

ZAMBIA - TANZANIA INTERCONNECTOR PROJECT

STAKEHOLDER ENGAGEMENT PLAN



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ABBREVIATIONS

ESMP Environment and Social Management Plan

ESF Environment and Social Framework

E&S Environmental and Social

ESIA Environmental Social Impact Assessment

GRM Grievance Redress Mechanism

NGO(s) Non-Government Organization(s)

PAP Project Affected Person

PIU Project Implementation Unit

RAP Resettlement Action Plan

SEP Stakeholder Engagement Plan

SEA/SH Sexual Exploitation and Abuse/Sexual Harassment

ZEMA Zambia Environmental Management Agency

ZTIP Zambia - Tanzania Interconnector Project

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1. Introduction/Project Description

The RETRADE Platform is the WB response to support countries in the Eastern and Southern African Region in enhancing energy security, resilience, and a transition toward a low-carbon energy sector. In the Southern Africa region, the RETRADE platform will be implemented through a horizontal Multi-Phase Programmatic Approach (MPA), consisting of three phases namely: **Phase 1** comprising two components including investments in the Tanzania Zambia interconnector; **Phase 2**, which will finance the Angola-Namibia Interconnection Project (ANNA) in the Western corridor, and **Phase 3**, which will support the development of one additional high-benefit interconnection in the Central or Western corridor.

Phase 1 of the RETRADE MPA project will have the following key components:

- i. Component A: Regional Soft Infrastructure Interventions: This will be implemented by the Southern African Power Pool Coordination Centre (SAPP CC) and will finance a wide range of regional technical assistance and capacity building activities. This component has two sub-components viz: Subcomponent A1: Enhancement of the Regional Electricity Trade Enabling Environment; and Sub-component A2: Establishment and operationalization of SAPP's Regional Transmission Infrastructure Financing Facility (RTIFF).
- **ii. Component B: Zambia-Tanzania Interconnection:** This will be implemented by ZESCO to finance the Zambian portion of the Zambia-Tanzania Interconnector Project (ZTIP), through two sub-components namely Sub-component B1: Zambia Transmission Lines and Associated Substations; and Sub-component B2: Technical Assistance and Project Management Support.

The ZTIP marks a historic link between the Southern African Power Pool (SAPP) and the Eastern African Power Pool (EAPP), connecting 12-member countries in SAPP and 13-member countries in EAPP. Serving as a pivotal connection, this interconnector is poised to enable power trading between nations spanning from South Africa to Libya.

The ZTIP comprises the following components: construction of 373km of 330kV single-circuit transmission line between the Pensulo and Kasama Substations; 230km of 330kV double-circuit transmission line from Kasama to Nakonde; 330/66kV Substation at Nakonde; 15km of 330kV double-circuit transmission line from Nakonde to the Zambia – Tanzania boarder; 12 km of 132 kV double circuit from Nakonde to Isoka (loop in and out of 66 kV Isoka - Nakonde line). The larger component of project relates to the construction and reinforcement of transmission lines and substations within Zambia that will enable power to be transmitted from the border between Zambia and Tanzania to the main transmission system in Zambia that links Zambia to the rest of the SAPP region.

The ZTIP is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.





2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which ZESCO will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

As agreed between the World Bank and ZESCO this SEP can be revised from time to time during the implementation of the project to reflect adaptive management, respond to implementation changes, adapt to unforeseen circumstances, and respond to the assessment of activities implementation's performance. In such circumstances, ZESCO will agree with the Bank on the changes to be made and will update the SEP to reflect such changes. Agreement on changes to the SEP will be documented through the exchange of letters signed between the Bank and the ZESCO, and ZESCO will promptly disclose the updated SEP.

