and
- Leaders within vulnerable groups will be given grievance forms and contact information for the CLO so they can support their community members in raising questions or registering complaints with the Project.

5. GRIEVANCE MANAGEMENT SYSTEM

According to the IFC's Good Practice Note on Addressing Grievances from Project-Affected Communities (2009), a grievance is a concern or complaint raised by an individual or a group within communities affected by company operations. PS1 requires a formal mechanism for receiving and resolving community grievances be set up. A Grievance Management System (GMS) is the mechanism through which a project receives and addresses concerns raised by stakeholders and is a critical part of effective stakeholder engagement.

5.1 Principles

The United Nations Guiding Principles on Business and Human Rights (2011) outline the following effectiveness criteria for non-judicial grievance mechanisms. The Guiding Principles, which have become a standard for best practice across numerous industries, state that a grievance mechanism should be:

- **Legitimate:** encourages trust by implementing a fair and accountable process;
- **Accessible:** stakeholders are aware of the mechanism and assistance is provided to those who face barriers to participation in the process;
- **Predictable:** the procedure for the review and the proposed solution to a valid grievance are clear and consistent;
- **Equitable:** all affected parties have access to the mechanism and can engage in the process in a fair, informed, and respectful way;
- **Transparent:** complete information is provided regularly and proactively to build confidence in the effectiveness of the mechanism;
- **Rights-compatible:** the procedure operates in accordance with internationally recognized human rights; and
- **A source of continuous learning:** opportunities to improve both the mechanism and practices that mitigate future grievances are continuously identified.

The Guiding Principles also state that operational-level mechanisms should be based on engagement and dialogue, both in their design and as the means to address and resolve grievances. The design of the GMS will be validated with relevant external stakeholders and updated accordingly in the final SEP. This validation will include a review of the access points, format, timelines, and reporting mechanisms for grievances to ensure the system aligns with the principles above. Validation and finalization of the SEP will be completed by the Project prior to the start of construction.

5.2 Approach

As noted above, a key element to a functional GMS is ensuring broad awareness of its existence and how to access it. The Project will utilize the engagement mechanisms outlined in Section 4.2 – including media and public notices - to broadly disseminate information about the GMS prior to the start of construction. The GMS will be referenced at the start and close of all in-person engagement sessions during the construction phase to build stakeholders' familiarity with it and ensure it is understood as one way through which stakeholders can raise concerns. During the operations phase, the CLO will continue to encourage stakeholders to use the grievance mechanism as needed.

When a grievance is raised during in-person engagement, the CLO may be able to resolve it on the spot. Nonetheless, the complainant should be asked if he/she would like to register a formal grievance. Regardless of his/her answer, the CLO will record the grievance in the Project's EHSS database so that the subject is noted and any recurrent issues can be identified and managed proactively.

5.3 Procedure

The procedure for the receipt and resolution of grievances, along with associated timelines, is presented below. This procedure will be validated with relevant external stakeholders prior to being finalized.

1. **Registration:** Complainants can file grievances verbally with the CLO or in writing. The CLO will have grievance forms with him/her at all times; all Project personnel and contractors will have the CLO's contact information and know to direct any complainants directly to him/her. Grievance forms will also be available at various points in the Project's Aol (including with all Village Chiefs, at the office of the Mayor and Sub-Prefect, and with leaders of vulnerable groups). The form can be completed by the complainant directly or by his/her representative (see Annex A for a sample grievance form to be replaced in the final SEP with the Project's grievance form in French, note verbal grievances can be lodged in local languages as needed).

Once a grievance form is completed, the CLO will collect it from the complainant or his/her representative and record the information in the grievance register within the Project's EHSS database. The subject of the grievance should be noted to facilitate monitoring (e.g., dust, noise, water, recruitment, traffic, etc.). See Annex B for a sample grievance registry. The grievance will be registered within 24 hours of receipt of the grievance form. Grievances can be registered anonymously upon request.

