



# STAKEHOLDER ENGAGEMENT PLAN

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## **ACKNOWLEDGEMENT:**

This Stakeholder Management Plan is a living document. It has been developed under the inspiration of AECOM that drafted the Grievance mechanism for GSEZ Airport project.

This document is the Stakeholder Engagement Plan (SEP) for Nkok Special Economic Zone (NSEZ). This SEP presents the approach to planning and managing stakeholder engagement activities during the operation phase. This is a live document that will be periodically updated as the activities evolve. It will be updated and implemented as part of the Environmental and Social Management Plan (ESMP). The current document presents Version 1 of the SEP.

## **1. INTRODUCTION**

### **1.1 PURPOSE**

This SEP details the site's activities related to engaging stakeholders and making the most effective use of their participation. Stakeholder engagement includes the processes required:

- to identify people, groups and neighbouring projects or businesses that could affect or be affected by the project;
- to analyse stakeholder expectations and their impact(s) on the site;
- to develop appropriate strategies and tactics for effectively engaging stakeholders in a manner appropriate to the stakeholders' interest and involvement in the site operations.

This is essential for the building of a long term social license to operate in order to facilitate the successful evolution of the site activities.

Stakeholders include local communities directly affected by the operation activities and other stakeholders not directly affected but that have an interest in these activities. These could include national and local authorities, neighbouring projects/businesses, and/or non-governmental organisations (IFC, 2012).

The SEP aims to establish the process and tools to:

- Maintain an active list of stakeholders, keep a lead on their perceptions about NSEZ activities, and identify and record key issues and concerns that stakeholders have about them.
- Keep stakeholders informed about NSEZ activities, explaining its current nature and any changes that could generate new impacts or increase existing ones, and opportunities for grievance and engagement.
- Avoid any misunderstandings about NSEZ activities and properly manage expectations.
- Build positive relationships and ensure ongoing stakeholder participation.
- Implement a viable grievance mechanism using a Stakeholder Consultation and Grievance Management System (SCGMS) and grievance boxes.

### **1.2 SCOPE**

NSEZ activities do not represent the end of all relationships with the stakeholders associated with the extension of the Special Economic Zone. Indeed, it is the will of the NSEZ teams to maintain a close link with the stakeholders through the undertaking of official yearly meetings

focusing in particular on local communities and stakeholders directly concerned with their activities, such as neighbouring institutional, commercial and industrial activities as well as national and local authorities and NGOs.

The consultation process will be designed to meet the requirements for public consultation as prescribed in Gabon's Environmental Regulations (2014) and the International Finance Corporation (IFC) Performance Standard 1 and guidelines for stakeholder engagement.

This SEP has been specifically developed for the NSEZ site.

NSEZ will also engage with various businesses, regulators and government departments as part of its commercial negotiations and planning, marketing and promotion.

### 1.3 PRINCIPLES OF STAKEHOLDER ENGAGEMENT

The Project will apply the following principles of stakeholder engagement:

- The engagement strategy will be in line with the needs of the site operations and stakeholders, and tailored to the operations associated risks and context.
- Engagement will include disclosure, consultation, and long-term and ongoing relationship building (e.g., through E&S Manager or alternatively community liaison officers (if any)).

Engagement will:

- Be a two-way dialogue involving informing and listening, as well as sharing and exchanging views.
- Be transparent, proactive and objective.
- Take into account local events, practices, and traditions in terms of timing of consultation activities.
- Take into account cultural sensitivities, roles of men and women, literacy levels, and community leadership structures.
- Be free of intimidation and coercion.
- NSEZ will consider incorporating feedback from stakeholder engagement to improve operations with regards to stakeholder's expectations.
- NSEZ will use the SCGMS to document disclosure and consultation activities, both in terms of the process and the results of the consultation.

## 2. TERMS AND DEFINITIONS

<b>ABBREVIATION</b>	<b>DESCRIPTION</b>
ANUTTC	Agence Nationale de l'Urbanisme, des Travaux Topographiques et du Cadastre
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
DGEPN	Direction Générale de l'Environnement et de la Protection de la Nature
E&S	Environment and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GIIP	Good International Industry Practice
GSEZ	Gabon Special Economic Zone
HSE	Health, Safety and Environment
IFC	International Finance Corporation
NGO	Non-Governmental Organisation
NSEZ	Nkok Special Economic Zone
O&M	Operations and Maintenance
PAC	Project Affected Community
PS	Performance Standard
RAP	Resettlement Action Plan
SCGMS	Stakeholder Consultation and Grievance Management System
SEP	Stakeholder Engagement Plan
TEREA	Terre Environnement Aménagement
ToR	Terms of Reference

<b>TERM</b>	<b>DEFINITION</b>
Consulta- tion	A two-way process through which views and information are exchanged between the proponent and stakeholders.
Disclosure	The provision of relevant and adequate project information to enable stakeholders to understand the risks, impacts and opportunities of NSEZ activities.

Engage-ment	Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities.
Grievance Mechanism	A mechanism to receive and facilitate resolution of affected communities' concerns and grievances regarding environmental and social issues. The mechanism should be clearly communicated to communities and should not impede judicial review.
Vulnerable Groups	Individuals or groups who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to ethnicity, gender, language, religion, political views, dependence on natural resources, sickness or disability or other factors.