3. Stakeholder identification and analysis per project component

3.1 Principles for Stakeholder Engagement

To meet best practice approaches, the ZTIP project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- Informed participation and feedback: Information will be provided to and widely
 distributed among all stakeholders in an appropriate format; opportunities are provided
 for communicating stakeholder feedback, and for analyzing and addressing comments
 and concerns.
- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders will always be encouraged to be involved in the consultation process, and equal access to information shall be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

3.2 Affected Parties

Affected Parties (APs) are persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who

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need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. APs in this context are mostly people who will need to be consulted on the works and activities to be undertaken under the ZTIP in areas along the line route and Right of Way (ROW) including Serenje, Mpika, Kasama, Isoka, Nakonde and surrounding areas. These APs include the following:

- The local community within the vicinity of the ZTIP work area;
- **Residents**, business entities, and individual entrepreneurs in the ZTIP area that can benefit from the employment, training and business opportunities;
- Traditional leaders in the project area including Paramount Chief Chitimukulu, Senior Chief Mwamba, Senior Chieftainess Nawaitwika, Chief Nkolemfumu, Chief Mpumba, Chieftainess Chanda Mukulu, Chief Chikwanda, Chief Mailo, Chief Kabamba, Chief Mpepo, and Chief Nakasa and their respective Headmen and Headwoman.
- Local authorities within the project area including Serenje District Council, Mpika
 District Council, Kasama Municipal Council, Nakonde District Council, Isoka District
 Council and other respective district and provincial administration authorities;
- Other community-based groups and non-governmental organisations (NGOs) that represent residents and other local interest groups directly affected by the project.

3.3 Other Interested Parties

Other Interested Parties (OIPs) include individuals, groups or entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. These OIPs include:

- Government Ministries including Ministry of Energy, Ministry of Green Economy and Environment, Ministry of Lands and Natural Resources, Ministry of Labour and Social Security, and Ministry of Local Government and Rural Development;
- Regulatory authorities at national and provincial level including Zambia Environmental Management Agency (ZEMA), Department of National Parks and Wildlife, Forestry Department, and Factories Department;
- Local authorities within the project area including Serenje District Council, Mpika District Council, Kasama Municipal Council, Nakonde District Council, Isoka District Council and other respective district and provincial administration authorities;
- Non-governmental organisations including agencies such as Birdwatch International Zambia, and World Wildlife Fund (WWF);
- Mass media and associated interest groups, including local, regional and national print and broadcast media, digital/web-based entities, and their associations.

3.4 Disadvantaged / vulnerable individuals or groups

Vulnerable and marginalized Groups (VMGs) are persons who may be disproportionately impacted or further disadvantaged by the Project(s) compared with any other groups due

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to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes associated with the project. This is a segment of the population has some specific characteristics that places them at higher risk of falling into poverty or being excluded from benefits of the Project compared to others living in areas or receiving services targeted by a project.

The VMGs for the ZTIP may include but are not limited to the following:

- **The elderly:** These may be persons above the age of 65 years, who may have limited ability to move long distances. For these, engagements should be held as close to their respective local communities as possible.
- Persons with Disabilities and their caretakers: These may have audio, visual, or
 mobility limitations. In this case, documents prints would need to be large and clear;
 use of audio-visual aides would need to be employed; hosting of meetings in
 wheelchair or disability accessible venues would be considered; and the use of signlanguage instructor and language interpreter would be implemented.
- Poor/low-income families/households: The voice of this group in community
 meetings often carries less weight and may not be considered. Holding separate focus
 group meetings will make it easier for this group to express their ideas and any
 concerns.
- Women and child headed households: These may have limited time because they
 have to take on many roles at the same time. Adjustment of timing of meetings to
 avoid working time; and if possible, the project may arrange a facility such as care of
 a child or children while they participate in the meeting could be considered.
- Additional vulnerabilities may stem from a persons origin, tribal grouping, ethnicity, health condition, disadvantaged status in the community, or dependence on other individuals or natural resources.

Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related consultation and decision making so that their awareness of, input to, and buy-in of the overall process are commensurate to those of the other stakeholders. Vulnerable groups within the communities affected by the project will therefore be confirmed and consulted through dedicated means, as appropriate, to ensure that they are identified and meaningfully consulted.

3.5 Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

Stakeholder needs vary depending on a stakeholder's socio-economic status, locality, language and cultural factors and capacity. The needs of stakeholders will be discussed during stakeholder consultations, and the list in Table 1 will be updated as necessary.