2. **Notification:** Within 24 hours of the registration of a grievance, the complainant will be notified to confirm his/her grievance has been received. Notification will be done by phone or in person by the CLO and the grievance register will be updated accordingly.
3. **Validation:** Within 48 hours of notification, the grievance will be reviewed by the CLO to assess its validity. Valid grievances are those that meet all of the following criteria:
 - Filed by a stakeholder of the Project;
 - Related to a direct or indirect impact of the Project; and
 - Related to the activities of CIMAFA or any of its contractors, subcontractors or personnel.

The legitimacy of the grievance is not being assessed at this stage; validation confirms only that the subject of the grievance is related to the Project. Note that requests for employment or social investment / community development support are not considered grievances; they will be addressed by the CLO but will not be recorded in the grievance register.

If a grievance is deemed to be invalid, the CLO will inform the complainant and explain the reasons why in a written letter (with a verbal explanation provided if the complainant cannot read or write or in any cases deemed by the CLO to require further explanation). If another mechanism is available to address the complainant's concern, this information will be provided by the CLO.

If the grievance is deemed to be valid, the CLO will inform the complainant and the process will advance to investigation. The CLO will update the grievance register accordingly.

4. **Investigation:** The CLO will investigate all valid grievances through consultation with the complainant and the relevant Project personnel, contractors or sub-contractors. The scope of the investigation will include a review of the subject of the grievance and consultation with relevant internal and external parties to determine the appropriate resolution. Every effort will be made to resolve grievances swiftly, however depending on the complexity of the subject of the grievance, the investigation period may extend up to 30 days. The CLO will update the grievance registry with the results of the investigation.
5. **Resolution:** Following completion of the investigation, the CLO will inform the complainant in writing of the proposed resolution (with a verbal explanation provided if the complainant cannot read or write or in any cases deemed by the CLO to require further explanation).

If the complainant accepts the solution, the agreed-upon measures will be carried out, the CLO will have the complainant sign a close-out statement, and the CLO will update the grievance registry, marking the grievance as closed.

If the complainant does not accept the proposed resolution, the grievance will be referred to the Monitoring Committee (see Section 4.2), which will act as a third-party mediation body. The committee will conduct its own investigation over another 30-day period and propose a new resolution.

The Monitoring Committee will be convened for involvement in the grievance resolution process as needed. Notes of its discussion and decisions will be maintained by the CLO. When a solution is proposed by the committee, the CLO will notify the complainant. If the complainant accepts the solution, the agreed-upon measures will be carried out, the CLO will have the complainant sign a close-out statement, and the CLO will update the grievance registry, marking the grievance as closed.

If the complainant does not accept the resolution proposed by the committee, the complainant will be reminded by the CLO of his/ her right under Senegalese law to take the matter to the formal justice system. The complainant will also be made aware of any other available third-party mediation or advocacy services he/she may want to engage. The CLO will ask the complainant to sign a statement acknowledging that the grievance was not resolved. The grievance registry will be updated, marking the grievance as unresolved.

The steps in the grievance management procedure outlined above are presented in the following figure.

