



**MINISTRY OF ENERGY AND  
MINERALS  
SOMALILAND**

**271.6KM, 400Kv, WAJAALE-  
HARGEISA-BERBERA  
ELECTRICITY  
TRANSMISSION LINE  
SOMALILAND**

**STAKEHOLDER  
ENGAGEMENT PLAN**

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## ACRONYMS

AM	Accountability Mechanism
AoI	Area of Influence
CSO	Civil Society Organizations
DRC	Democratic Republic of Congo
DRS	Dispute Resolution Service
EAPP	East Africa Power Pool
EEP	Ethiopia Electric Power
EHS	Environmental Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HOA	Horn of Africa
ICP	Informed Consultation and Participation
IGAD	Intergovernmental Authority on Development
LMP	Labour Management Procedures
MoEM	Ministry of Environment and Mining
NERAD	National Environment Research and Disaster Preparedness Authority
NTS	Non-Technical Summaries
OHTL	Overhead Transmission Line
OIP	Other Interested Parties
PAHs	Project Affected Households
PIDA	Program Infrastructure Development for Africa
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RoW	Right of Way
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Somaliland Energy Project
SH	Sexual Harassment
SMEs	Small to Medium Sized Enterprises
SNTV	Somaliland National TV
UN	United Nations
WBG	World Bank Group
SEP	Stakeholder Engagement Plan

# I PROJECT OVERVIEW

## I.1 Introduction

Since the fall of central government in 1991, and the subsequent self-declaration of independence in the same year, Somaliland has undergone a relatively successful process of post-conflict peace building and reconstruction over the course of three decades. The sustained political, economic, and institutional reforms have enabled the establishment of core state functions. The country's fiscal position remains largely weak and supported by official development assistance, remittances, and foreign direct investment and still faces persistent unresolved political tensions between its constituents as demonstrated by recent conflict in the Laascanood region.

The Somali energy sector is one of the most underdeveloped in the region. The electricity access rate is estimated at 15 percent, meaning that around 11 million Somalis lack access to electricity services. Access depends significantly on demographic variables, with urban access estimated at 33 percent, and rural access at 4 percent. With an average household size of 5.9, this translates to approximately 1.7 million un-electrified households nationwide. While most countries in the Horn of Africa (HOA) including Somaliland are endowed with significant and diverse renewable energy resources, investment in the sector remains low.

The HoA countries launched the Horn of Africa Initiative in 2019, recognizing the need for a concerted effort to collectively augment the development trajectory. Among the selected areas of priority is investments in development of regional infrastructure networks covering upgrading of economic corridors, energy, and digital connectivity. Regional trade and integration are one of the cost-effective solutions to advance the energy access aspirations, and Somalia score nearly zero in integrated infrastructure index.

The Horn of Africa (HOA) region has been afflicted with persistent conflict and fragility hampering development of basic infrastructure and social service provision to their citizens and industries. Progress towards ensuring access to affordable, reliable, sustainable, and modern energy for all (United Nations Sustainable Development Goal 7) is further constrained by high cost and/or unreliable supply of electricity. The lack of access to adequate electricity is preventing development of small and medium size enterprises, local entrepreneurship, and effective provision of essential services such as healthcare and education.

The proposed Ethiopia-Somaliland interconnectors contribute to Pillar I of the HOA which focus on physical infrastructure investments, technical assistance to regional institutions, and promoting regional approaches to service delivery. These transmission interconnectors were prioritized in the regional strategies as shown in the Horn of Africa Initiative Ministers communique dated October 18, 2019, EAPP Strategic Plan (2018-27) and in the Intergovernmental Authority on Development (IGAD), Regional Infrastructure Master Plan–Energy Sector Report (2020). They form part of the key transmission corridors in EAPP that will result in the interconnection of all 13 EAPP member countries in the next five years that include Burundi, Djibouti, Democratic Republic of Congo

(DRC), Egypt, Ethiopia, Kenya, Libya, Rwanda, Sudan, Uganda, Tanzania, South Sudan and Somalia and has the potential to interconnect with the Southern Africa Power Pool and with the rest of the Middle East.

The World Bank working closely with the government of Somaliland and other governments in the region, proposes to provide support in adopting a regional approach to build physical connectivity and expand access complementing the multitude of national initiatives through Horn of Africa Regional Integration for Sustainable Energy Supply (P174175) Project. The project is aligned with the World Bank's Country Partnership Frameworks and supports the WBG's Africa Regional Integration and Cooperation Strategy and also aligned with the objectives of the HOAI, the EAPP Strategic Plan, and the IGAD Regional Infrastructure Master Plan.

## **1.2 Project Development Objective**

The Horn of Africa Regional Integration for Sustainable Energy Supply (P174175) is a World Bank financed project whose objective is to enhance regional integration of energy supply and to improve energy access in the borderlands in Horn of Africa countries.

## **1.3 Project Components**

### **1.3.1 Component 1-Physical Interconnection Infrastructure**

This component will provide support: (a) the construction of 400 kV transmission lines between Ethiopia and Somalia (Northern and Southern), (b) the reinforcement of the existing Ethiopia-Sudan 230 kV double circuit transmission line, and (c) the construction of the second Ethiopia-Sudan 500 kV transmission line.

### **1.3.2 Component 2-Energy Access Interventions in Borderland Areas**

Component 2 targets energy access interventions in borderland areas, mostly agri-pastoralist population in Ethiopia and Somaliland. It includes the following activities: (a) electricity access to public institutions (for example, health facilities, schools, veterinary posts, community centers, street lighting, telecom towers), (b) electricity access to households, (c) electricity access for productive uses (for example, water points-which are mostly privately owned-refrigeration and cold chains, agri-processing, and so on), and (d) access to clean cooking for households and social centers in borderland communities of the Somaliland. Women are expected to benefit disproportionately from the interventions as they have lesser mobility whereas men tend to travel seasonally for livestock trading and are already engaged in cross-border trading activities. This component will also support a benefit-sharing program for the affected communities by Component 1. This component will prioritize the most vulnerable and underserved communities or development nodes<sup>1</sup> where there is lack of energy access, concentrated presence of public institutions and water

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<sup>1</sup> A development node is defined as a location of strategic importance to maximize the development impact in the area. A development node can be identified by various factors, including, but not limited to, the concentrated presence of services such as water points, education and health facilities; markets (livestock or agricultural markets); communication nodes (telecommunication towers); proximity to trading routes or places of gathering for surrounding communities, nomadic population, and displaced people.

points along trading routes (places of gathering for surrounding communities, including nomadic population) and markets, and existing cross-border trade.

### **1.3.3 Component 3-Technical Assistance and Capacity Building for Regional Power Integration.**

Component 3 will provide technical assistance and capacity building to the EAPP and its member countries. This component will be informed by the Regional Power System Master Plan (RPSMP) 2014 of the EAPP<sup>2</sup> and the African Union Program Infrastructure Development for Africa (PIDA) 2020 Priority Action Plan. In addition, proposed activities will be informed by the EAPP 10-year Strategic Plan (2018–2027) and the Short-term Action Plan (2021–2023).

## **1.4 Project Description**

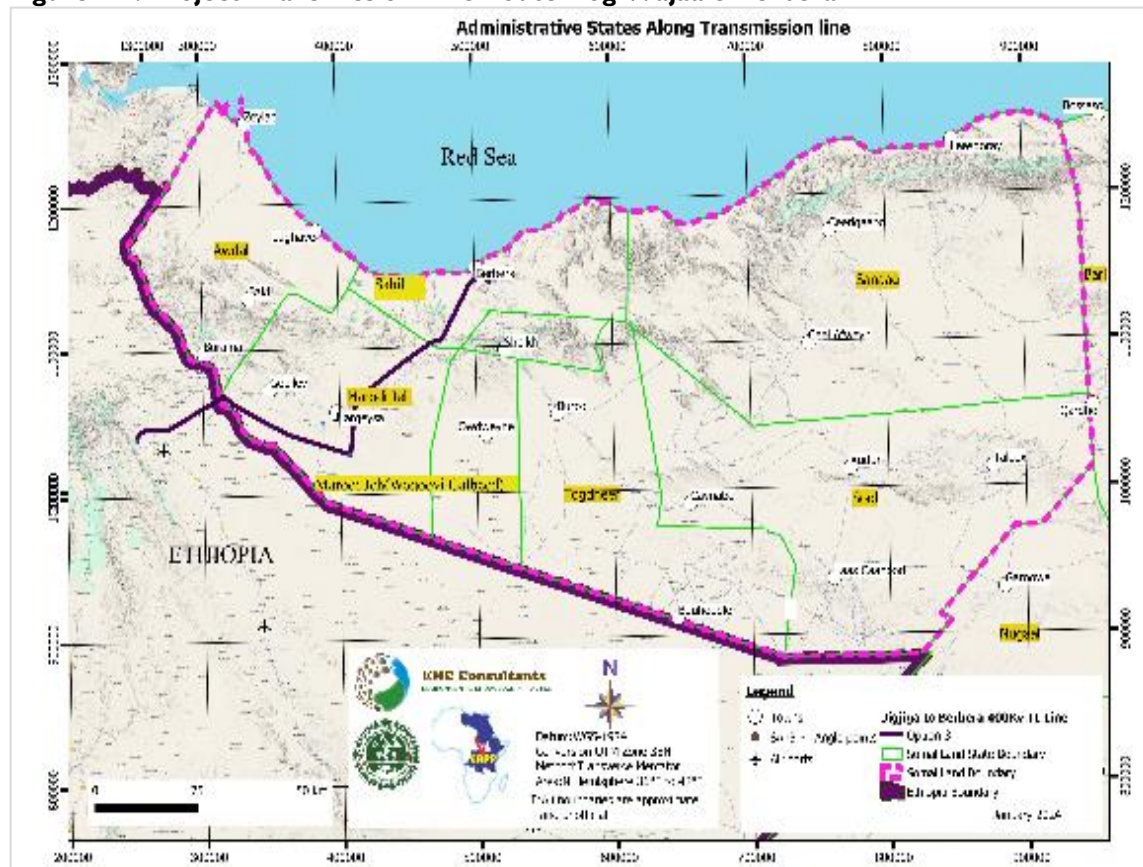
The project will essentially involve the construction the Northern Interconnector which include 330km Bishoftu -Hurso;140km Jigjiga-Hargeisa; 80km Hargeisa-Berbera and sub stations. The line begins at Bishoftu in Oromia region, Ethiopia, to Hurso and then connecting to substation in Jigjiga in Somali region up to Tog Wajaale at the border between Ethiopia and Somaliland. From this point, the line traverses Hargeisa from Wajaale in Somaliland and terminating in Berbera, a port city in Somaliland (Figure 1-1). The Southern Interconnection<sup>3</sup> consists of about 780km of transmission line subdivided into two segments (Negele-Dolo Ado and Dolo Ado-Mogadishu), with the involvement of 3 sub-stations (Negele-Dolo Ado, Mogadishu).