### 3. ROLES AND RESPONSIBILITIES

This section presents the organisational structure that will be in place to implement this SEP. Key participants in the management of stakeholder engagement include:

- NSEZ Business Head;
- NSEZ O&M Head;
- NSEZ HSE team;
- NSEZ E&S Manager
- GSEZ Corporate Environment and Social Performance Lead;
- GSEZ Corporate Government Relations (as required);
- GSEZ Corporate Communication (as required).

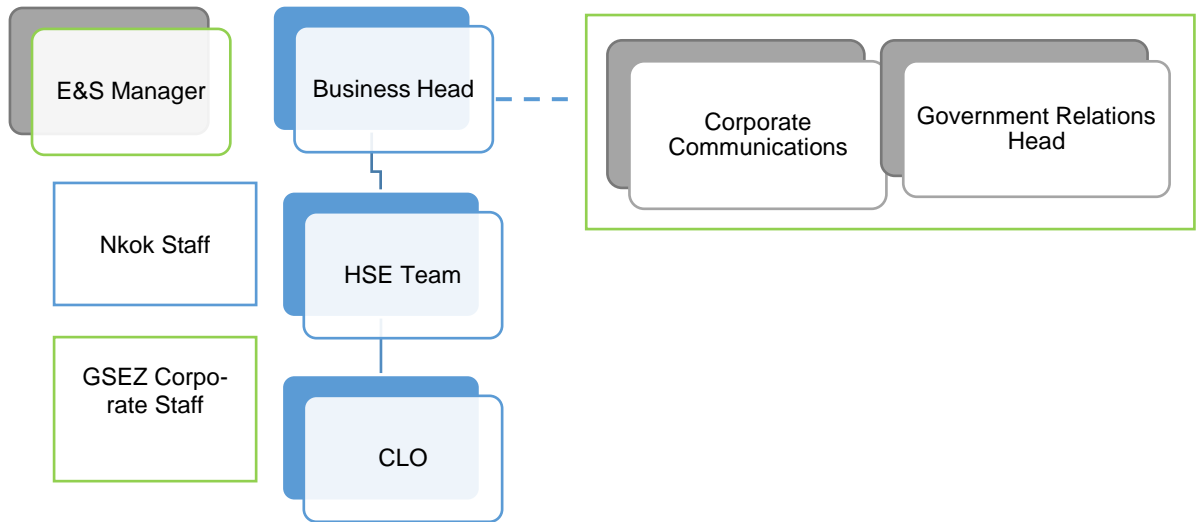
Table 1 sets out key roles and responsibilities to manage stakeholder engagement. Roles and responsibilities are likely to change as the site's activities evolve.

**Table 1: Key roles and responsibilities**

Title	Role	Responsibilities
NSEZ Business Head	<ul style="list-style-type: none"> <li>Responsible for overall Nkok activities and business</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring that the stakeholder engagement strategy is communicated internally and that the staff, resources and systems are in place to enable the strategy and this SEP (including Grievance Mechanism) to be implemented.</li> <li>Ensure coordination and consistency across all stakeholder facing activities by all parties.</li> <li>Sign-off on any media communications.</li> <li>Sign-off on any publicly disclosed project information.</li> <li>Ensure relevant NSEZ staff are briefed in a timely and consistent way about the SEP.</li> <li>Reviews SEP activities and outcomes and, where necessary, reports issues of concern to GSEZ Corporate E&amp;S Head, GSEZ Corporate Government Relations, and/ or GSEZ Head of Corporate Communications.</li> <li>Participates in yearly SEP monitoring and evaluation review meeting.</li> </ul>
NSEZ O&M Head	Responsible for overall site Operation and Maintenance activities	<ul style="list-style-type: none"> <li>Ensure that all operation and maintenance employees are informed on the SEP and most specifically on the Grievance mechanism.</li> <li>Give support to Business Head and HSE team in the preparation of stakeholder meeting by providing required information on operation and maintenance activities.</li> <li>Participates in yearly SEP meetings as required.</li> </ul>
HSE Team	The HSE Team will act as liaison between NSEZ and all stakeholders in terms of Health and Safety and all associated matters.	<ul style="list-style-type: none"> <li>The HSE team will work supported by Community Liaison Officers (if any) and act as a focal point for communications between local stakeholders.</li> <li>Liaising on an on-going basis with the Business leads (Maintenance, Operation, Project, Commercial), focusing on potential forthcoming disturbances and restrictions that may potentially affect project stakeholders.</li> </ul>

NSEZ E&S Manager	Leads the development of and oversees implementation of NSEZ's environmental and social governance framework, and manages the implementation and monitoring of the SEP and Grievance Mechanism.	<ul style="list-style-type: none"> <li>• Periodic review of SEP to ensure it aligns with GSEZ's corporate social standards.</li> <li>• Provides senior guidance and advice on stakeholder engagement strategy as needed.</li> <li>• Participates in yearly SEP monitoring and evaluation review meeting, as required.</li> <li>• Report feedback received from stakeholders to the E&amp;S Corporate Head and NSEZ Business Head.</li> <li>• Communicate the Grievance Mechanism and oversee training to community representatives, site management, staff and sub consultants, as appropriate</li> <li>• Document all stakeholder engagement activities in the SCGMS.</li> <li>• Provide reports to the E&amp;S Corporate Head and NSEZ Business Head regarding engagement and grievances.</li> <li>• Lead yearly SEP monitoring and evaluation review meeting.</li> <li>• Planning, implementing and conducting the management of stakeholder engagement including periodic update of the SEP, as required.</li> <li>• Record grievances received by stakeholders and follow Grievance Mechanism procedure to allow their resolution.</li> </ul>
GSEZ Corporate Government Relations	Point of liaison between NSEZ and Government stakeholders (as required)	<ul style="list-style-type: none"> <li>• Advises on any government-focused aspects of stakeholder engagement.</li> <li>• Participates in consultations with government stakeholders where required.</li> <li>• Participates in yearly SEP monitoring and evaluation review meeting, if required.</li> </ul>
GSEZ Corporate Communications	Support NSEZ in its communications strategy (as required)	<ul style="list-style-type: none"> <li>• Periodic review of SEP to ensure it aligns with GSEZ's wider corporate communications strategy.</li> <li>• Participates in yearly SEP monitoring and evaluation review meeting, if required.</li> </ul>