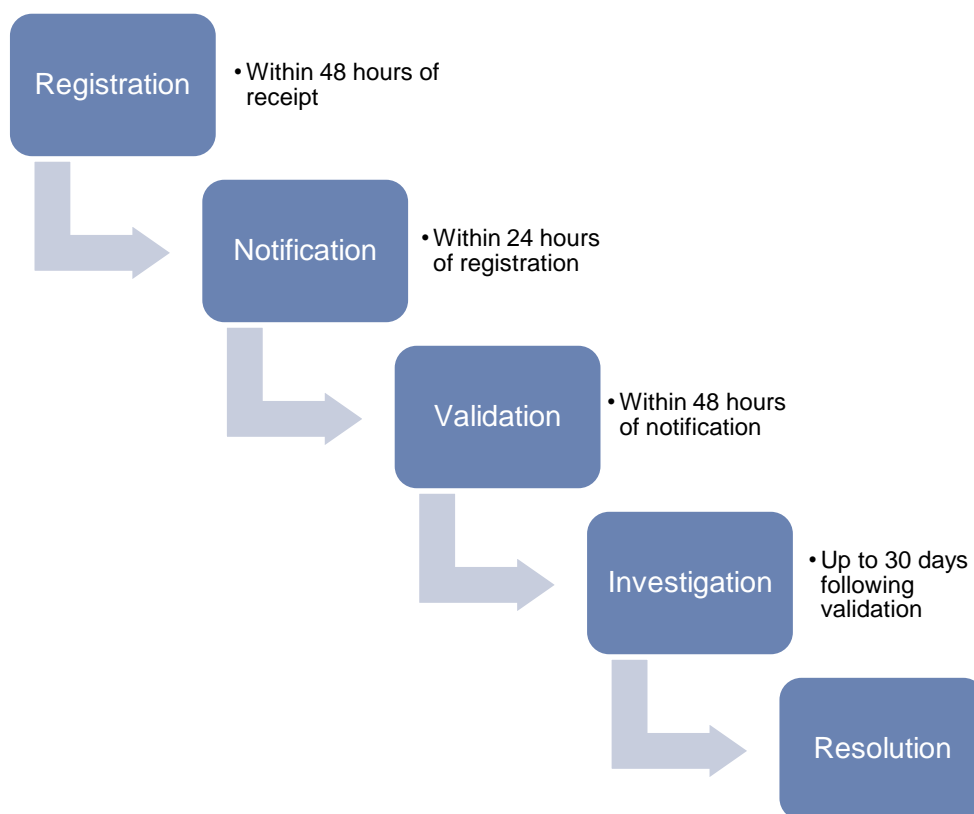


Figure 5-1 Grievance Management Procedure

5.4 Reporting

During the construction phase, a weekly internal EHSS report will be prepared by the Project and will include the following information from the grievance registry for both the reporting period and the total to date:

- Number of grievances registered;
- Subject of grievances registered;
- Number of grievances referred to the Monitoring Committee;
- Number of grievances resolved;
- Average number of days (from registration to close-out) for grievances resolved; and
- Number of grievances unresolved and reasons why.

All grievance data should be disaggregated by category to allow identification of recurrent issues.

During the operations phase, the internal EHSS report will be prepared monthly and will include the same information from the grievance registry. An annual report will be prepared by the CLO presenting the activities, challenges and outcomes of the engagement process, including the GMS.

Information on grievances will be reported externally as per the procedures described in Section 6.

6. MONITORING AND REPORTING

Monitoring of the engagement process will allow the Project to confirm it is following through on the commitments it has made and inform any adjustments to the engagement approach and mechanisms as needed. Monitoring will involve an analysis of the engagement and grievance data entered into the EHSS database (see Section 4.2 and 5.4) and reporting to both internal and external stakeholders.

During the construction phase, an internal EHSS report will be prepared weekly that will include data on stakeholder engagement and grievance management. During the operations phase, the internal EHSS report will be prepared monthly. In addition to grievance data (see Section 5.4), the following engagement indicators will be included in the EHSS report at a minimum:

- Number of engagement sessions (Monitoring Committee meetings, focus groups, key informant interviews, public forums, etc.);
- Number of participants in engagement sessions;
- Percentage of participants from identified vulnerable groups; and
- Key issues addressed during engagement sessions.

In addition, the CLO will flag in the EHSS report any issues emerging from the engagement process of which the broader Project team should be aware or that may require coordination among team members to address. The CLO will prepare an annual report during the construction and operations phases presenting the activities, challenges and outcomes of the engagement process, including the GMS.

External reporting on stakeholder engagement will be carried out by the CLO through the Monitoring Committee. The frequency, format and content of external monitoring reports will be determined through consultation with the committee and specified in its TORs (see Section 4.2). This information will be presented in the final version of the SEP.

In accordance with the Monitoring Committee's mandate, it will be responsible for disseminating information shared through engagement reporting with the broader population in the Project's AoI. However, the CLO will also provide reports on the engagement process directly with identified vulnerable groups as appropriate (see Section 4.3).