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<sup>2</sup> The RPSMP is subject to update, which is expected to start in June 2021.

<sup>3</sup> A separate SEP for Debre-Zeit-Hurso-Negele-Dolo Ado and Dolo Ado-Mogadishu has been prepared.

**Figure I-I. Project Transmission Line Route-Tog Wajaale-Berbera**



Source: EMC Consultants Limited, 2024.

## 1.5 SEP Objective

The Government of Somaliland recognizes that the Somaliland energy project's stakeholder profile is quite diverse and that their expectations well as capacities to interface with the project are at different levels. This differential necessitates systematic efforts which are best realized by the development of a Stakeholder Engagement Plan (SEP). The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making. The SEP outlines the ways in which the Government of Somaliland will communicate with stakeholders and includes a mechanism by which stakeholders 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. Overall, this SEP will serve the following purposes:

- Identify and analyze different stakeholders at different levels
- Plan engagement modalities through effective communication, consultations and disclosure
- Outline platforms for stakeholders to influence decisions regarding the project
- Define roles and responsibilities for the implementation of the SEP
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings

- Define roles and responsibilities of different actors in implementing this Plan
- Elaborate the grievance management for the project
- Outline the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website
- Document stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

## **1.6 World Bank Requirements for Stakeholder Engagement**

This project is being prepared under the World Bank’s Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 on Stakeholders Engagement and Information Disclosure, the implementing agencies are required to 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 and intimidation.

## **1.7 Effective Stakeholder Engagement Principles**

Stakeholder engagement will be free of manipulation, interference, intimidation, and coercion, and conducted on the basis of timely, relevant understanding, accessible information and in a culturally appropriate format. It will involve interactions between identified group of people, providing them with an opportunity to raise concerns and opinions and ensuring the information provided is taken into consideration in decision making. Common principles based on international best practice are:

- Transparency will be demonstrated when stakeholder concerns are acted upon in a timely, open, and effective manner.
- Trust is achieved through open and meaningful dialogue that respects and uphold the stakeholders’ values, opinions, and beliefs.
- Integrity will occur when engagement is conducted in a manner the fosters mutual respect and trust.
- Respect will be created when rights, cultural beliefs, values, and interests of stakeholders are recognized.
- Commitment will be demonstrated by the need to understand, engage, and identify stakeholders is recognized and acted upon early; and
- Inclusiveness will be achieved when broad participation is encouraged and supported by providing appropriate participation opportunities.

## 2 STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 2.1 Stakeholder Identification

The World Bank ESS 10 describes “stakeholder” as individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties). This may include individuals, businesses, communities, local government authorities, local non-governmental and power generating and distribution companies, and other interested or affected parties”. In line with the principles of ESS 10, stakeholders are divided into two types:

- “Affected parties—persons, groups and other entities within the Project Area that are directly influenced (actually or potentially, positively, or adversely) by the Project and/or have been identified as most susceptible to change associated with the Project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures; and also included are the disadvantaged/vulnerable individuals or groups (as defined in section 3.4 of ESS10).
- Interested parties are stakeholders who may be able to influence decisions on the Project or have an interest in the project”.

To develop an effective SEP, it is necessary to identify stakeholders and understand their needs and expectations for engagement, and their priorities and objectives in relation to the proposed Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process, it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalized or vulnerable status.

#### 2.1.1 Project Affected Communities/Parties

In this project, affected communities are those persons, community members, groups, government entities and institutions, business entities and individual entrepreneurs and other entities within the vicinity or Area of Influence (AoI) that are impacted or likely to be impacted directly, by the project. For this project these include communities, landowners in ROW, business-persons and entities, settlements/communities within RoW

#### 2.1.2 Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged/vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project. This category of PAP is present along the transmission line route in Somaliland.

**Table 2—1. Stakeholder Engagement with Vulnerable and Disadvantaged Groups**

Vulnerable groups	Potential barriers to limit effective engagement	Specific needs to address the stakeholder barriers
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IDPs, returnee and refugees	<ul style="list-style-type: none"> <li>■ Access to IDP camps.</li> <li>■ Limited understanding or interest</li> </ul>	<ul style="list-style-type: none"> <li>■ Sensitization through their representatives.</li> <li>■ Organize meeting with their representatives</li> </ul>
Poor households such as female-headed and child-headed households and elderly people, youth	<ul style="list-style-type: none"> <li>■ Lack of time to participate.</li> <li>■ Transportation cost</li> </ul>	<ul style="list-style-type: none"> <li>■ Flexible timing for meetings.</li> <li>■ Provision of transports cost</li> </ul>
People with disabilities	<ul style="list-style-type: none"> <li>■ Physical disabilities preventing mobility.</li> <li>■ Various disabilities (e.g., visual, hearing, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>■ Sign language.</li> <li>■ Ensure other family members or relatives accompany during meetings.</li> <li>■ Accessible consultation venues</li> </ul>
minorities, nomadic groups,	<ul style="list-style-type: none"> <li>■ Lack of time to participate.</li> <li>■ Transportation cost</li> </ul>	<ul style="list-style-type: none"> <li>■ Flexible timing for meetings.</li> <li>■ Provision of transports cost</li> </ul>

### 2.1.3 Other Interested Parties

These groups constitute individuals/groups/entities other than the directly affected communities whose interests may be affected by the project and who have the potential to influence project outcomes. Other Interested Parties (OIP) may not experience direct impacts from the Project, but they may 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 are government institutions, media and development partners supporting the electricity sector, business companies and entities that may be involved in the provision of services and the interest groups, Civil Society Organizations<sup>4</sup> (CSOs) international and national non-governmental organization.

## 2.2 Stakeholder Analysis

Stakeholder mapping is a process of examining the relative influence that different individual and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to:

- Profile stakeholders identified and the nature of the stakes.
- Understand each group's specific issues, concerns as well as expectations from the project that each group retain; and
- Gauge their influence on the project.

Stakeholder analysis is the process of identification of key stakeholders, an assessment of their interests in the project and way in which these interests may affect the project. The reason for doing a stakeholder analysis is to identify who to inform and consult, who to build and nurture relationships with and what roles they should play and at which stage. Based on this understanding, stakeholders are categorized as:

<sup>4</sup> A civil society organization (CSO) or non-governmental organization (NGO) is any non-profit, voluntary citizens' group which is organized on a local, national, or international level.

- **High Influence:** are those who are expected to have a high influence over the Project or are likely to be heavily impacted by the Project activities: they should thus be high up on the Project’s priority list for engagement and consultation.
- **Medium Influence:** are those who are expected to have a moderate influence over the Project or even though they are to be impacted by the Project, such impact is deemed unlikely to be substantial: these stakeholders should thus be neither high nor low on the Project’s engagement list.
- **Low Influence:** are those who are expected to have a minimal influence on the decision-making process or are to be minimally impacted by the Project: they should thus be low on the Project’s engagement list.

Table 2-3 below provides brief profiles of the various stakeholders in the project and their likely degree of influence.