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Table 1: Summary of Project Stakeholder Needs

Stakeholder group	Stakeholder	Key characteristics	Language needs	Preferred communication method(s)	Specific needs
Government Ministries, Departments, and Agencies	Ministries	Consists of relevant Ministries including Ministry of Energy, Ministry of Green Economy and Environment, Ministry of Lands and Natural Resources, Ministry of Labour and Social Security, and Ministry of Local Government and Rural Development etc.	English	Formal meetings Structured agendas Email communication. Telephone	Planned stakeholder engagements, information generation and dissemination. Regular formal and informal meetings
	Statutory Bodies and Government Departments	Composed of agencies that include Zambia Environmental Management Agency (ZEMA), Factories Department, Department of National Parks and Wildlife, Forestry Department etc.	English	Formal meetings Structured agendas Email communication Letters	Planned stakeholder engagements, information generation and dissemination. Regular formal and informal meetings.
		These form the local administrative structure in the various districts through which the ZTIP traverses. Local Authorities composed of various local administrative authorities along the project route in	English	Formal meetings Structured agendas Email communication Letters	Project roles and responsibilities, planned stakeholder engagements, information generation and dissemination.



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Stakeholder group	Stakeholder	Key characteristics	Language needs	Preferred communication method(s)	Specific needs
		Serenje, Mpika, Kasama, Mungwi, Mbala, Chinsali, Nakonde, Isoka, and other local government agencies			
Local Communities	The elderly, Persons with Disabilities and their caretakers, Poor/low-income families/households, Women and child headed households	Group of people directly affected by the project as they are within the ROW.	Local languages	Focus group meetings /discussions, Community consultations Site visits	Sensitization on ZTIP and its outcomes. Adjusting meeting arrangements to fit local culture and expectations.
	Traditional Leadership including Chiefs, Chieftainess', Headmen/Headwomen, and any other traditional leadership.	Project traverses through their area of traditional jurisdiction.	Local languages	Focus group meetings /discussions, Community consultations Site visits	Sensitization on ZTIP and its outcomes. Adjusting meeting arrangements to fit local culture and expectations
International partners	World Bank	Financiers of the project. Possess knowledge of E&S management.	English	Email, telephone calls, meetings (in person or virtual)	Project progress in relation to preparation, implementation, stakeholder engagements, joint control and management efforts, experience sharing, grievances received and how they are being handled and resolved,



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Stakeholder group	Stakeholder	Key characteristics	Language needs	Preferred communication method(s)	Specific needs
					Regular formal and informal meetings
	CoWater, CIG Zambia, FCDO	Financiers for the Environmental and Social (E&S) update of the ZTIP ESIA.	English	Email, telephone calls, meetings (in person or virtual)	Progress meetings regards timelines for ESIA update and funding.
	WSP	Consultant updating the ESIA, ESMP, and RAP for the ZTIP	English	Email, telephone calls, meetings (in person or virtual)	Progress meetings regards the updating of required E&S documents
Other interested organizations	Non-governmental organisations including agencies such as Birdwatch International Zambia, and World Wildlife Fund (WWF) etc. with an interest in the project	NGOs have an interest in the project as it may traverse areas of their interest such as wetlands or affect other aspects of their interest.	English	Formal meetings Structured agendas	Sensitization and consultation on ZTIP and its outcomes. Adjusting meeting arrangements to fit local culture and expectations
	Media	Mass media and associated interest groups, including local, regional and national print and broadcast media, digital/web-based entities, and their associations	English	Formal meetings Structured agendas	Sensitization and consultation on ZTIP and its outcomes. Adjusting meeting arrangements to fit local culture and expectations

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4. Stakeholder Engagement Program

4.1 Summary of Stakeholder Engagement Done During Project Preparation

Stakeholder consultations on the ZTIP commenced in 2016 during the ESIA study for the Kasama-Nakonde 330kV Transmission Line Project, which is part of the now existing ZTIP scope. Various consultation continued during the ESIA study for the ZTIP scope in 2020. The above stakeholder consultations occurred during the preparatory phases of the project, which stalled because of project financing gaps until 2024 following the launch of the RETRADE MPA Platform.