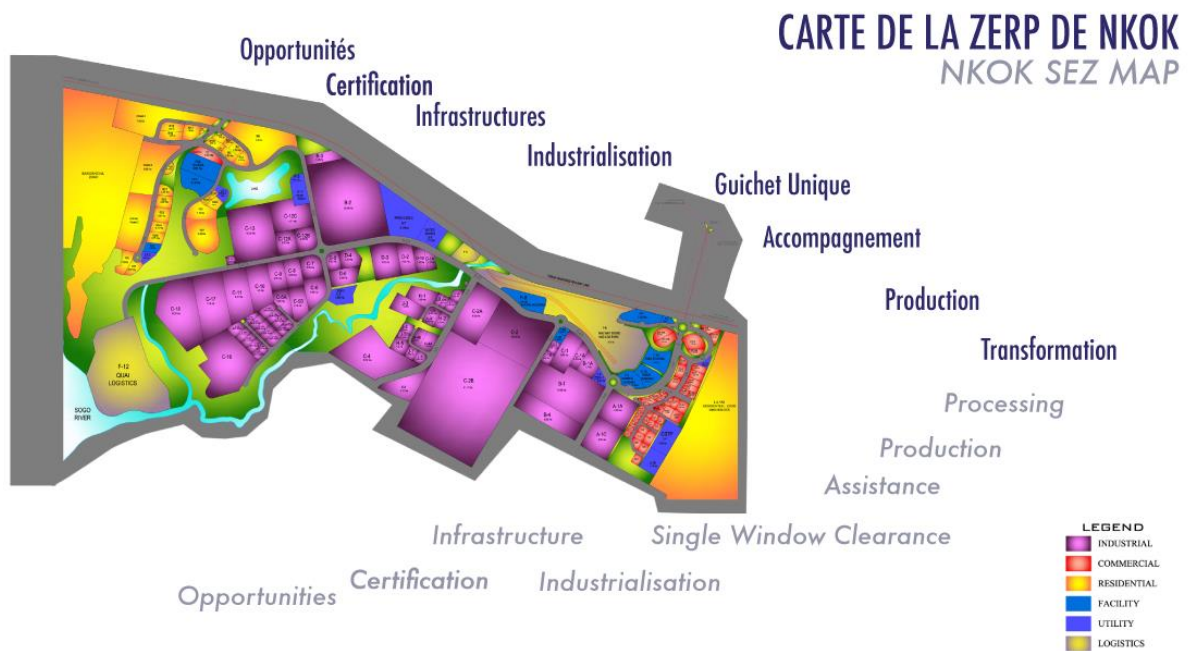
**Figure 1: Stakeholder Engagement: Organisational Chart**



#### 4. PROJECT BACKGROUND

NSEZ is a component of GSEZ SA, a private-public partnership between the Republic of Gabon (38.5%), Olam International and African Finance Corporation. GSEZ SA is a registered Gabonese company established in 2010.

Figure 2: NSEZ Map





## **5. REGULATIONS AND REQUIREMENTS**

NSEZ is committed to complying with Good International Industry Practice (GIIP) as set out in the IFC Performance Standards (IFC PSs) as well as national Gabonese legislative requirements. Requirements for public consultations are prescribed in Gabon's Environment Code (Law No. 007/2014 dated 1 August 2014) and in IFC PS1 and guidelines for stakeholder engagement. There are no national requirements for stakeholder engagement beyond those relating to the ESIA. The IFC Performance Standards are therefore regarded as directing the scope of this SEP.

### **5.1 IFC REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT**

The IFC sets out requirements for undertaking stakeholder engagement throughout a Project lifecycle including at operation phase, in IFC PS1 - Assessment and Management of Environmental and Social Risks and Impacts (IFC, 2012). Further guidance is available in Good Practice Manual: Doing Better Business through Effective Public Consultation (IFC, 1998) and Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (IFC, 2007). A summary of IFC PS1 engagement requirements is presented in Table 2.

### **5.2 CORPORATE COMMITMENTS**

GSEZ does not have specific corporate policies or guidelines on stakeholder engagement currently in place. GSEZ corporate responsibility and sustainability initiatives include understanding the operational impacts of its operations on the environment through energy, carbon, air quality and freshwater analysis, and assessing the impact of programmes on the community, the workplace and the environment.