**Table 2—2. Stakeholders and Project Impact/Influence-Somaliland**

Stakeholder Category	Level of Interest	Level of Influence
Project Affected Persons	High Level of Interest	Low Level of Influence
Government Bodies	High Level of Interest	High Level of Influence
Civil Society Organization	High Level of Interest	High Level of Influence
Local Government Authorities	High Level of Interest	High Level of Influence
Private Sector	Medium Level of Interest	High Level of Influence
Media	Medium Level of Interest	High Level of Influence
Development Partners	High Level of Interest	High Level of Influence

### 2.2.1 Summary of Previous Stakeholder Engagement Activities

During the ESIA study, several consultations took place at the different levels in Somaliland involving the PAPs including vulnerable groups, various government agencies and other interested parties. The consultations were to discuss the project locations, areas of influence, concept, design, institutional arrangement, potential impacts, mitigation measures, stakeholder engagement plan and EAPP-PIU and MoEM commitments among others. Table 2-4 presents a summary of the stakeholders’ concerns consulted as part of the on-going ESIA studies in Somaliland during the period between 10<sup>th</sup> January-23<sup>rd</sup> March 2024 with stakeholders including local communities and government. See appendix 4 and 5 on the list of stakeholders consulted.

**Table 2—3. Stakeholders Consultation Summary of Concerns**

Theme	Comments and Issues	Response
<b>Employment</b>	<p>Community members inquired whether there will be employment opportunities and what would be the criteria for gaining access to such opportunities.</p> <p>They decried an ongoing pattern of contractors hiring persons who don’t reside in their localities to carry out tasks that locals are capable of doing</p>	<p>The consultants informed stakeholders that they have incorporated the development of a Community Engagement Plan and a Labour Recruitment Plan in the ESIA.</p> <p>These plans will cover all employment issues ranging from recruitment, dismissal, hours of work, non-discrimination, child labour, fair remuneration and grievance management.</p>

	<p>and requested that, in this project, they be given first priority whenever employment opportunities arise.</p> <p>Female participants were especially concerned that they would not be given opportunities to work in the project because of societal perceptions that they are physically weak and are exclusively responsible for domestic affairs. In addition to this, they foreshadowed possibility of rise in incidences of children dropping out of school to take up paid labour in the project.</p>	<p>Stakeholders were however cautioned that where specialist skills are required for the project and the skills are not locally available, specialist would be hired from other jurisdictions through a competitive process.</p>
<b>Land Use and Compensation</b>	<p>The members noted that they would incur loss of land and property since residents may be required to relocate. They noted that relocation would interfere with their economic affairs and separate them from their kin.</p> <p>They inquired about the land acquisition process, timelines for compensation, persons entitled to compensation and the amount of money to be paid.</p>	<p>The community was informed that a RAP study will be commissioned and will be conducted and implemented in accordance with World Bank Standards and national legislation.</p> <p>This will ensure that all affected persons are compensated in a fair and timely manner. Compensation will be done following proper identification of affected persons and thorough valuation of their assets.</p> <p>They were further informed that the RAP process would incorporate grievance-handling mechanism to settle any disputes that may arise.</p>
<b>Waste Generation</b>	<p>Stakeholders were concerned about waste generation and methods of waste disposal during project implementation.</p>	<p>The consultants informed community members that the ESIA report will recommend that a waste management plan be put in place; Waste will also be handled and transported by certified waste handlers.</p>
<b>Social Impacts</b>	<p>It was a concern of the community members that the proposed project will increase the population in the project area and its surroundings which could lead to socio-cultural diversification and cultural contamination.</p> <p>There were fears that with the increase in population, there will be an increase in the spread of HIV and AIDS, teenage pregnancies, drug and alcohol abuse and prostitution.</p> <p>Further they stated that enhanced economic status particularly among</p>	<p>The consultants and the clients' team informed the community that it will put in place sufficient safeguards to mitigate such incidences through for instance, developing and implementing a grievance redress mechanism; putting in place a sexual harassment policy and a HIV/AIDS prevention and awareness plan.</p> <p>A robust GRM will be established by the project to address project related grievances.</p> <p>GBV (SEA and SH) resulting from project operations will be managed in line with the GBV Prevention and Response Action Plan that will be prepared and will apply the principle of survivor centered approach. The</p>

	<p>the women and youth would lead to increased occurrences of SGBV.</p> <p>Concerns were also raised about competition for limited resources due to population influx. This would particularly manifest in inadequate housing and shortage of water supply.</p>	<p>project will facilitate survivor/guardians to access referral pathways that they wish to access, such as legal, police, counselling services etc., which the project is expected to map as part of GBV management.</p>
<b>Flora and Fauna</b>	<p>Loss of protected forests/conservation areas/rare plants</p>	<p>Identify vegetation that will need to be removed/protected; Remove identified trees in such a way as to minimise damage to surrounding vegetation; Ensure the construction crew is aware remaining vegetation must not be touched or damaged; Avoid installation of the transmission line through vegetation areas; compensation in accordance with RAP; Preserve valuable habitats and important trees along the high-power transmission lines, discussion with clan leaders</p>
<b>Health and Safety Issues</b>	<p>The stakeholders were concerned that there would be electromagnetic radiations and risk of electrocution that may affect those residing near the way leave.</p> <p>Some community members were wary of the presence of the high-voltage wires in their immediate environment, due to perception that it causes cancer</p>	<p>The team informed the community that possible health hazards will be mitigated using up to date state of the art technologies and measures will be put in place to ensure health and safety measures are observed at all times through the development and operation of the project.</p> <p>They were reminded that in such projects, the proponent is always required to develop and implement a community health and safety plan and the proponent has been informed to do so through the ESIA.</p>
<b>Aviation Risks</b>	<p>Hazards to low flying aircrafts</p>	<p>The proposed project must be installed based on the rule and regulation of civil aviation authority and smaller air strips have to be identified and considered during the installation of the high-tension power with its future expansion</p>
<b>Noise and Vibration</b>	<p>Questions concerning potential air and sound pollution arising from excessive noise and vibration also arose from community members</p>	<p>The community was informed that the project will be using up to date technologies to improve efficiencies to reduce noise and vibrations and further mitigation measures will be recommended in the ESMP.</p>
<b>Air Pollution</b>	<p>Some of the stakeholders feared that the project will generate emissions and generate dust leading to air pollution.</p>	<p>The community was informed that the project will be using up to date technologies to improve efficiencies to reduce emissions and mitigation measures will be put in place to reduce emissions in line with national air quality regulations and international best practice.</p>
<b>Water Quality</b>	<p>The community raised concerns on impact of the project on water quality. They stated that water</p>	<p>The community was informed that the ESIA will propose that a waste management plan.</p>

	resources may be contaminated by project waste rendering it unfit for human consumption. They were also concerned about over abstraction during project implementation.	Community was informed that the project had taken into account the estimated water usage for the project and made plans for alternative water sources to ensure adequacy of water for the project without depleting local resources.
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## 3 STAKEHOLDER ENGAGEMENT

### 3.1 Stakeholder Engagement Principles

To ensure compliance with ESS 10, the project will apply the principles outlined in chapter 1.8 during stakeholder engagement.

### 3.2 Stakeholder Engagement Program

Stakeholder engagement is an important inclusive process conducted throughout the project cycle and is critical to the successful implementation of projects. The engagement will be free of manipulation, interference, coercion, and intimidation; and conducted based on timely, relevant, understandable, and accessible information, in a culturally sensitive format. In this section an elaboration of how to facilitate effective stakeholder engagement throughout project implementation and operation phase is outlined. It addresses key factors considered in elaborating the program, the specific communication tools to be adopted for different stakeholder groups, the specific stakeholder engagement activities and the resource requirements and responsibilities for implementation.

For the engagement process to be effective and meaningful, a range of approaches will be applied, which will be tailored specifically to the identified stakeholders. For Affected Community stakeholders, the format of each engagement activity (whether focus group discussions or public meetings) will meet general requirements on accessibility; If necessary, assistance may be provided to enable vulnerable people to attend meetings.

Engagement will be based on the following key principles of good practice:

- Timeliness to consider key issues and provide input to EEP-PIU/MoEM-PIU decisions.
- Dissemination of information in readily understandable formats and using culturally appropriate techniques, in advance of engagement events/meetings, to ensure that stakeholders are informed.
- Gender-inclusivity (for meetings/events, where it is feasible to do so, setting a target of 50% participation by both men and women respectively at each event)
- Free from manipulation and coercion;
- Documentation to keep track of who has been consulted and the key issues raised with feedback to stakeholders at key stages in the project implementation process.

### 3.3 Information Disclosure

The environmental and social instruments including Non-Technical Summaries (NTS) of ESIA, Resettlement Policy Framework (RPF), Security Risk Assessment and Management Plan (SRAMP), Resettlement Action Plan (RAP), Stakeholder Engagement Plan, Labour Management Procedures (LMP), SEA/H Prevention and Response Action Plan will be translated into Somali language prior to disclosure. Leaflets for consultation events will be prepared in local language and English. The main mechanisms for information disclosure are presented below by type of stakeholder engagement event:

- **Meetings with officials:** Intended work programme and/or Power Point slide presentation will be made available. These will be used, as appropriate, depending on the stakeholders and the timing of the meetings.