The key stakeholders consulted in this initial preparatory phase of the ZTIP include those individuals, communities, groups, and public-sector agencies and enterprises that will be affected by or have interest in the project activities. It is important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

Stakeholder engagement is still on-going and will be continual throughout the various stages of the project. Stakeholders have and will continue to be identified on a continual basis by identifying:

- **Identifying** various stakeholder categories that may be affected by, or be interested in, the Project;
- Identifying specific individuals, groups, and organizations within each of these categories taking into account:
- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over the Project's lifetime, and therefore the localities within which people and businesses could be affected.
- The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

4.2 Objectives of the Stakeholder Engagement Program and Communication Methods

The objective of this communication plan is to define the communication requirements for the Project and how information will be shared. Project communication will be structured and offered regularly but with the flexibility of responding to issues as they emerge. Broadly, stakeholder engagement for the ZTIP has been categorised into preparation, implementation and monitoring, and completion engagement activities. A variety of communication methods will be used to engage with stakeholders reflecting their level of

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authority, socio-economic context, and cultural and intellectual factors such as level of education and literacy.

4.3 Stakeholder Engagement Plan

The overall goal of this Stakeholder Engagement Plan (SEP) is to ensure a systematic, consistent, comprehensive and coordinated approach to stakeholder participation and communication throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and feedback mechanisms to be utilized.

The plan will guide timely engagement with key stakeholders as well as dissemination and increased access to relevant project information. The project will innovate ways for consultations to be effective and meaningful to project and stakeholder needs.

In addition to this SEP, ZESCO has developed an Environmental and Social Commitment Plan (ESCP) and will develop a Labor Management Procedure (LMP) which will be widely disseminated on the ZESCO and World Bank websites to ensure access to information about the environmental and social risks and respective mitigation measures.

4.4 Proposed Strategy for Information Disclosure

Electronic copies of the disclosure materials will be placed on the ZESCO, World Bank, and where necessary, ZEMA websites to allow easy access for all stakeholders. The disclosure materials will also be shared with the targeted stakeholders through email, and during project related meetings.

In addition to disclosure of the various project materials (ESCP, SEP, and LMP), formal channels will be put in place to register and document comments, suggestions and grievances from the public. The grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns in relation to the Project. Table 2 shows stakeholder engagement, consultation, and disclosure plan

4.5 Proposed Strategy for Consultation

ZESCO will conduct consultations with all identified stakeholders with the aim of creating awareness, improving access to information and receiving/giving feedback on project implementation. The communication channels highlighted above will play a key role in ensuring information flow between ZESCO and its stakeholders. Table 2 presents the stakeholder consultation plan.

4.6 Timelines

Stakeholder consultations/engagements will be conducted throughout the project lifecycle i.e. during project preparation, implementation, monitoring and completion stages.

E&S PIU staff will be trained on the World Bank ESF and related instruments such as the ESCP, SEP, LMP, and GRM before project effectiveness to increase their awareness and understanding to facilitate implementation, while monthly project monitoring reports on the ESHS performance and monthly project progress reports will be made available through the channels indicated in Table 2.



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Table 2: Stakeholder Engagement, Consultation and Disclosure Plan

Project Stage	Topic of Engagement/ Information to be Disclosed	Estimated Time / Frequency	Method Used	Target Stakeholders	Responsibilities
Project Preparation	Dissemination of project information, soliciting inputs from stakeholders, project scope and rationale, required E&S instruments (ESIA, ESMP, LMP, GRM, SEP, ESCP etc.)	Prior to project approval – during ESIA study, prior to ESIA approval	Stakeholder meetings, community information meetings, scoping, public hearings ESIA reports.	 All relevant project stakeholders: All PAPs, including vulnerable/disadvantaged groups & individuals, community. Local authorities/administration and traditional leaders in project area (Serenje, Mpika, Kasama, Mungwi, Nakonde) Statutory Bodies and Government Agencies inter alia ZEMA, Forestry Department, Department of Wildlife 	ZESCO
	Development, approval and disclosure of ESF requirements (ESCP, SEP, LMP), PPSD, Annual Workplan, E&S Specialist ToRs	Prior to disbursements of funds and project effectiveness.	, ,	World Bank	ZESCO
	Funding gaps for E&S instrument update by WSP	Prior and during E&S update before project effectiveness		CoWater,CIGZambia,FCDO,World Bank	ZESCO
	Progress on update of Project E&S	Bi-monthly during contract	Meetings, Workshops, Emails, Presentations	WSP,CoWater,CigZambia,World Bank	ZESCO