**Table 2: Stakeholder engagement requirements of IFC PS 1**

Issues	Requirements
<b>Stakeholder analysis and planning</b>	<ul style="list-style-type: none"> <li>• Identify affected stakeholders, including vulnerable groups<sup>1</sup></li> <li>• Develop and implement a Stakeholder Engagement Plan</li> </ul>
<b>Disclosure of information</b>	<ul style="list-style-type: none"> <li>• Provide stakeholders with access to information on:               <ul style="list-style-type: none"> <li>○ Purpose, nature and scale of the operations</li> <li>○ Any risks, potential impacts and mitigation measures</li> <li>○ Proposed stakeholder engagement process</li> <li>○ Grievance Mechanism</li> </ul> </li> </ul>
<b>Consultation</b>	<ul style="list-style-type: none"> <li>• Consultation will be in line with the degree of potential operation's impacts and will:               <ul style="list-style-type: none"> <li>○ Be implemented early in the operation stage and repeated regularly and as required</li> <li>○ Be based on prior disclosure and dissemination of information</li> <li>○ Focus on those directly affected</li> <li>○ Be free of outside interference and external manipulation</li> <li>○ Enable meaningful participation</li> <li>○ Be documented</li> </ul> </li> </ul>
<b>External communications</b>	<ul style="list-style-type: none"> <li>• Implement and maintain a procedure for external communications that:               <ul style="list-style-type: none"> <li>○ Registers communication</li> <li>○ Screens and assesses issues raised</li> <li>○ Tracks and documents responses</li> <li>○ Adjusts the management programme</li> </ul> </li> </ul>
<b>Grievance Mechanism for Project Affected Communities</b>	<ul style="list-style-type: none"> <li>• Establish a Grievance Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the operation activities.</li> <li>• The Grievance Mechanism should:               <ul style="list-style-type: none"> <li>○ Resolve concerns promptly</li> <li>○ Use a transparent and culturally appropriate consultative process</li> </ul> </li> </ul>
<b>Ongoing reporting to affected communities</b>	<ul style="list-style-type: none"> <li>• Provide periodic progress updates, specifically with regard to issues or grievances communities have raised</li> <li>• Communicate any updates to the management programme</li> <li>• Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually</li> </ul>

<sup>1</sup> Vulnerable stakeholders are defined as those who may be differently or disproportionately affected by the Project due to pre-existing disadvantaged status, or whose situation may mean that they are hard to reach, and/or require differentiated measures in consultation and disclosure activities to allow their effective participation.



## 6. PROJECT STAKEHOLDERS

### 6.1 OVERVIEW

A list of stakeholders will be identified and assessed through a process of 'stakeholder mapping'. Stakeholder mapping refers to a process of identifying stakeholders and understanding their influence and potential interest in relation to NSEZ operations so that tailored consultation approaches can be developed for each type of stakeholder, if required.

### 6.2 STAKEHOLDER IDENTIFICATION

Table 3 below provides the key stakeholder groups to date based on the initial list of stakeholders identified during community's meetings.

### 6.3 STAKEHOLDER MAPPING: ASSESSING STAKEHOLDER INTEREST AND INFLUENCE

Stakeholder interest is defined as the extent to which the interests of a stakeholder are affected by the activities of NSEZ either due to the activities direct impact on them or because of a political, financial, social, cultural, scientific or technical interest in these activities. These interests can be either positively or negatively affected leading to either an improvement or deterioration in a stakeholder's baseline conditions. Stakeholder interest is assessed by applying the definition in Table 4 that best fits the situation of the stakeholder.

NSEZ is located in the vicinity of the second administrative subdivision of Ntoun, whose boundaries of this district start from PK22 to PK23. It extends over 13 kilometers along the national road and covers an area of 80 square metres. The population is estimated at 10,000 inhabitants.

This community has 26 neighbourhoods, namely:

Nzogmitang-Centre, Nzogmitang Rail, Nzogmitang Carrière, Nzogmitang Messonga, Bissobinam Eglise, Nkok Oveng-Assi, Nkok Bengole, Nkok Nki, Nkok Metane, Nkok Messonga, Nkok Cité, Nkok Sôghe N'nki, Nkoltang Centre, Nkoltang Edoume-Assi, Nkoltang Ndjiabérré, Nkoltang Rail, Nkoltang Cité administrative, Nkoltang Mbil-Avong, Nkoltang Mitsaba, Nkoltang Nzogmitang, Ayeme-centre, Ayeme Zamata 1, Ayeme Zamata 2, Ayeme Ntô, Ayeme Elane and Ethnic groups include Fang, Sango, Punu, Eshira, Myènè, Bakota, Nzebi.

Foreign communities: Cameroonian, Equatorial Guinean, Congolese, Malian, Togolese, Ghanaian, Beninese, Burkina Faso nationals, Mauritanian, Ayeme-Maritime.

**Table 3: Stakeholder groups and Interests**

Group	Stakeholder	Interest level	Influence level	Required Engagement	Means of communication
National Authorities		High	High	In-depth	Specific reports, ad hoc/annual meetings, specific correspondence, Committees/Workshop, Grievance Management System, submission of ToR and ESIA
	DGEPN	Medium	High	In-depth	
	Single Window Clearance	High	High	In-depth	Ad hoc/annual meetings, website, correspondences
Land Registry	ANUTTC	High	High	In-depth	Grievance Management System, Committees/Workshops, Ad hoc/annual meetings.
Local Government for communities	Prefect of Ntoum, Mayor of 2 <sup>nd</sup> <i>Arrondissement</i> of Ntoum	High	High	In-depth	Public consultations, Annual meetings, Grievance Management System, Website, Leaflets, Information boards
Project Affected Communities	Essassa-Bissobinam, Essassa-Nzongmitang, Nkok	High	Low	Focused Engagement	Grievance Management System, Information boards, Leaflets, public consultations

**Table 4: Assessing stakeholder interest**

Interest Level	Definition
High	NSEZ activities potentially have a significant positive or negative impact on the interests of stakeholders. The impact is considered to be significant and the stakeholders are highly sensitive to the impact.
Medium	NSEZ activities potentially have a moderate positive or negative impact on the interests of stakeholders. The impact is considered to be medium and stakeholders are moderately sensitive to the impact.
Low	NSEZ activities potentially have a minor positive or negative impact on the interests of stakeholders. The impact is considered to be minor, and stakeholders are not considered sensitive to the impact.