- **Focus Group and other types of non-public meetings:** Leaflet and Power Point slide presentation. Leaflets will be available, and the appropriate versions will be distributed according to stakeholder type and needs. Leaflets will be distributed at least 3 working days prior to meetings. Power Point presentations will be made at the beginning of meetings. Each meeting agenda will have time allocated to clarifications and questions focused on the Project; and
- **Public Meetings:** The NTS of ESIA, RAP, RPF, SRAMP, Stakeholder Engagement Plan, Labour Management Procedures, PPT presentations, and leaflets will be made available. The reports will be available in Somali language and English only. Information will be displayed at different public buildings in the locality of a public hearing and at least 3 working days in advance of a public hearing. Leaflets will be available in selected public locations for members of the public to consult/take away (maximum of two leaflets per person to be taken away) at least 3 working days in advance of a public hearing.
- **Social media platforms:** In addition, the websites of EAPP-PIU/MoEM-PIU will be used to provide up-to-date Project information. It will also be possible for users to provide feedback or ask questions about the Project via email and the website.

In order to ensure disadvantaged or vulnerable needs are taken into consideration, and that they are reached, the project will adopt several mechanisms, such as, publishing all information about the project in local language, holding workshops or meetings at suitable location that women can easily access, provide needed facilities in public meetings for handicap or people with disabilities. In addition, when designing the grievance mechanism, the EAPP-PIU and MoEM-PIU will take into account the availability of needed recourse for vulnerable groups to give feedback or send a complaint.

### 3.4 Information Communication

Communications alerting stakeholders to future stakeholder events/meetings and, also, concerning organizations/logistical aspects of stakeholder events/meetings, and grievance reporting channels will be provided by a range of means, but primarily by:

- **Public announcements.** The EAPP-PIU/MoEM-PIU will place announcements in key public locations, such as bulletin boards at local government offices and other public sector buildings.
- **Emails.** EAPP-PIU/MoEM-PIU will inform stakeholders of project milestones and other current project news (it is recognised that stakeholder access to emails will be variable).
- **Media (primarily radio and newspapers, social media platforms) announcements/notices:** These will mostly concern provision of key information about project milestones and certain engagement events/meetings, especially public hearings; and
- **Oral communications:** Community leaders will be requested to inform other community members about stakeholder events/meetings to be organised in their community/locality.

### **3.5 ESIA Report: Impact Assessment Phase**

An overview of the planned stakeholder engagement activities, to occur at an early phase in the work to prepare the ESIA Report, with a breakdown by stakeholder group is given in Table 3-1. This table will be updated during the project preparation, and throughout project implementation phases.

### **3.6 Project Cycle Phase Consultation**

The Stakeholder Engagement Program, through an Informed Consultation and Participation (ICP) process, includes set of actions with targeted audience and responsibilities in order to ensure the maximum engagement level for all relevant stakeholders. The ICP process presented below covers 4 phases of the Project cycle. The Project cycle comprises the following:

- Preparation and design phase
- Pre-construction Phase
- Construction Phase
- Operation Phase.
- Decommissioning Phase

EAPP-PIU/MoEM-PIU, as part of the stakeholder engagement, will disclose the following information and documentation regarding the Project on its website:

- Stakeholder Engagement Plan
- Project description and updates regarding the implementation progress of the Project,
- Environmental and Social Risks and Impacts of the project (both positive and negative) as contained in the ESIA report and including LMP, SEA/H Prevention and Response Action Plan, RAP, SRAMP and Resettlement Policy Framework (RPF)
- The Grievance Redress Mechanism, its objectives, and the information request form
- Benefits sharing report.

The information packages will be available in English and Somali languages immediately upon the commencement of the Project. Information packages will be accessible through websites of the affected districts, regions, states. Summaries (printed copies) of SEP, ESIA, LMP, RAP, RPF, SEA/H Prevention and Response Action Plan reports will be available in all affected districts, and Project offices. The Contractor will also disclose site specific ESMP (as recommended in the ESIA reports) and site specific ESIA in its own website. It is important to note that, these documents and information will remain in the public domain for the entire duration of the Project.

#### **3.6.1 Preparation and Design Stage**

#### **3.6.2 Pre-Construction Phase**

Activities during the preparation and design phase as part of the pre-construction phase primarily include preparation of feasibility study/detailed design (a consultant has been recruited and has completed the designs), preparation of various environmental and social instruments including Resettlement Action Plan (RAP), Labor Management Procedures (LMP), Environmental and Social Impact Assessment (ESIA), Security Risk Assessment and Management Plan (SRAMP), SEA/H Prevention and Response Action Plan, all which

have been prepared for the project. During pre-construction phase, these information packages will be updated as needed and disclosed. It is important to notify local stakeholders, in a meaningful and timely manner, of any activities that might impact them using the listed environmental and social instruments/reports prepared for the project and which will be disclosed in pre-construction phase. The disclosure and consultation activities will be designed along the following objectives:

- Consultation events and opportunities will be widely and proactively publicized (two weeks prior to any meeting).
- The environmental and social instruments summaries will be accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting,
- The location and timing of any meeting will be designed to maximize accessibility to affected stakeholders,
- Accessibility to the meeting venues (i.e. transportation services) will be provided for each affected settlement,
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities,
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns,
- Issues raised will be answered at the meeting or actively followed up.

Prior to the commencement of the construction phase, the RAP prepared will be implemented in full. The contractor will not commence the construction activities until the PAPs are compensated in accordance with the RAP.

### **3.6.3 Construction Phase**

The aim of the construction phase stakeholder engagement is to minimize the community health and safety impacts of the Project, management of the potential contractors, management of the grievance mechanism and minimization of the construction related impacts. The Contractor will use this SEP to engage with stakeholders, construction related comments and suggestions. Feedback received regarding the construction activities (i.e. design suggestions, etc.) will be managed through the process determined through the Grievance Redress Mechanism. Stakeholder engagement activities that will be held during the construction phase is presented in [Table 3-1](#) below.

### **3.6.4 Operation Phase**

The aim of the operation phase stakeholder engagement is to introduce the public possible operational impacts and information about the transition of the responsibilities from the Contractor to electricity management utility in Somaliland and increase the capacity of the utilities to ensure the implementation of SEP. Stakeholder engagement activities that will be held during the operation phase is presented in [Table 3-1](#) below.

**Table 3—I: Planned Stakeholder Engagement Methods and Information Disclosure**

#	Activity – Preconstruction phase	Timelines	Stakeholder Category	Responsibility	Disclosure: Methods
1	<p>Disclosure of environmental and social instruments (ESIA, LMP, RAP, SRAMP, SEP, SEA/H Prevention and Response Action Plan, RPF.</p> <p>During the disclosure process, affected communities will be informed on outcomes of the environmental and social studies. This will include potential significant Project related beneficial and adverse impacts that were assessed during the ESIA, studies as follows:</p> <ul style="list-style-type: none"> <li>- Impacts on ecosystem services</li> <li>- Impacts on ecology and habitat loss</li> <li>- Impacts related to land acquisition and resettlement</li> <li>- Impacts on cultural heritage sites/areas</li> <li>- Impacts on environment (including construction and operation noise, air quality, resource efficiency and waste management).</li> </ul> <p>Labour and working conditions related issues Inclusion issue Sexual exploitation, abuse and harassment</p> <p>Introduce Stakeholder Engagement Plan and Project Grievance Mechanism</p>	SEP (before appraisal) and the rest of instruments including LMP, RAP, SMP, SEAH before commencement of activities.	All stakeholders	Joint EAPP/PIU	<ul style="list-style-type: none"> <li>• Public Participation Meeting</li> <li>• Project leaflets</li> <li>• Community notice boards/banners indicating information of the ESIA studies and measures to be considered.</li> <li>• Announcement on the Project website</li> <li>• Announcement on the Municipalities website,</li> <li>• Mass media (local newspapers, TV channels, radio, social media).</li> <li>• Hard copies of NTS on the affected village offices and municipal buildings</li> <li>• Soft copies of NTS, SEP and RPF to be available for public review in EAPP, PIU’s website</li> <li>• Information on the grievance mechanism and the stakeholder engagement tools through webinars, leaflets, banners and website.</li> <li>• Distribution of the Contact details of the Public Relations Officers,</li> <li>• Records of the grievances</li> <li>• Public notice and official correspondence by concerned authorities and organization.</li> <li>• Website</li> <li>• Noticeboards on the affected local municipalities</li> <li>• Individual compensation agreements and the Grievance Records</li> </ul>
4	Informed consultations on land acquisition and compensations during the finalization of Resettlement and Livelihood Restoration Plan used to develop specific Resettlement Action Plan	Before commencement of construction activities	Landowners and land users’ Informal landowners and land users	Joint EAPP/PIU	<ul style="list-style-type: none"> <li>• Public notice and official correspondence by concerned authorities and organization.</li> <li>• Website</li> </ul>