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Project Stage	Topic of Engagement/ Information to be Disclosed	Estimated Time / Frequency	Method Used	Target Stakeholders	Responsibilities
	Instruments - Updated ESIA, ESMP, and RAP				
	Project documents - ESCP, SEP, LMP, Updated ESIA, Updated RAP, Updated ESMP, H&S Plan, GRM, Annual Workplan	Within three months of project effectiveness	Physical meetings, Workshops, Emails, Presentations	 All project stakeholders as relevant to respective project document Implementing parties e.g. Supervising Engineer. 	ZESCO
Project Implementation	ESCP, SEP, LMP, ESMP, Project progress, E&S sub-plans, GRM for PAPs & workers	Within three months of project effectiveness, and monthly or quarterly thereafter as required.	Meetings, training on GRM for designated committee members, disclosure of written information (Print and Broadcast Media, Brochures, posters, flyers), website)	 Project Supervising Engineer General Community Other relevant APs and interested parties All stakeholders, including vulnerable/ disadvantaged groups & individual, 	ZESCO
	Project progress reports on project/contractor ESHS performance	1st report – within three months after start of project implementation / effectiveness and subsequent reports monthly.	Meetings, Reports	ZESCO PIU (PIU E&S Specialists)	Project Supervising Engineer



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Project Stage	Topic of Engagement/ Information to be Disclosed	Estimated Time / Frequency	Method Used	Target Stakeholders	Responsibilities
Monitoring	Monitoring on project E&S / ESHS instruments and sub- plans (ESCP, SEP, GRM, H&S Plan, LMP, ESMP) effective implementation.	Monitoring throughout project cycle on a monthly or quarterly basis, or dependent on project activities being implemented.	Field inspections, workshops, interviews,	 Project Supervising Engineer PAPs Community members within the vicinity of the project 	ZESCO
	Monitoring reports on project E&S / ESHS performance (the implementation of E&S sub-plans), satisfaction with engagement activities and GRM in a prompt and effective manner, E&S plans achieved, results and review/evaluation.	1st report – within three months after project implementation / effectiveness and subsequent reports monthly or quarterly depending on project risk classification	Email, meetings, reports	Project Supervising Engineer World Bank	ZESCO
Project Completion	Impact of project implementation on PAPs, project beneficiaries, E&S / ESHS plans achievement, lesson learnt sessions	Endline of the project	Focus group discussions, workshops, individual meetings,	All stakeholders	ZESCO

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4.7 Review of Comments

The ZESCO PIU will maintain open lines of communication with all stakeholders to encourage information flow-including feedback, understanding of the project and its key documents and to strengthen working relationships.

Comments from stakeholders will be gathered through email, social media, during meetings-both formal and informal, and included in periodic project reports as necessary. Response to the comments will be done directly to the individual(s) or through email, meetings or reports.

5. Resources and Responsibilities for Stakeholder Engagement Activities

5.1 Resources

The stakeholder consultation and disclosure activities for the ZTIP will be funded by the RETRADE Platform specific to Phase 1, Component B, sub-component B2 under Technical Assistance and Project Management Support. The budget estimate for the implementation of the SEP is USD 485,000 and is presented in Table 3. The SEP implementation success requires the appointment of personnel who will assume implementation and management responsibilities.

The ZESCO PIU on the ZTIP will oversee all stakeholder engagement activities through the appointment of a Social Specialist and Environmental Specialist, who will be responsible for coordinating SEP activities during the project implementation period.