Stakeholder influence refers to the power that a stakeholder has over NSEZ operation. Influence can be direct or indirect. Indirect influence derives, for instance, from a stakeholder’s ability to influence others or their access to important information. Formal influence may derive from their ability to directly affect decision making through, for example, the issue of government approval and permitting decisions.

Stakeholder influence is assessed by applying the definition in Table 5 that best fits the status of the stakeholder.

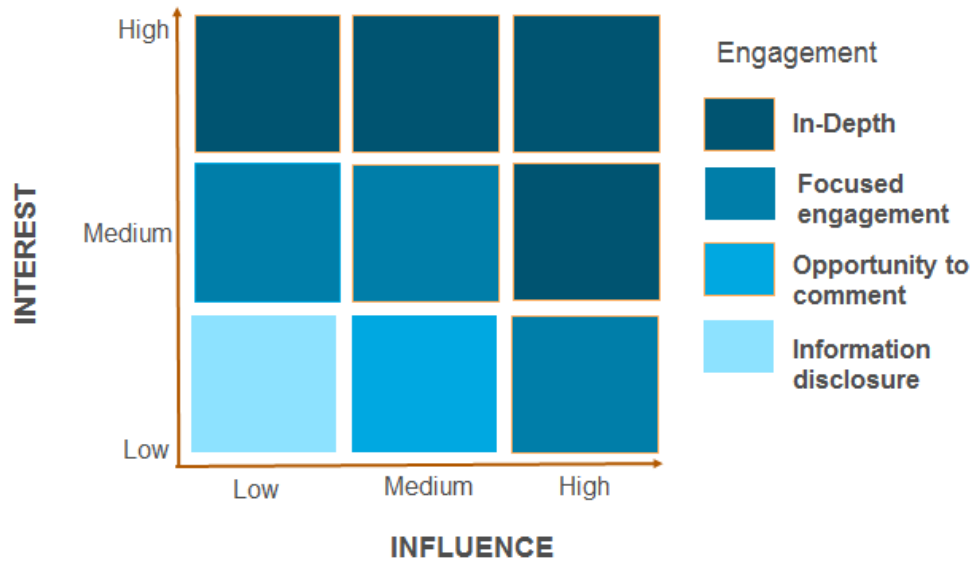
**Table 5: Assessing Stakeholder Influence**

Influence Level	Definition
High	The stakeholder or stakeholder group is considered highly influential and has the capacity to stop operations or significantly impact NSEZ’s reputation. For example, powerful civil society organizations (CSOs) and individuals who can affect the Project’s ‘social license’ to operate.
Medium	The stakeholder or stakeholder group is considered to have moderate influence and moderate capacity to influence NSEZ operations or impact its reputation. For example, lobby groups, NGOs and small associations.
Low	The stakeholder or stakeholder group is isolated and has limited capacity to exert influence over NSEZ operations or its reputation. For example, stakeholders who lack institutional and social legitimacy, lack awareness on NSEZ operations or have weak capacity. Isolated communities that are geographically distant are considered to have low influence; however, a group of these communities connected through associations and social media can be considered to have medium influence.

#### 6.4 STAKEHOLDER ANALYSIS MATRIX

Using the categorisation of impact and influence, a stakeholder analysis matrix (**Error! Reference source not found.**3) facilitates the development of an appropriate stakeholder disclosure and consultation strategy. The matrix attributes greater weighing to stakeholder interest than over their ability to influence NSEZ activities. This is so that stakeholders likely to have key interests affected by the operations are fully engaged, and that NSEZ is aware of their concerns. This also allows for vulnerable groups, which are often likely to have lower levels of influence, to be identified for higher levels of disclosure and consultation.

**Figure 3: Stakeholder analysis matrix**



The matrix outlines four levels of engagement, in ascending order:

- Information disclosure.
- Opportunity to comment.
- Focused engagement.
- In-depth engagement.

Higher levels of disclosure and consultation correspond to the provision of more detailed operation information and more in-depth discussion in relation to their impacts. Lower levels of disclosure and consultation represent more limited operation information and discussion, and are generally less technical and less specific in nature.

Stakeholders that have both high influence and high impact will be continuously engaged and kept fully informed throughout NSEZ operational phase. Those with high influence include both 'decision-makers' and 'opinion leaders'. Stakeholders that have low influence but high interest will also be kept well informed and involved in a process of informed consultation and participation, so that their views are taken into account in operation decision making.

The Stakeholder analytical table provides the detailed results of the stakeholder mapping exercise, including each stakeholder's assessed level of influence and interest in NSEZ operations, and their corresponding category for engagement.

The stakeholder database is a live document which should be updated throughout NSEZ lifecycle. It is important to note that a stakeholder's level of influence and interest may change as activities evolve.



## **7. STAKEHOLDER ENGAGEMENT METHODS & TOOLS**

### **7.1 INFORMATION DISCLOSURE AND CONSULTATION METHODS**

To allow information about NSEZ to be accessible to all stakeholder groups, information will be disclosed in a variety of ways. Table below describes the range of disclosure methods that could be used to disclose information and receive feedback about activities. All communication and disclosure material will be produced in a culturally appropriate manner, with French being the language for stakeholder consultations and communication materials.