			Owners of assets, structures, buildings, and businesses that will be affected by the Project		<ul style="list-style-type: none"> <li>• Noticeboards on the affected local municipalities</li> <li>• Individual compensation agreements and the grievance records</li> </ul>
6	Engage with stakeholders during preparation of site-specific RAPs and implementation of individual measures as prescribed in the RAP	Before commencement of construction activities	All Stakeholders	Joint EAPP/PIU	<ul style="list-style-type: none"> <li>• Social survey of all affected households with individual visits (if applicable) to each affected household</li> <li>• Disclosure of draft RAP</li> <li>• Dissemination of Cut-Off date via public announcements (through local media, banners, website, etc.)</li> </ul>
#	Activity – Construction Phase	Timelines	Stakeholder Category	Responsibility	Disclosure: Material Mechanisms and Timing
1	<p><b>Information Disclosure on:</b></p> <ul style="list-style-type: none"> <li>• Purpose and nature of the construction activities</li> <li>• Early notification of construction start date, scheduling, and duration.</li> <li>• Potential impacts and health and safety measures/mechanisms</li> <li>• Notification of any transport disruptions.</li> <li>• Notification of construction activities, closure of roads, pedestrian accessibility, etc.</li> <li>• Notification of schools and hospitals nearby the project site will be informed about the peak movements of the vehicle.</li> <li>• Information on any activities likely to cause disturbance locally such as construction noise and vibration</li> </ul> <p><b>Labour Related Issues</b></p> <ul style="list-style-type: none"> <li>• Recruitment and procurement</li> <li>• Employment of local workers</li> <li>• Occupational health and safety</li> <li>• Recruitment of employees</li> </ul>	Commence prior to construction and continue throughout the project construction period.	<p>All affected settlements and Interested parties</p> <p>Vulnerable Groups</p> <p>Local Authorities</p> <p>Local Businesses</p> <p>Animal owners nearby the construction activities</p> <p>Beehives nearby the construction site</p>	Joint EAPP/PIU Contractor EHS Teams	<ul style="list-style-type: none"> <li>• Regular site visits,</li> <li>• Annual Environmental and Social Monitoring Reports</li> <li>• Official meetings with the governmental bodies and CSOs</li> <li>• Grievance Mechanism</li> <li>• Banners posted in public amenity buildings, construction sites.</li> <li>• Project website</li> <li>• Direct phone calls to head of villages, sensitive receptors and to the hospitals, nursing homes, schools and presenting direct phone call number to be contacted in cases of emergency notices.</li> <li>• Direct phone calls in regard to road closures to the affected head of villages and/or advertisement through the local media and website</li> <li>• Banners posted to present construction schedule, road closures and measures to be considered in terms of community health and safety</li> </ul>

	<ul style="list-style-type: none"> <li>• Training of staff</li> <li>• Procurement of supplies and services</li> <li>• Design of capacity development program for local people through targeted training programs internally and with key external training partners</li> </ul>				<p>in head of villages' offices, public amenity buildings, construction sites.</p> <ul style="list-style-type: none"> <li>• Grievance mechanism</li> <li>• Phone calls to notice the affected villages' representatives' days prior to the activities to be conducted to the arranged site and providing a direct phone number of the construction/EHS supervisor.</li> <li>• Contacting to the nearby beehive owners (if any) days prior to the activities to be conducted to the arranged site.</li> <li>• Banners posted in village amenity buildings and construction sites (including information on grievance mechanism)</li> <li>• Grievance and suggestion boxes located at the construction sites.</li> <li>• Contact person available on-site during works, and their contact details prominently displayed at the entrance to the site (s).</li> <li>• Direct phone calls made to nearby schools and hospitals days prior to construction activities.</li> <li>• Direct engagement with the nearby head of villages and notify them about the options to contact in regard to potential grievances.</li> <li>• Monitoring noise related grievance cases to be closed sufficiently through collecting feedback from the complainant (if the contact information</li> </ul>
4	<p>Feedback and grievance mechanism</p> <ul style="list-style-type: none"> <li>• Training on grievance procedures</li> <li>• Grievance resolution process and the workers GRM (including in response to security, construction or contractor issues)</li> </ul>	Commence prior to construction and continue throughout the project construction period.	All affected settlements, Interested parties and Project Workers	Contractor EHS Teams	<ul style="list-style-type: none"> <li>• Advertisement on the Grievance Mechanism through Project banners, leaflets, and the Project's website direct phone calls, emails, and face-to-face meetings, village visits.</li> </ul>

	<ul style="list-style-type: none"> <li>Provide training on the Contractor's policies (employees and contractors) on respectful and appropriate behaviors with communities</li> </ul>				
5	Inform stakeholders regarding the construction works that are nearby or within the forests, where ecosystem service-related activities are common by the locals.	Commence prior to construction and continue throughout the project construction period.	Project Affected Persons Vulnerable Groups	Contractor	<ul style="list-style-type: none"> <li>Place project banners entrance and common areas where the construction works will occur.</li> <li>Contact head of villages directly days prior to the construction activities to notice them on construction works, measures took into consideration and contact information for grievances.</li> <li>Warnings signs to be placed prior to start of the construction activity, including a direct contact number of the construction supervisor.</li> <li>Grievance and suggestion boxes located at the construction sites</li> </ul>
7	Develop, implement, and keep informed local communities on: <ul style="list-style-type: none"> <li>Community health and safety plan</li> <li>Local procurement plan</li> <li>Traffic management plan</li> <li>Emergency response plan</li> </ul>	Commence prior to construction and continue throughout the project construction period.	All affected settlement	Contractor EHS Teams	Contractor's website, official correspondence, mass media, local notice boards and premises of municipalities
8	Disclose information on project Environmental and Social construction performance	Throughout project construction phase	PAPs Interested Stakeholders	Contractor	Contractor's website

## 4 GRIEVANCE MECHANISM

The goal of the Grievance Mechanism (GM) is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, the GM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help improve the project impacts. Under the World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances. This GM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The project will provide mechanisms to receive and facilitate resolutions to such concerns. For the purposes of this SEP, communications from stakeholders are considered to involve comments/concerns and grievances, as follows:

- Comments/concerns raised by an individual or group may, or may not, arise from a specific impact or incident that is related to a project activity. They can be positive or negative observations on general project performance and, also, can take the form of questions or requests for information; and
- A grievance is a complaint, raised by an individual or group, related to a specific impact or incident, which is considered to affect, adversely, the interests of the complainant.

### 4.1 Grievance Types

The category of grievance likely to manifest itself during the project implementation include:

- Property (built structures) damage.
- Land encroachment.
- Access restriction
- Damage to land/crops
- Damage to livestock
- Water availability/quantity (e. g. supply disruption)
- Water quality (e.g. pollution)
- Noise/air quality (including dust)
- Resettlement/valuation/compensation
- Traffic/vehicle behaviour (e. g. speeding)
- Corruption
- Nepotism and favouritism in recruitment retention and dismissal
- Misuse of project funds
- Fraudulent activities
- Other (Specify)

## 4.2 Comment/Concern Management

Comments/concerns will be conveyed to the EAPP-PIU/MoEM-PIU via the same means as grievances (section 4-2 below). Once received they will enter into the EAPP-PIU/MoEM-PIU external communication procedures and feedback will be provided according to the requirements of the procedure. Concerns will be identified and every month concerns will be analysed and a report provided to the appropriate senior manager. This will alert managers to concerns, for example on vehicle speeds, that may be increasing in number, and which may soon give rise to grievances. This ‘early warning’ enables swift action to be taken to address the concerns and, thus, avoid the receipt of grievances in the future.

## 4.3 Grievance Mechanism

This section presents a transparent procedure that EAPP-PIU/MoEM-PIU will employ to manage grievances received from external stakeholders such as Affected Communities and interested parties. For project workers, a separate workers’ Grievance Mechanism will be established and will be operated by contractor and monitored by the EAPP-PIU/MoEM-PIU’s social specialist (refer to Labour Management Procedures). Grievances may take the form of specific complaints about impacts, damage or harm considered to have been caused by the Project, and about access to the Project stakeholder engagement process. This Grievance Mechanism has been developed with the following aims:

- To build and maintain trust with all stakeholders.
- To prevent adverse consequences of failure to adequately address grievances; and
- To help identify and manage stakeholder concerns and thus support effective risk management.

### 4.3.1 Grievance Mechanism Structure and Key Principles

The grievance mechanism, developed for the Project (and to be applicable during the project implementation phases) is based on the following principles and attendant EAPP-PIU/MoEM-PIU’s commitments:

- **Accessibility:** Ensuring that the grievance mechanism is accessible to those who may wish to submit a grievance. It includes the ability to submit a grievance verbally.
- **Disclosure:** Publicising and explaining the grievance mechanism to all external stakeholders.
- This disclosure will be implemented in a format and language readily understandable to the local population and/or communicated orally in areas where literacy levels are low. In addition to informing stakeholders about the grievance mechanism, the EAPP-PIU/MoEM-PIU using various methods in Table 3-1 will report back periodically to stakeholders on how it has been responding to the grievance it has received.
- **Transparency:** Clarifying at the outset who is expected to use the grievance mechanism and assuring stakeholders that there will be neither costs nor retribution associated with lodging a grievance. Stakeholders will be informed that grievance can be submitted anonymously and that they can request that their identity be kept confidential. The entire process—from how a grievance is received and reviewed, through to how decisions are made and, in the case of a grievance, the possibilities

that exist for appeal–will be made as transparent as possible through good communications.