5.2 Management Functions and Responsibilities

The ZESCO PIU will play a key role in the consultation processes through their interaction with the different stakeholders, and will have the following main tasks:

- Overall responsibility for day-to-day coordination and management of the project.
- Capacity building in critical areas, inter alia, GRM, ESMP, ESCP, LMP of the project to relevant project stakeholders.
- Implementation of the SEP, ESCP, GRM in accordance with all requirements.
- Program management and implementation of activities in accordance with agreements between the Government of Zambia and the World Bank.
- Overall project operation monitoring and evaluation.
- Project E&S operation reporting, including the periodic progress reports.
- Ensuring that operation resources are budgeted for and disbursed within the expenditure framework.
- Evaluating the performance of the ZTIP implementation.

The Project Manager will be the point of contact for all comments or questions about the project, with aspects regarding the SEP under the direct response of the Environmental and Social Specialists under the PIU.



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Table 3: Estimated Budget for Implementation of the SEP

No.	Required Resources	Quantity	Unit Cost	Estimated	Remarks
			in USD	Cost in USD	
	Stakeholder Engag				T =
1.	Periodic stakeholder engagement/consultations in project area - Local authorities/administration and	20	500	10,000	Engagement to be done once a quarter for a period of 5 years
	government agencies in Serenje, Mpika, Kasama, Mungwi, Nakonde - Traditional leaders along the project stretch in Serenje, Serenje, Mpika, Kasama, Mungwi, Nakonde - PAPs and communities within the project area.				
2.	Logistics and Travel to project area for stakeholder consultations	1	200.000	200,000	Lumpsum for a period of 5 years
	Material Production	n and Distri	bution / Med	lia Presence	period of 5 years
3.	Radio and Broadcasting	1	10,000	10,000	Lumpsum for a
3.	Community radio stations in project area National television on Zambia National Broadcasting Corporation (ZNBC)		10,000	10,000	period of 5 years
4.	Information materials development (brochures, leaflets, posters, other items)	1	5,000	5,000	Lumpsum for a period of 5 years
		nce Redress	Mechanism		
5.	Training for GRM Committee Members	2	5,000	50,000	Training to be done twice a year for a period of 5 years
6.	Training for Communities and project beneficiaries on GRM	1	100,000	100,000	Lumpsum for a period of 5 years
7.	Complaint registration logbook, suggestion boxes, etc., to be in: - Local ZESCO Offices - Local authority/administrative offices (Serenje, Mpika, Kasama, Mungwi, Nakonde)	1	10,000	10,000	Lumpsum for a period of 5 years
		g and Capa	city Building		
8.	Training and Capacity Building in E&S aspects including community Health and Safety	1	100,000	100,000	Lumpsum for a period of 5 years
ESTI	MATED TOTAL			485,000	

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6. Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner. The Project GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) or any reports made by PAPs.

The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level. The GRM will not impede affected persons access to the legal system. As such, at any time, the complainant may take an unresolved grievance to the appropriate legal or judicial authority as per the laws of the country.

6.1 Description of the GRM Process

The E&S Specialists under the ZESCO PIU will be assigned to follow up complaints related to the project. The complaints, to be filed, shall be related to the project components and/or to its implementation and management. The grievance resolution process will involve the following main steps:

- Receipt of grievances: anyone from the affected communities or believing they are
 affected by the Project can submit a grievance (written, verbal, telephone, etc. as
 appropriate for the complainant).
- **Registering the complaint:** the focal point, or GRM committee member, who received the complaint will use the GRM logbook to register the grievance.
- **Referral and examination of complaints:** a GRM Committee shall be established at each project implementation site (comprising of members from Project Implementation Teams, PAPs, elders, a representative from Women and Children Affairs office (for GBV issues), etc.) to examine the complaint, resolve it, or refer it.
- **Notifying the complainant:** the decision/solution/action by the grievance committee shall be communicated to the complainant as per the stipulated timeline.
- **Legal Redress:** where the complainant is unsatisfied with the outcome of the decision, they will have the right to appeal through the appropriate legal or judicial authority within their jurisdiction, and higher appeals where necessary.
- **Closing the complaint:** where the decision/solution of the complaint is accepted by the complainant (through the GRM committee or respective legal process), the complaint will be closed following the appropriate procedure.