7. IMPLEMENTATION

7.1 Roles and Responsibilities

The finalization and implementation of the SEP will be undertaken by the Project's CLO. This role should be filled by a qualified practitioner who has experience in the design and management of stakeholder engagement programs for the private sector in Senegal. He/she should be hired by the Project to work full-time during the construction phase; his/her responsibilities may be reduced during the operations phase depending on the strength of the Project's relationship with local stakeholders and the stability of its social license to operate.

The CLO's responsibilities will include the following activities at a minimum:

- Finalization of the SEP, including validation of engagement mechanisms, the grievance management procedure, and external reporting process;
- Input into the design of the EHSS database to ensure information on engagement and grievances is captured and formatted for monitoring and reporting;
- Coordination and roll-out of the engagement mechanisms defined in the final SEP, including support for the Monitoring Committee (including verification of their communication of information to broader stakeholders) and specific measures to ensure meaningful participation by vulnerable persons and groups;
- Data management, including notetaking during engagement sessions, preparation of meeting reports, entry of data into the EHSS database, and preparation of internal and external reports;
- Implementation and monitoring of the GMS, including registering and resolving grievances, as well as the identification of any recurrent issues or trends in stakeholder complaints;
- Periodic review of stakeholder mapping with relevant internal stakeholders and update of the stakeholder register and SEP accordingly; and
- Reporting to internal and external stakeholders, including other members of the Project team, CIMAF management, and lenders.

As needed, the CLO will work closely with other members of the Project team and contractors who will have a role in or provide input to the engagement and grievance management processes.

7.2 Timeline

The SEP must be finalized prior to the start of construction. This process will involve consultation with key external stakeholders to validate the SEP overall and to confirm the following specifically:

- TORs for the Monitoring Committee;
- Broader engagement mechanisms, including measures proposed for vulnerable groups;
- Grievance management procedure, including access points and timelines; and
- Content, format and timeline for external reporting on engagement.

The final SEP will define the frequency for meetings of the Monitoring Committee as well as monitoring and reporting schedules. That said, the following timelines should be respected at a minimum:

- The first Monitoring Committee meeting (during which its TORs will be signed) will be held prior to the start of construction;
- Monthly or bi-monthly meetings of the Monitoring Committee will be held during the construction phase - the frequency may be reduced during operations (as determined by the Committee);

- At least two public forums (one at the Commune Office of Keur Moussa and another in the village of Soune Serere to ensure accessibility for residents from across the Project's Aol) will be convened prior to the start of construction to present and discuss issues with particular relevance for local residents (e.g., construction timeline, community health and safety measures, environmental controls, local employment procedure, etc.), as well as the Project's engagement process and GMS;
- Focus groups will be organized in each community in the Project's Aol at the start of the construction phase for the Village Chief and elders, farmers and herders, women, and youth to ensure they are aware of relevant social management plans, the engagement process and the GMS and biannually thereafter for the duration of the construction phase (to shift to annually during operations);
- At least one key informant interviews with the Prefect, Sub-Prefect and Mayor of Keur Moussa will be held per year during the construction phase (to continue at the same frequency during operations); and
- Quarterly public forums will be convened (with the venue alternating between the Commune Office of Keur Moussa and the village of Soune Serere) during the construction phase – the frequency may be reduced to bi-annual or annual forums during the operations phase (as determined by the CLO).

Periodic engagement will be carried out by the CLO using the mechanisms described in Section 4.2 throughout the construction and operations phases. Meetings of the Monitoring Committee will occur at regular intervals; additional engagement will be scheduled according to need as determined by the CLO or as requested by stakeholders.

7.3 Resources

Costs associated with stakeholder engagement are expected to include:

- **Compensation:** the CLO role is expected to be filled by a Project employee, though it could potentially be assigned to a contractor provided he/she has the necessary qualifications and availability;
- **Transportation:** the CLO role requires the ability to meet with external stakeholders regularly and with limited advance notice in some cases, this means he/she will need access to a vehicle at all times;
- **Technology:** the CLO role requires a dedicated mobile phone (the CLO's personal phone should not be used as the phone number should not change if he/she leaves the Project), the use of a computer with access to the Project's EHSS database, a projector to be used for visual aids during engagement sessions, and access to a printer for hardcopy materials; and
- **Meeting costs:** it is expected that meeting venues will be provided by the commune or villages at no costs, however, per diems and/or transportation costs for Monitoring Committee members may need to be covered (to be defined in the committee's TORs).