- **Efficiency:** Publicly communicating and committing to a timeframe within which all recorded grievance will generate a response and ensure that all response times are met. This will help to allay frustration by informing people when they can expect to be contacted and/or receive a response to their grievances. During critical time periods, such as during the project construction phase, it is important to have an early (if not immediate) response to time sensitive grievances.
- **Fairness:** Ensuring that an appeal procedure for complainants who reject EAPP-PIU/MoEM-PIU intended action to redress a grievance is in place.
- **Written records:** Maintaining written records of all grievances received (comments/concerns will be recorded and tracked under a wider stakeholder engagement database) as this is critical for effective grievance management. Each record will contain:
  - The name of the individual or organisation
  - The date and nature of the grievance
  - The date set for the resolution of the grievance.
  - A description of subsequent EAPP-PIU/MoEM-PIU actions taken
  - How and when this decision was communicated to the complainant
  - The complainant’s response to the action
  - Date of acceptance by the complainant of the action to resolve the complaint;
  - Date and timeframe for an appeal lodged by a complainant against the EAPP-PIU/MoEM-PIU’s action; and
  - Date of acceptance or rejection by the complainant of the appeal decision.

#### **4.4 GRC Establishment and Capacity Building**

The members of the GRCs will be appointed with the participation of the representatives of the affected PAPs in the project area participating.

##### **4.4.1 Grievance Redress Committee Composition**

The GRC will be established at the project level. Its role will be to act to resolve grievances related to the project. The permanent members of the GRC will include PIU’s project coordinator, social specialist, environmental specialist, contractor representative, supervising engineer representative and depending on the area, the head of the administration at that area, clan elder. Co-opted members will include a village chairperson/clan and sub clan leaders and elder, religious leader. Other members will include one project affected youth, one project affected woman, one project affected male and one representative of vulnerable PAHs.

##### **4.4.2 GRC Capacity-Building and Remuneration**

The GRCs will also need to be oriented to the grievance management system. The capacities of the GRCs will also need to be built around issues of conflict identification, conflict information analysis and conflict resolution as provided for in the land legislation. All the members of the GRCs established at the different levels will perform their duties

on a voluntary basis. There will be no remuneration other than costs associated with transport, communication, meals and sitting allowance.

## **4.5 Grievance Mechanism Procedure**

### **4.5.1 Grievance Reporting/Lodgment**

These are expected to include:

- Locating grievance boxes in well-known and publicly accessible locations e.g. office of village administrator; zone, district, project office, contractor sites etc.
- Complainants can submit a written grievance.
- In-person at a physical facility e.g. office of village administrator; zone, district, project office, contractor sites etc.
- Social specialists in EAPP-PIU/MoEM-PIU who are regularly in contact with local stakeholders (presented orally or in writing)
- Via email or via dedicated website pages of EAPP-PIU/MoEM-PIU/Contractor
- Via Social media of EAPP-PIU/MoEM-PIU/Contractor
- By telephone/SMS to a dedicated telephone number (too free cell and landline numbers).

In its disclosure of the grievance mechanism, the means to be used to submit a grievance and take immediate action to ensure that these means are in place and working will be explained.

### **4.5.2 Grievance Identification**

When a grievance is lodged by a complainant, it is recorded in the Grievance Form (Appendix 1) by the secretary to the GRC who is the designated person for receiving complaints. Both parties (secretary to the GRC and complainant) then ‘sign off’ the Grievance Form (Step 1). If a grievance does not relate to the Proposed Project, the secretary of the GRC will contact the complainant and provide the details of the appropriate person or organization to address the grievance raised.

### **4.5.3 Registration and Categorization**

All grievances received verbally or in writing will be recorded by the secretary of the GRC in the Stakeholder Grievance Procedure Database (Appendix 2) by means of the Grievance Tracking and Close-Out Form (Appendix 3). The secretary of the GRC will assess the significance of the grievance and allocate it to one of the following categories:

- **Critical Priority:** potential for significant breach of EAPP-PIU/MoEM-PIU’s policies and/or negative media attention or a local, isolated, or ‘one-off’ grievance that may affect the interests of a community to the extent that livelihoods of a significant number of its inhabitants are jeopardised in the near term.
- **Medium Priority:** widespread and/or ongoing repeated grievance, for example, noise during construction or a local, isolated, or ‘one-off’ grievance that may affect the interests of an individual, or household to the extent that livelihoods are jeopardised in the near term; and

- **Low Priority:** a local, isolated, or ‘one-off’ grievance with no significant reputational or livelihood implications.

#### **4.5.4 Acknowledgement**

Upon submission of a grievance, regardless of the method used, complainants will be sent a letter of acknowledgement within 48 hours informing them that their grievance has been received and logged. Oral acknowledgement will be provided, where appropriate, and information will be provided on the course of action to be followed, an indicative timeframe for resolution, and contact details of the person within EAPP-PIU/MoEM-PIU assigned to deal with the grievance (Step 2).

#### **4.5.5 Investigation**

Following assignment of a grievance an investigation will be conducted into the grievance, during which field investigation as well as consultation with the complainant and EAPP-PIU/MoEM-PIU representatives may be carried out. The assigned individual or team will identify action(s) to resolve the grievance as appropriate (Step 3).

#### **4.5.6 Communication of Resolution and Request for Feedback**

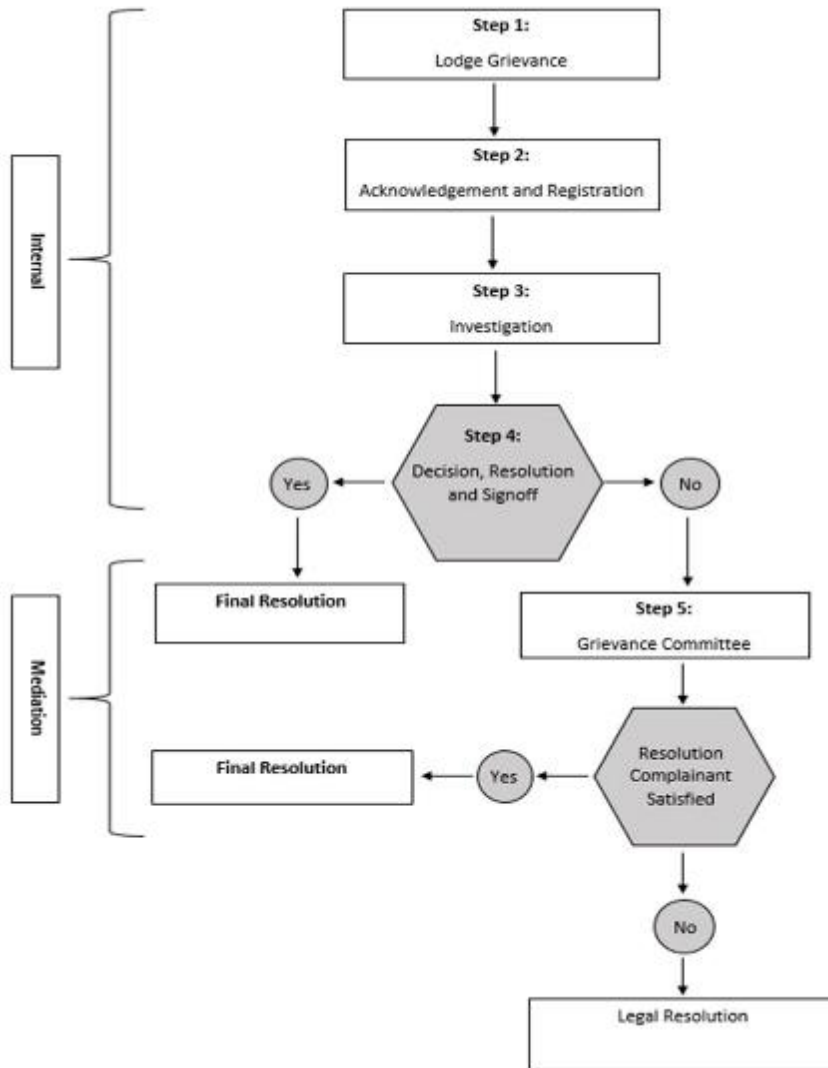
The secretary of the GRC will communicate the outcome of the investigation to the complainant and request feedback on the proposed action to close out the grievance. All grievances must be responded to within 5 working days of being received, even if the response is just a summary of what is planned and when it is likely to be implemented, or an explanatory note clarifying why action is not required. The response must be in writing, though a verbal response will also be provided where appropriate. If a grievance was submitted anonymously (for example, through a grievance box), the designated persons will make public the results of the investigation and the proposed course of action. All actions will be logged in the grievance database. A proposed action to resolve a grievance must be conveyed to the complainant within 30 calendar days of receipt of the grievance (Step 4). Complainants will be asked to give their response to the proposed action.

#### **4.5.7 Appeal**

If a resolution cannot be achieved, the complainant can appeal to the GRC (Step 5).