All grievances and the process followed to their resolution shall be recorded and maintained in a grievance register for purposes of follow-up and analysis of types of grievances received. The Environmental and Social Specialists under the PIU will be responsible for the maintenance of this grievance register. The GRM management process is presented in Table 4



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Table 4: ZTIP GRM Management Process

Step	Description of Process	Time Frame	Responsibility
Establishment of Local GRM Structure	GRM Committees will be established at all project implementation sites/sub-project levels, or existing GRM Committees will be used.	Before project implementation	ZESCO PIU
	The GRM Committee will comprise members of the community, PAPs, Traditional Leaders, Women, Children, Project Personnel, and other relevant stakeholders. These will be the contact persons for receipt of grievances.		
Identification of grievance / Grievance Uptake	Grievances will be submitted via the following channels: Face-to-face (In-person) Short Message Service (SMS) Email Letters During public/community interaction In-person at local ZESCO Project offices At contractor work sites or camps Phone calls Any other convenient mechanism for PAPs, disadvantaged, vulnerable groups, etc.	To be recorded within 1 Day of identification. Process will be ongoing throughout project implementation.	`
Grievance sorting assessed and logged	Grievances received are assessed and recorded/logged into Grievance Register and categorised according to the following complaint types: Project delays Environmental concerns Social impacts Health and Safety Discrimination and harassment Land acquisition and resettlement Employment and labour relations Any other category not specified Grievances concerning SEAH/SH or GBV shall be treated as confidential. Only the nature of the complaint and the processing outcome should be	Within 3 Days of receipt of grievance	GRM Committee (local grievance focal points)
Grievance acknowledgment and follow-up	recorded. Acknowledgment of grievance to complainant through appropriate medium e.g. • Formal acknowledgement letter	Within 5 Days of receipt of grievance	GRM Committee (local grievance focal points)



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6.2 Handling of Sexual Exploitation and Abuse/Sexual Harassment (SEAH/SH) Complaints

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GRM shall have a different and sensitive approach to SEAH/SH related cases. It shall make use of the existing national referral pathway on GBV, SEAH/SH case management. Where such a case is reported to the GRM Committee, it should immediately be referred to the appropriate institutions for medical and/or psychological support, emergency accommodation, and any other necessary services. It should also be reported to the PIU Social Specialist who can advise on relevant service providers. Data on SEAH/SH cases should not be collected through the GRM unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints.

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Only the nature of the complaint (what the complainant says in her/his own words) and additional demographic data, such as age and gender, shall be collected in these instances.

7. Monitoring and Reporting

The monitoring and reporting of the implementation of the SEP will be done in accordance with the commitments and timelines indicated on the Environmental and Social Commitment Plan (ESCP) for the project.

7.1 Involvement of stakeholders in monitoring activities

The extent and mode of stakeholder monitoring with respect to environmental and social performance will be proportionate to the potential environmental and social risks and impacts of the project supported activities their effect on the various stakeholder interests.

The following Monitoring actions will be undertaken regarding stakeholder interests in line with the environmental and social performance of the project, which will include:

- Conducting stakeholder engagement in a consultative manner, in accordance with the SEP, and build upon the channels of communication and engagement as established with stakeholders.
- Collection of feedback from stakeholders on environment and social performance of the project, and on the implementation of the mitigation measures outlined in the ESCP on defined timeframe.
- Periodic reviews of compliance with requirements of the legal agreements, including the ESCP.
- Where appropriate, and as set out in this SEP, engaging stakeholders and third parties such as independent experts, local communities or nongovernmental organizations (NGOs), to complement or verify projects stakeholder monitoring information.

7.2 Reporting back to stakeholder groups

Engagement and consultation with stakeholders will be continual throughout the project. In reporting back, all stakeholders including the public, interested parties in the project areas including the community, local government agencies, local authorities, traditional leadership will continue to be engaged.

Specifically, the PIU will develop regular reports (monthly or quarterly) which are required by the World Bank. The reports will present all activities, including stakeholder engagement activities, for the period and summarize the issues.