ANNEX A SAMPLE GRIEVANCE FORM

PROJECT GRIEVANCE FORM	
DATE:	
NAME OF COMPLAINANT:	
ID NUMBER:	
TELEPHONE:	
VILLAGE OF RESIDENCE:	
SUBJECT OF GRIEVANCE:	
DESCRIPTION OF GRIEVANCE:	
COMPLAINANT'S DESIRED RESOLUTION:	
SIGNATURE OF COMPLAINANT:	
NAME OF PROJECT REPRESENTATIVE RECEIVING GRIEVANCE:	
SIGNATURE OF PROJECT REPRESENTATIVE RECEIVING GRIEVANCE:	

ANNEX B SAMPLE GRIEVANCE REGISTRY

Date on Grievance Form	10.06.2021
Complainant Name	Mamadou Ba
Complainant ID No.	1975078415
Complainant Tel.	+221 77 874 8799
Complainant Village of Residence	Palal Peulh
Subject of Grievance	Traffic incident
Grievance Category	Traffic
Description of Grievance	Complainant says one of his cows was struck by a truck on the access road between the N2 and the Project site and has since died
Name of Project Rep Received Grievance	Fatou Touré
Date Grievance Entered into Registry	11.06.2021
Date of Notification	12.06.2021
Valid (Y/N)	Yes
Date Complainant Informed of Validity	14.06.2021
Investigation Completed (Y/N)	Yes
Investigation Results	Confirmed a cow was struck on 01.06.2021 by a truck driven by a Project contractor (incident report filled out). Confirmed Mamadou Ba is a herder and resident of Palal Peulh. He reported the incident to the Village Chief of Palal Peulh on 02.06.2021.
Description of Resolution Proposed	Compensation for cow has been proposed at 200,000 CFCA
Date Resolution Proposed to Complainant	30.06.2021
Resolution Accepted (Y/N)	No
Referred to Monitoring Committee (Y/N)	Yes
Description of Resolution Proposed by Committee	Committee confirmed the deceased cow was a full-grown male and has proposed compensation of 400,000 FCFA

Date Committee Resolution Proposed to Complainant	14.07.2021
Committee's Resolution Accepted (Y/N)	Yes
Date Grievance Closed	15.07.2021
Closure Statement Signed by Complainant (Y/N)	Yes

ANNEX C CONSULTATION RECORD TEMPLATE

Date of Meeting:		
Location of Meeting:		
Participants (Name / Phone No.):		
Project Representative(s) Present:		
Topics Discussed:		
Commitments / Agreements:		
Action Items and Deadlines:		
Notes:		
Photos:		
Consulted Record Prepared By: (Name / Date)		

ANNEX D SAMPLE STAKEHOLDER REGISTRY

IDENTIFICATION						ANALYSIS		ENGAGEMENT		
Name	Phone No.	Village of Residence	Title / Vocation	Age	Gender	Interest	Influence	Date of Last Meeting	Topics of Interest	Grievance to Date
Ba, Fatoumata	765479852	Soune Serer	Head of Women's Asc.	37	Female	3	2	17 April 2021	Women's economic development	0
Diallo, Abdourahim	775148745	Palal	Village Chief	43	Male	4	3	5 May 2021	Traffic, dust	1
Diao, Mamadou	760145791	Thiambokh Peulh	President – Asc. of Herders	30	Male	4	3	4 March 2021	Access to grazing land, livelihood restoration	2
Diop, Baboucar	778784215	Thiambokh	Elder / Farmer	52	Male	3	2	15 March 2021	Dust, access to water	0
Sen, Ndiaye	773101587	Pout	Manager – Enda Tiers Monde	26	Female	4	3	22 April 2021	Women's economic development, livelihood restoration	0

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