#### **4.5.8 Grievance Resolution and Close-Out**

When specific actions are agreed upon by EAPP-PIU/MoEM-PIU and the complainant, the social specialists in EAPP-PIU and MoEM/PIU will be responsible for ensuring that these corrective actions are implemented and effective at resolving the grievance. If no further action is required, then the social specialists in the PIU and the complainant will close the grievance and record this action in the grievance database. The MoEM/PIU and the complainant will both sign a closure form. If the complainant rejects a decision of the Grievance Committee, then recourse to judicial or administrative procedures remains open to the complainant (legal or administrative resolution of the grievance). Also, in case this mechanism will not allow an amicable agreement to be reached, the complainant or the defendant can resort to Justice (and could at any time).



**Figure 4-1: Grievance Mechanism Procedure**

#### **4.6 GBV (SEA/SH) GRM**

There will be a separate reporting and documentation mechanisms for GBV (SEA and SH) cases that are discrete from the standard GRM, that will be utilized by survivors or their representatives, to ensure all GBV cases are reported and handled confidentially. PAPs and all workers/staff will be made aware of these mechanisms through awareness sessions and staff inductions respectively. MoEM-PIU and EAPP-PIU social experts supported by the social expert from the contractor’s end will be the focal point and will establish the system to handle these complaints that will include reference to confidentiality, safety, and survivor-centered approach. All registration of the data will be confidential and anonymized.

#### **4.7 Somalis Customary Law of Xeer**

The Somali community uses traditional customary law as means of resolving dispute over natural resources grazing lands and homicide. This customary law is known as Xeer

(pronounced Herr). It is the indigenous conflict resolution tradition of the Somali people, with this tradition elders play preponderant roles as judges and assist arbitrated cases employing precedents. Based on the tradition when a conflict arises between two clans, mediators nominated from a third clan and the case presented to them. The elders thoroughly investigate the case and passes decision and the guilty pay compensation depending on the crime he committed. Homicides are usually solved through the penalty of blood compensation in terms of camel. Normally the courts simply formalize the decision reached by the traditional elders.

Based on the Xeer tradition if a clan member proved guilty and obliged to pay compensation in the form of Camel or in money, it is the duty of all the clan members to share equally and pay the compensation. This helping each other tradition considered as a guarantee for clan members to share their happiness and sorrow together. Once the conflict between two clan members solved in such manner, the hostility will no longer continue, or no vengeance passes to next family members. However, if the case presented only to the court and no compensation paid the victim hostility will continue to next family members. If the conflict is with other neighboring clan group the conflict, should go to the court and the dispute settled under the Sharia law based on the Quran as in most cases the conflict resolved with the court compensation may not be paid and there is a possibility that the dispute may arise again. However, if both agree to solve the conflict under customary law the conflict will be solved with similar compensation process and peace will be sustained. The Xeer as a conflict resolution and grievance redress mechanism will be used in the project area at any time by the local communities to resolve disputes arising from the project if they so wish. The project will not impose a certain method against the Xeer and will respect the use of this traditional system as an alternative dispute at any time if chosen and preferred by the local communities.

## **4.8 External Grievance**

### **4.8.1 World Bank Grievances Redress Service**

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed. Complaints must be in writing and addressed to the GRS and sent through the following methods namely: Those aggrieved, or their representatives can report their complaints through the following mediums; (i) Online by accessing the online form; (ii) Sending an Email to [grievance@worldbank.org](mailto:grievance@worldbank.org); or (iii) Submitting a letter to the World Bank Headquarters in Washington D.C., United States or World Bank Ethiopia County Office.

### **4.8.2 World Bank Inspection Panel**

The Inspection Panel is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a World Bank-funded project. The Panel is an impartial fact-finding body, independent from the World Bank management and staff, reporting directly to the Board. The Inspection Panel process

aims to promote accountability at the World Bank, give affected people a greater voice in activities supported by the World Bank that affect their rights and interests, and foster redress when warranted. In September 2020, the Board updated the resolution that created the Panel and added to the Panel functions. At the same time, the Board approved a resolution establishing the World Bank Accountability Mechanism (AM). The new AM began operations in early 2021 and houses the Panel to carry out compliance reviews and a new Dispute Resolution Service (DRS), which will give complainants another way to have their concerns addressed. Contacts for registration of complaints to the IP are listed below. Tel: +1 202 458 5200: Email: [ipanel@worldbank.org](mailto:ipanel@worldbank.org).

## 5 RESOURCES AND RESPONSIBILITIES

The overall oversight responsibility for implementing this SEP lies with the EAPP-PIU and MoEM-PIU.

### 5.1 EAPP-PIU

A Project Implementation Unit (PIU) has been established in the Eastern African Power Pool (EAPP) and is staffed by personnel (environmental and social specialist) who will be in charge of ensuring that the SEP is implemented in accordance with the World Bank ESSs. The EAPP/PIU will be responsible for the following:

- Provide oversight and ensure that MOEM-PIU implements the SEP
- Ensure adequate recording of stakeholder comments and existence of a clear auditable ‘trail’ showing the comments, their source.
- Reporting to the World Bank on the progress on implementation of SEP

### 5.2 MoEM-PIU

The PIU of the MOEM will be established and staffed by personnel who will be in charge of ensuring that the SEP is implemented. The MoEM-PIU will be responsible for the following:

- Reporting (monthly) to EAPP-PIU on progress on implementation of SEAP
- Implementing this SEP to its direct workers
- Monitor supervising engineers and contractors to ensure that they implement stakeholder engagement activities in compliance with this SEP.
- Ensure that the grievance mechanism for the project is implemented and functional in line with SEP

### 5.3 Staffing

EAPP-PIU and MoEM-PIU will each appoint the social specialists as the focal persons within their institutions to have overall responsibility for the operational management of SEP implementation, including the grievance mechanism and will have day-to-day responsibility for managing the grievance mechanism procedure. They will be assisted by other resources within the PIU including Environmental Specialist and GBV Specialist. Key tasks to be undertaken by EAPP-PIU/MoEM-PIU personnel are:

- Assisting in reviewing information disclosure materials and timely issuance of approvals for their disclosure;
- Providing timely approvals for allocation of resources for printing and distribution of disclosure materials;
- Sending formal written invitations to workshops and other stakeholder events;
- Identifying and organising meeting/event venues with appropriate technical and welfare facilities and providing refreshments (as considered necessary);
- Arranging and managing transport for selected stakeholders (limited to certain Affected Community stakeholders) so that they can attend meetings/events;
- Provision of responses to comments from members of the public, government authorities, media and NGOs;
- Grievance mechanism administration;
- Managing information for disclosure (with periodic updates) on PIU’s website;

- Collation and analysis of all stakeholder comments/concerns received via email or via website and reporting to senior management;
- Collation and analysis of grievances received and reporting to senior management; and
- Monthly reporting on SEP implementation progress to senior management.

The EAPP-PIU/MoEM will establish a stakeholder database that includes details of key stakeholders, their participation in ESIA consultations processes and issues raised. The database will be designed to allow information to be assembled, collated, and analysed. The stakeholder database is a dynamic tool that will be revised and updated, as necessary, to enable it to be used in the project construction phase, should the necessary approvals for the Proposed Project be obtained. A report of the stakeholder engagement process will be prepared. This report will present the disclosure and consultations activities conducted; levels of stakeholder participation, particularly for women and vulnerable groups; the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESIA Report. This account will be inserted as a chapter entitled ‘Stakeholder Identification and Engagement’ in the ESIA report.

#### 5.4 Estimated Budget

The estimated budget for the implementation of the SEP is \$150,000, specific activities will be submitted to EAPP-PIU and MoEM in time for approval before the activities are conducted. The budget estimates are provided in table 5-1.

**Table 5—1 Budget Estimate**

Activity	Cost (USD)
<b>Planning Meetings</b>	
Consultations/participatory planning/ Decision-making	<b>10,000</b>
<b>Staff Salaries</b>	
Travel/consultants/communication/office	<b>50,000</b>
<b>Communication/Awareness Campaigns</b>	
Fliers, brochures, radio and TV announcements, social media campaigns	<b>50,000</b>
<b>Capacity Building</b>	
GBV/SEA; OHS; environmental awareness	<b>10,000</b>
<b>Grievance Mechanism</b>	
Training of GRC Logistics for GRC meetings (venue, transport, communication materials) etc.	<b>10,000</b>

## 6 MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder engagement process are important elements to ensure that EAPP-PIU/MoEM-PIU's are able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. A series of key performance indicators is presented in Table 6-1 and performance against the indicators will show the extent of successful completion of stakeholder engagement commitments. SEP reporting will include the following:

- Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Action Plan, Resettlement Policy Framework (RPF), or SEA/SH Prevention and Response Action Plan, SRAMP, LMP if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees will also be annexed to the monitoring reports.