The SEP will be periodically revised and updated as necessary to ensure that the information and the methods of engagement remain appropriate and effective in relation



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to the project context. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. The monthly/quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Specific mechanisms to report back to the stakeholders include meetings, newsletters, email updates, social media platforms and reports

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Annexes

- Annex 1: Template to capture minutes/records of consultation meetings
- Annex 2: Complaints Registration Form
- Annex 3: SEA/SH Registration and Referral Form
- Annex 4: Grievance Monitoring and Tracking (for non-SEA/SH Complaints)



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Annex 1: Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)



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Annex 2: Complaints Registration Form

1.	Complainant's Details: (Optional)
	Name (Dr / Mr / Mrs / Ms)
	ID Number
	Postal address
	Mobile
	Email
	County
	Age (in years):
2.	Are you requesting for confidentiality for the information? Yes No
3.	Is there any fear/ risk of retaliation or attack or victimization?
4.	Yes No Which institution or officer/person are you complaining about?
5.	Have you reported this matter to any other public institution/ public official? Yes No
6.	If yes, which one?
7.	Has this matter been the subject of court proceedings?
	Yes No
_	Please give a summary of your complaint and attach all supporting documents to indicate all the particulars of <i>what</i> happened, <i>where</i> it happened, <i>when</i> it ned and by <i>whom</i>]



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9.	What action would you want to be taken?	
Signat	ture	
Date _		



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Annex 3. SEA/SH Registration and Referral Form

Name of complainant:			Nati	Nationality:				
Address/Co	ontact D	Details:						
Position (if	applica	ıble):		Age:	Se	ex:		
Name of vi	ctim/su	rvivor (if diffe	erent fr	om complainant)	:			
Address/Co	ontact [Details:						
Age:			Sex:		Nationality:			-
Name (-			parents/legal				
Has survivo	or giver	consent for	comple	etion of this form?	YES: NO:			
		vor a benefici agency provid	-	ceiving any type o	of humanitaria	n ass	istance? (I	Name
Location of	allege	d incident (s):						
Date:			Time:					



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Physical and emotional state of the victim/survivor (Describe any cuts, bruises, lacerations, behaviour and mood, etc.):				
Witness' Name & Contact Information:				
Description of incident (Please use separate sheet of paper if necessary):				
Briefly describe service provided to survivor:				
Briefly describe if there will be need for medium and long-term victim assistance:				
Any other pertinent information provided during interview? (Including contact made with other organisations if any):				



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Signature/thumbprint signaling that the complainant been informed about organisations procedures for dealing with complaints:

Name of Accused Person (s):					Job title:			
Organisation		Accused	Pers	son	(s)	Works	for	
Address		of		Accus	sed		Person	
 Age:		Sex:						
Physical Descr	ription o	of Accused Pers	son:					
		continuing thre se explain any		•	e survivo	or, complain	ant, staff o	
Has any discip	olinary a	action been tak	en by th	e responsible	agency	? (Describe)	:	
Report Comple Position/Organ	-	: :		Date/Tim	e:			
Location:							_	
Date Rep	ort	forwarded						
		vant managem	nent stru	cture				
(Name/Positio	n/Signa	ature):						



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Annex 4: Grievance Monitoring and Tracking (for non-SEA/SH Complaints)

Category	Response
Case no.	
Date Claim Received	
Name of Person Receiving Complaint	
Where/how the complaint was received	
Name & contact details of complainant (if known)	
Type of Claim	
Add content of the claim (include all grievances, suggestions, inquiries)	
*please note if the complaint was related to the project. If not, note it here and refer complainant to PIU for further processing	
Was Receipt of Complaint Acknowledged to the Complainant?	
(Y/N – if yes, include date, method of communication & by whom)	
Expected Decision Date	
Decision Outcome	
(include names of participants and date of decision)	
Was Decision communicated to complainant? Y/N	
If yes, state when, by whom and via what method of communication	
Was the complainant satisfied with the decision? Y/N	
State the decision.	
If no, explain why and if known, will pursue appeals procedure.	
Any follow up action (and by whom, by what date)?	
They remove up action (and by whom, by what date):	