### **7.2 PROTOCOLS FOR CONSULTATION AND ENGAGEMENT**

The stakeholder engagement team will meet with the local authorities including the Mayor of 2<sup>nd</sup> administrative subdivision of Ntoun and/or Assistants ahead of any consultations with local communities.

For engagement with national level stakeholders, invitations for meetings will be sent at least one week in advance and follow up phone calls with stakeholders made to confirm and schedule the meetings.

For all formal consultation activities undertaken with stakeholders (i.e. public hearings) minutes of meeting will be prepared, signed by attendees as appropriate and a record of the meeting will be kept in the Stakeholder Consultation and Grievance Management System for future reference.

Notification of public hearings and events must be made by sending letters (with sufficient notification time) to local authorities (Prefect, Mayor and neighbourhood chiefs) to request their support and assistance in mobilising local population to attend the meeting.

**Table 6: Information disclosure and feedback collection methods**

AIMS	TOOL/ TECHNIQUE	DESCRIPTION
<b>Disclosure of Information</b>	Website (operations phase)	<ul style="list-style-type: none"> <li>• Use as a means for disseminating NSEZ activities information for a wide range of stakeholders</li> <li>• Use as a means to regularly update stakeholders on key milestones</li> <li>• Use to disclose information on the Grievance Mechanism and contact information for stakeholders to lodge grievances</li> </ul>
	Letter	<ul style="list-style-type: none"> <li>• Use as a means to disseminate specific information</li> <li>• Use as a means to reach stakeholders who are less likely to participate in a public meeting</li> <li>• Use as a feedback mechanism to update stakeholders on how their comments and grievances have been considered</li> </ul>
	Media (Newspaper/ Radio/ TV)	<ul style="list-style-type: none"> <li>• Use as a means to reach a wide range of stakeholders</li> <li>• Use to announce upcoming public meetings.</li> <li>• Use to disclose information regarding employment, specific operational updates and physical changes associated with operational requirement</li> </ul>
	Project Leaflet	<ul style="list-style-type: none"> <li>• Poster and/or flyer to keep all stakeholders informed about NSEZ activities.</li> <li>• Use as a means to reach stakeholders who are less likely to participate in a public meeting</li> <li>• Use to explain the Grievance Mechanism</li> </ul>
	Committees	<ul style="list-style-type: none"> <li>• Regular Committee meetings</li> <li>• Use as a means for disseminating Project information to key stakeholders including government</li> </ul>
	Project information board	<ul style="list-style-type: none"> <li>• At main entry point of the site.</li> <li>• Use to announce upcoming public meetings.</li> <li>• Displays statutory notices (permits) along with the means of contacting NSEZ.</li> </ul>
<b>Engagement and Consultation</b>	Public Consultation	<ul style="list-style-type: none"> <li>• Use to disclose information to a wide range of stakeholders, as necessary.</li> <li>• Hosted by NSEZ with support of consultants as needed.</li> <li>• Not to be used as a sole means of information disclosure, but in combination with techniques that can reach less vocal stakeholders (e.g. notice boards, leaflets, media publications)</li> </ul>
	One-to-one Meeting	<ul style="list-style-type: none"> <li>• Use on a regular basis, or as appropriate, to build rapport between NSEZ and regulatory authorities, local authorities, NGOs, businesses, etc.</li> <li>• Use to build better understanding of individual stakeholder perspectives regarding the Project</li> </ul>
<b>Stakeholder Feedback</b>	Stakeholder Consultation and Grievance Mechanism System	<ul style="list-style-type: none"> <li>• Use as a means to register stakeholder consultations (past, present and future) and stakeholder grievances.</li> </ul>
	Grievance Form	<ul style="list-style-type: none"> <li>• Use as a means to register stakeholder grievances relating to the Project.</li> </ul>
	Comment Form	<ul style="list-style-type: none"> <li>• Distribute at meetings and use as a means for stakeholders to provide feedback, concerns and comments on the Project.</li> </ul>



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Feedback via govern-  
ment authorities

- Any relevant stakeholder feedback, including complaints, received by email, letter or phone by the Mayor's office or Neighbourhood Chief should be communicated back to NSEZ, as necessary.
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A set of materials will be used to support the stakeholder engagement process. These are provided in Appendix D and include:

Meeting Minutes template.

Attendance sheet.

## **8. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

No stakeholder engagement activity has been initiated by NSEZ so far.

## 9. PROPOSED STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities will essentially be of two types, that is public meetings and individual or limited group meetings.

### 9.1 PUBLIC MEETINGS

In order to comply with the ESMS requirements, NSEZ will conduct a yearly public meeting with the stakeholders identified in section 5, which will focus on the presentation of:

- the general activities realised;
- the changes/improvements made to the site and activities to reduce social and environmental risks;
- the review of the grievances received and their treatment;
- any other specific environmental or social issues that need to be discussed with the stakeholders.

The meeting, which will include a formal presentation and sufficient time for all stakeholders to express themselves on the subjects presented or on other subject related to the site's activities, will always be publicised in advance. The municipal and neighbourhood authorities will be informed and consulted to plan its organisation.

Minutes of the meeting, which will list all requests and observations made by the stakeholders and propose actions, as required, to try and resolve any raised issues, will be produced by the consultant.