**Table 6—1: Key Performance Indicators**

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p><b>GM.</b> To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> <li>• Are project-affected parties raising issues and grievances?</li> <li>• How quickly/effectively are the grievances resolved?</li> </ul>	<ul style="list-style-type: none"> <li>• Usage of GM and/or feedback mechanisms</li> <li>• Requests for information from relevant agencies.</li> <li>• Use of suggestion boxes placed in the villages/project communities.</li> <li>• Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame.</li> <li>• Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral</li> </ul>	<p>Records from the implementing agency and other relevant agencies</p>

		<p>process in place. (if applicable)</p> <ul style="list-style-type: none"> <li>Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.</li> </ul>	
<p><b>Stakeholder engagement impact on project design and implementation</b></p> <p>How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> <li>Was there interest and support for the project?</li> <li>Were there any adjustments made during project design and implementation based on the feedback received?</li> <li>Was priority information disclosed to relevant parties throughout the project cycle?</li> </ul>	<ul style="list-style-type: none"> <li>Active participation of stakeholders in activities</li> <li>Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties.</li> <li>Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation.</li> <li>Number of disaggregated engagement sessions held, focused on at-risk groups in the project.</li> </ul>	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>
<p><b>Implementation effectiveness.</b></p> <p>Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> <li>Were the activities implemented as planned? Why or why not?</li> <li>Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of SEP activities implemented.</li> <li>Key barriers to participation identified with stakeholder representatives.</li> <li>Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion, and effectiveness.</li> </ul>	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

## 6.1 Reporting

The SEP will be revised and updated as necessary during project implementation. The social specialists in the EAPP/PIU and MoEM-PIU responsible for implementation of this SEP will prepare on a quarterly basis summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions and referred to the project managers. Reporting back to stakeholders will be via avenues and mechanisms highlighted in table 3-1 and will be done as elaborated in the Environmental and Social Commitment Plan (ESCP).

# 7 APPENDIX

## 7.1 APPENDIX I. GRIEVANCE FORM

<b>Concern/Complaint Reference Number (for Company use only):</b> .....	
Full Name of individual or organization/community (an individual's name to be inserted if complainant agrees) <sup>5</sup>	
<b>Contact Information:</b> Please indicate by marking the box how you wish to be contacted (in person, by telephone/SMS, by e-mail, by post) and then provide the appropriate contact information	By Post: Please provide full address:
	By Telephone/SMS:
	By E-mail
	In person: Please provide name of village
Preferred language for communication	English:..... Local Language:.....
Description of your concern/complaint:	What happened? Where did it happen? Who did it happen to? What has been the consequence for you?
Frequency of cause/s of your concern/complaint	
	Single incident (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve your concern/complaint?	
Signature	Date

<sup>5</sup> A concern or complaint can be submitted anonymously.

## 7.2 APPENDIX 2. EXAMPLE OF KEY DATA TO BE RECORDED IN A GRIEVANCE REGISTER

Example of Key Data to be Recorded in a Grievance Register							
Grievance ID	Name/address	Concern or complaint	Response mechanism	Answer	Status	Response accepted (yes/ no?)	Appeal decision accepted (yes/ no?)
Format as year.mm.dd and concern/ complaint number (e.g. 17.05.26: #01)	Insert name and address of the person submitting a concern or complaint (if provided)	Summary of the concern or	Personal letter, e-mail, telephone call/ SMS, orally backed up by letter, information board announcement.	Summary of the response	Date of response, identify whether the grievance is addressed and closed	Yes/ No	Yes/ No

## 7.3 APPENDIX 3. GRIEVANCE TRACKING AND CLOSE-OUT FORM

REGISTRATION DETAILS
COMPLAINT REGISTRATION No. _____ (No. to be taken from complaints log)
<b>DATE RECEIVED</b> _____
<b>LOCATION</b> _____ (Village, District, Region)
Complainant (Name) _____
Telephone Number _____
Address (If Applicable) _____
PART 2: GRIEVANCE DESCRIPTION
Category of grievance (please circle the appropriate category) <ul style="list-style-type: none"> <li>• Property (built structures) damage.</li> <li>• Land encroachment.</li> <li>• Access restriction</li> <li>• Damage to land/crops</li> <li>• Damage to livestock</li> <li>• Water availability/quantity (e. g. supply disruption)</li> <li>• Water quality (e.g. pollution)</li> <li>• Noise/air quality (including dust)</li> <li>• Resettlement/valuation/compensation</li> <li>• Traffic/vehicle behaviour (e. g. speeding)</li> <li>• Other (Specify)</li> </ul>
<b>Details of Grievance:</b> _____ _____ _____
Priority of Grievance (please circle as appropriate) <ul style="list-style-type: none"> <li>• Critical</li> <li>• Medium</li> <li>• Low</li> </ul>
PART 3: PROPOSED RESPONSE/ CORRECTIVE ACTION
Immediate Action: _____
Date for Completion: _____
Responsible Person: Signature Date:
Long term Action
Date for completion

Responsible Person:

Signature

Date:

Other resolution details

**PART 4: VERIFICATION OF CORRECTIVE ACTION**

Follow up details (If applicable)

Closed out (Yes/No) :

**Signatures:**

Complainant: \_\_\_\_\_

Institution: \_\_\_\_\_

(Date)

## 7.4 APPENDIX 4. STAKEHOLDERS IDENTIFIED

Stakeholder Categories	Stakeholder Level	Stakeholders
<b>Government</b>	National, regional, and local government	<ul style="list-style-type: none"> <li>■ Local government/municipalities/regional government</li> <li>■ Relevant government departments at member state level</li> </ul>
<ul style="list-style-type: none"> <li>■ Ministry of Energy and Minerals</li> <li>■ National Environment Research and Disaster Preparedness Authority (NERAD).</li> <li>■ Ministry of Employment Social Affairs and Family</li> <li>■ Ministry of Agriculture and Development</li> <li>■ Somaliland Roads Development Authority</li> <li>■ Ministry of Environment and Climate Change</li> <li>■ Ministry of Civil Aviation and Air Transport</li> </ul>		

### Civil Society Organizations

Country	Civil Society Organizations
Somaliland	Youth Volunteers For Development & Environment Conservation Barwaago Voluntary Organization Development Intervention and Welfare Organization General Assistance Voluntary Organization National Women’s Network Somaliland National Youth Organization Somaliland Women’s Research and Action Group (WORDA) Women rehabilitation and Development Association Candlelight for Health and Education Islamic Relief – Hargeisa Women’s Rescue Society Marwaad Women’s Development Dulmar for Development, Advocacy and Peace United Nations Population Fund UNICEF Somaliland Horn of Africa Relief and Development Organization

### Media

Country	Media
Somaliland	<ul style="list-style-type: none"> <li>■ Radio Hargeysa</li> <li>■ Somaliland National TV (SNTV)</li> <li>■ Kalsan TV</li> <li>■ MMTV</li> <li>■ Horn Cable</li> <li>■ SaabTV</li> <li>■ ABC TV</li> <li>■ True Cable TV</li> <li>■ Star TV.</li> </ul>

## 7.5 APPENDIX 5. STAKEHOLDERS CONSULTED

### Somaliland National Level Stakeholder Consultations

DATES	VENUE	NO. OF PARTICIPANTS	NO. OF MALES	NO. OF FEMALES
10 <sup>th</sup> January 2024	Director of Energy, MoEM	1	1	0
10 <sup>th</sup> January 2024	Ministry of Employment, Social Affairs and Family	1	1	0
11 <sup>th</sup> January 2024	Ministry of Agriculture Development (MoAD)	1	1	0
9 <sup>th</sup> January 2024	Ministry of Environment and Climate Change	1	1	0
13 <sup>th</sup> January 2024	National Energy Commission	2	2	0
9 <sup>th</sup> January 2024	Municipality of Hargeisa; Director of Disaster Risk Management and Social Affairs.	1	1	0
9 <sup>th</sup> January 2024	Gabiley Municipality Social Service Director	1	1	0

### Somaliland Village Level Stakeholder Consultations

DATES	VENUE	NO. OF PARTICIPANTS	NO. OF MALES	NO. OF FEMALES
14/01/2024	Community in Idinka Deerayahan	23	17	6
15/01/2024	Community in Burcadda Village	16	10	6
18/01/2024	Community in Haamas Village	18	11	7
13/03/2024	Community - Laaya Village	20	16	04
13/03/2024	Community - Sheikh Mohamed Yare Village	24	19	05
13/03/2024	Community - Dhagahyo-Ad Village	32	21	11
13/03/2024	Community - Godka Village	21	13	08
14/03/2024	Community - Magaalo-Hoodaal Village	30	17	13
14/03/2024	Community - Tin'ad Village	27	16	11
14/03/2024	Community - Da'arta Village	21	11	10
16/03/2024	Community - Lafta Faraweyne Village	18	15	03
16/03/2024	Community - Aw Barre Village	20	11	09
17/03/2024	Community - AW-Barkhadle Village	14	11	03
17/03/2024	Community - Da'arbudhuq Village	27	20	07
17/03/2024	Community - Xabaalo Tumaalood Village	17	06	11
18/03/2024	Community - Sheikh Moodhle Village	22	16	06

18/03/2024	Community - Shirwareen Village	21	12	09
19/03/2024	Community - Jibaaqe Village	14	09	05
20/03/2024	Community - Galoole Village	21	13	08
20/03/2024	Community - Maadh-Yaal Village	18	13	05
21/03/2024	Community - Markazka-Burcada Yar	21	16	05
23/03/2024	Community - Lafaruug Village	33	20	13

## 7.6 APPENDIX 5. SELECTED PHOTOS OF STAKEHOLDERS CONSULTED