### 9.2 INDIVIDUAL OR LIMITED GROUP MEETINGS

This specific type of meetings will be used to meet with stakeholders in order to discuss the resolution of a specific issue or grievance. Concerned stakeholders will be contacted to organise an official meeting at a date and hour which will be agreed by all and in location easily accessible by all. When the meeting is with community members, the municipal and/or neighbourhood authorities will be informed and/or invited according to the concerned stakeholder requirements.

Minutes of the meeting will be produced which will list all requests and observations made by the stakeholders and propose actions, as required, to try and resolve the issue discussed at the meeting.



## **10. GRIEVANCE MECHANISM**

In accordance with GIIP, NSEZ will establish a specific mechanism for dealing with grievances about its activities. A grievance is a complaint or concern raised by an individual or organisation who feels that they have been adversely affected by NSEZ activities. Grievances may take the form of specific complaints for actual damages or injury, general concerns about the site activities generating incidents and impacts, or perceived impacts.

The Grievance Mechanism (in Appendix A) provides a structured way of receiving and resolving grievances. The mechanism will be used for the duration of NSEZ life. Grievances will be monitored to provide signals of any escalating concerns or disputes.



## **11. REPORTING, MONITORING AND EVALUATION**

Transparent documentation of engagement activities will enable NSEZ to track stakeholders' perceptions and concerns regarding its activities, facilitate the identification of additional stakeholders and stakeholder groups, and track the effectiveness of engagement activities.

Attendance will be taken for all public or individual meetings and minutes will be written up following the meeting. Meeting minutes will be taken to record all stakeholder comments or concerns received during meetings and key points from consultations will be recorded in the Stakeholder Consultation & Grievance Management System (user instructions are provided in Appendix B).

As part of the SCGMS, there is a reporting function which allows the user to get the most out of data stored in the system. The purpose of the reporting is to allow LP and other interested parties (with appropriate permission) to monitor and evaluate the level and efficiency of stakeholder engagement activities undertaken for the Operation Phase and will assist with decision making when observing the level of recurrence of issues and concerns stakeholders have raised during a certain period of time.

The report generated through the SCGMS can be filtered to restrict the data returned, be it by Type of Activity, Stakeholder Group, Issue Type or Consultation Type. This allows the reporting to be targeted and compared across indicators defined for the site.

### **11.1 STAKEHOLDER CONSULTATION & GRIEVANCE MANAGEMENT SYSTEM**

The SCGMS is a central system developed for managing and documenting the stakeholder engagement activities for NSEZ. It is designed to record and manage stakeholder information and interactions in a format that allows for easy registration, searching and reporting.

To ensure data is efficiently stored and related, the Grievance Mechanism Platform will be developed, and also will benefit from a customised user interface with reports and data entry forms.

### **11.2 DATA MANAGEMENT**

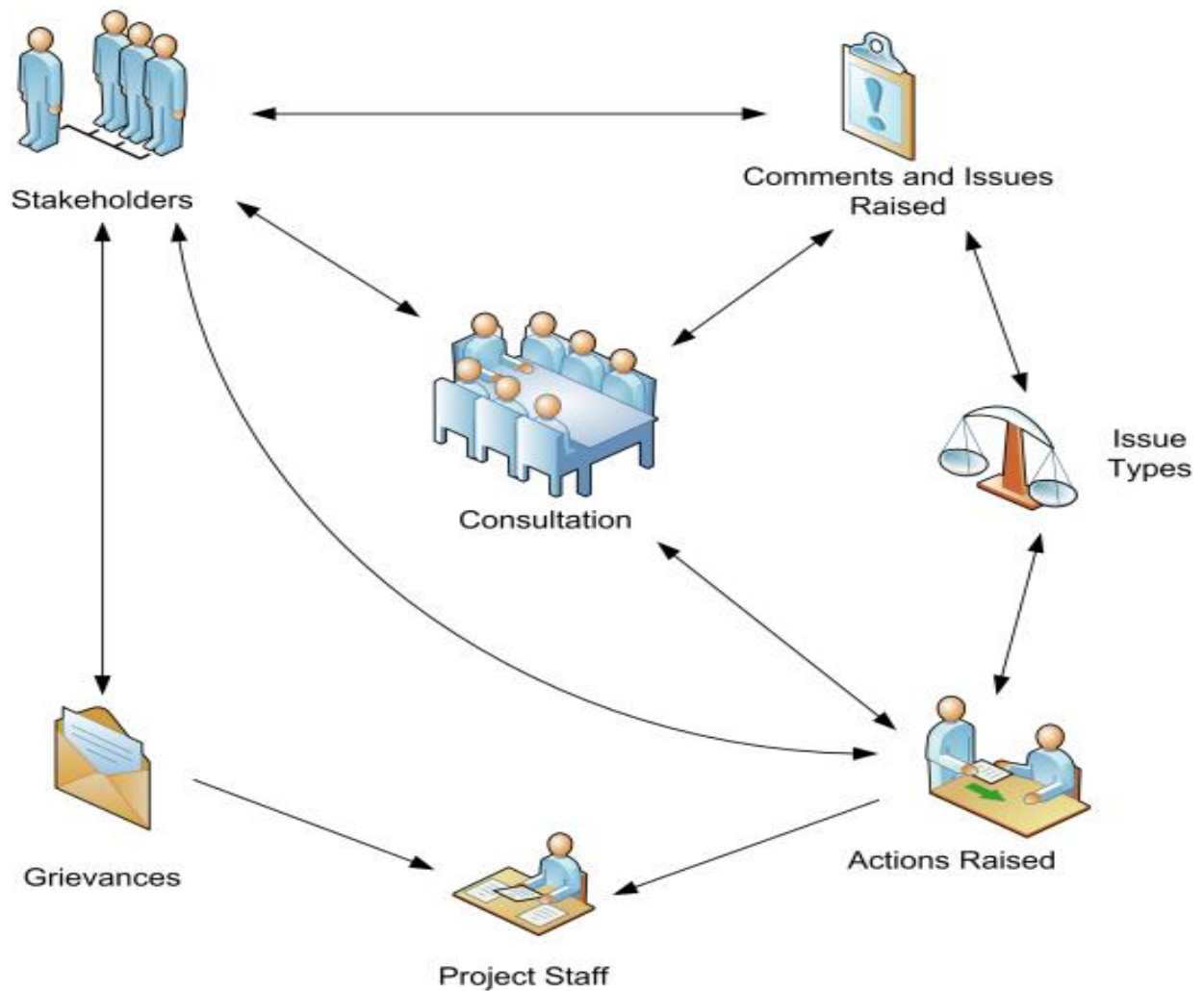
The SCGMS stores the following consultation data:

- Stakeholder Groups
- Individual Contacts (which are related to Stakeholder Groups)
- Consultations, including the following information:
  - Detailed Consultation Records
  - Ad-hoc substantive meetings or discussions
  - Attendees
  - Comments and issues raised
  - Actions raised
- Project Grievance Mechanism

The information stored in the SCGMS is managed in a relational table structure, which ensures there are links between the different data types, so for example an Issue raised at a Consultation is related to the Consultation itself, with the person that raised it, and with an associated Key Issue Type.

As all of this data is related, reports have been made inside the SCGMS to harness these relationships.

**Figure 4: Relationships within the SCGMS**





## **12. SEP REVIEW**

This document is a 'living' document that will need to be updated regularly as the NSEZ activities evolve. It can also be updated at any point as new activities or stakeholders are added. However, as a minimum, the document should be reviewed:

- When on-going stakeholder engagement provides new information or requires a change in operational activities.
- When operation activities change.
- Following changes in applicable national legislation and/or regulatory requirements of NSEZ activities.
- Following changes in applicable international standards (IFC PSs);
- Following changes in corporate policies or commitments;
- Based on NSEZ Environmental and Social Governance Framework.



### **13. CAPACITY BUILDING AND TRAINING**

All NSEZ personnel responsible for engaging with stakeholders throughout the operation will be required to undertake sensitisation training to understand the 'do's and don'ts' of stakeholder engagement.

Training will be conducted by the NSEZ E&S Manager, with assistance from HSE team.



## 14. REFERENCES

**International Finance Corporation**, 2007. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

**International Finance Corporation**, 2012. Performance Standards on Environmental and Social Sustainability.



## **APPENDIX A – GRIEVANCE MECHANISM**

**APPENDIX B – GRIEVANCE SUBMISSION  
FORM**



# **APPENDIX C – GRIEVANCE REPORT FORM**

**APPENDIX D – MATERIAL TO SUPPORT  
STAKEHOLDER MEETINGS**

# **APPENDIX E – STAKEHOLDER MAPPING**

Group	Stakeholder	Interest level	Influence level	Required Engagement	Means of communication
National Authorities	DGEPN	High	High	In-depth	Specific reports, ad hoc/annual meetings, specific correspondence, Committees/Workshop, Grievance Management System
	Ministry of Labour and Employment	Medium	High	In-depth	
	Single Window Clearance	High	High	In-depth	
Land Registry	ANUTTC	High	High	In-depth	Grievance Management System, Committees/Workshops, Ad hoc/annual meetings.
Air Quality Monitoring	TEREA	Medium	High	In-depth	Reports (monthly/quarterly/yearly???)
Media	Union Daily Newspaper	Medium	Medium	Focused Engagement	Leaflet, website, information boards
	Agence Gabonaise de Presse				
	Gabon TV				
Local Authorities	Prefect of Ntoum	High	High	In-depth	
	Mayor of 2 <sup>nd</sup> Administrative subdivision of Ntoum				
Neighbourhoods (and chiefs)	Nzogmitang-Centre (Mba Asse Innocent), Nzogmitang Rail (Mbina Pierre), Nzogmitang Carrière (Mikala Mombo André), Nzogmitang Messonga (Ada Ekore Flavienne), Bissobinam Eglise (Mba Obame François), Nkok Oveng-Assi (Mimbi Alphonse), Nkok Bengole (Mougoula Marie), Nkok Nki, Nkok Metane, Nkok Messonga, Nkok Cité, Nkok Sôghe N'uki (Mebale m'Ondo Daniel), Nkoltang Centre, Nkoltang Edoume-Assi (Assoumou Mba Emmanuel), Nkoltang Ndjiabéré, Nkoltang Rail, Nkoltang Cité administrative, Nkoltang Mbil-Avong, Nkoltang Mitsaba, Nkoltang Nzogmitang, Ayeme-centre (Nguema Patrick), Ayeme Zamata 1 (Bouassa Moussadji Jean),	Medium	Medium	Focused Engagement	Annual meetings, Grievance Management System, Website, Leaflets, Information boards

	Ayeme Zamata 2, Ayeme Ntô (Mouloungui Moïse), Ayeme Elane and Ayeme-Maritime.				
PAC	Essassa-Bissobinam, Nkok	High	Low		
NGOs					Annual meetings, Website, Leaflets, Information boards

