THE FEDERAL DEMOCRATIC REPUBLIC OF ETHIOPIA MINISTRY OF INNOVATION AND TECHNOLOGY



Eastern Africa Regional Digital Integration Project (EARDIP) SOP II (P180931)

Stakeholder Engagement Plan for Ethiopia

September, 2023 Addis Ababa, Ethiopia

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ACRONYMS AND ABBREVIATION

CAPP	Cluster Area Project Personnel
CRC	Community Resettlement Committee
DVGs	Disadvantaged and/or Vulnerable Groups
EA-RDIP	Eastern Africa Regional Digital Integration Project
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FDRE	Federal Democratic Republic of Ethiopia
GBV	Gender-Based Violence
GoE	Government of Ethiopia
GRM	Grievance Redress Mechanism
НоА	Horn of Africa
HUCs	Historically Underserved Communities
IDPs	Internally Displaced Peoples
KGMC	Kebele Grievance Management Committee
KII	Key Informant Interview
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MInT	Ministry of Innovation and Technology
NPSC	National Project Steering Committee
NPTC	National Project Technical Committee
PCs	Project Contractors
PAD	Project Appraisal Document
PAFP	Project Area Focal Person
PAPs	Project Affected Persons
PDO	Project Development Objective
PIU	Project Implementing Unit
PSGMC	Project Site Grievance Management Committee
PVC	Property Valuation Committee
RF	Resettlement Framework
RGMC	Regional Grievance Management Committee
RP	Resettlement Plan
RPSC	Regional Project Steering Committee
RPTC	Regional Project Technical Committee
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
W/CGMC	Woreda/City Grievance Management Committee
WGMC	Woreda Grievance Management Committee
WPTF	Woreda Project Task Force

1. INTRODUCITON

1.1 General Background

- 1. Eastern Africa Region is characterized by poor digital infrastructure. Lack of affordable and accessible broadband connectivity seriously hamper the regional connectivity market in the Eastern Africa. The region is home to countries with varying levels of connectivity infrastructure development, which explain spruce, performance, and broadband penetration differentials¹. This constitutes a fundamental barrier for beginning to develop a more digital regional market suggesting for solution. National and regional connectivity markets could be better served through the development of open access and interconnected national backbone networks as well as the deployment of new cross-border links that would be key to eliminating pricing and quality differentials between coastal and landlocked countries. Supporting universal digital connectivity access in the region will also require a push to expand service provision ('last mile' access networks) to underserved or unserved rural and borderland areas.
- 2. The regional data market is characterized by absence of effective, trusted, and secure data transmission, storage, and governance. A data-EA-RDIP economy and development of an integrated data market in Eastern Africa will require that data can flow freely and securely across borders. Allowing data to be processed, analyzed, stored, or used anywhere in the region is an essential enabler for the scale-up of online services, including regional e-commerce and cross-border exchange of digital payments, but also relies on a well-developed and harmonized connectivity and data market. However, the region's data frameworks and data infrastructure are underdeveloped to this end.
- 3. Backdrop to this, the Eastern Africa Regional Development Integration Project is a Series of Project (SOP) and will be implemented in two phases. At the country level, SOP-II would support the implementation of the World Bank Group Country Partnership Frameworks (CPFs) for Ethiopia and Djibouti. SOP-II will run parallel to, investments in SOP-I. The Ethiopia CPF (FY18-22, extended to FY23, Report No. 119576-ET), was discussed by the Board before the current, reforming government, took power in April 2018, and is dated² but nevertheless it recognizes the ICT sector as a key factor in advancing productivity and structural transformation. The Djibouti CPF (FY22-26; Report No. 147787-DJ) notes that the telecom sector remains uncompetitive and would benefit from entry of the private sector to boost innovation and efficiency. Since the two CPFs were published, both countries have gained new IDA lending programs: Digital Ethiopia (P171034, US\$200m) runs from 2021-2026 while Digital Djibouti (P174461, US\$10m) runs from 2022-27. Therefore, the Series of Project phase two (SOP-II) is aimed to promote the establishment of an integrated digital market within and across the Eastern Africa countries including Ethiopia by increasing the cross-border flow of broadband, data traffic and digital services.

1.2 Project Description

4. Despite its shared culture and common history, the Eastern African region that spanning from Sudan to Tanzania remains poorly integrated and there is scope to expand both intra- and inter-regional trade, on the back of further market integration.

¹ Eastrn Africa Regional Digital Integration Project (EA-RDIP) Project Appraisal Document.

² Several transformation changes have taken place in the digital sector between 2018-21 (after the CPF was completed) notably the passage of a new law, the establishment of a new regulatory authority and the introduction of a new full-service competitor to the incumbent.

1.2.1 Project Development Objective (PDO) PDO Statement:

5. The project development objectives are to advance digital market integration in the Eastern Africa region by increasing affordable access to regional broadband connectivity and strengthening the enabling environment for cross-border digital services.

PDO Level Indicators:

- 6. The achievement of the PDO will be measured by the following results indicators:
 - a) Increasing affordable access to regional broadband connectivity
 - Volume of international data traffic (Used international bandwidth in Gbit/s/per capita) (number)
 - Broadband penetration rate (active broadband subscriptions per 100 inhabitants) (mobile and fixed) (number)
 - Monthly price for 1 GB of Mobile broadband data (US\$).
 - b) Strengthening the enabling environment for cross-border digital services
 - Number of beneficiaries with new or improved income opportunities because of digital skills training, of which, female.

1.2.2 Project components

7. As with SOP-I, SOP-II project is designed around three integrated and mutually reinforcing components, which reflect the distinct but interconnected layers of an integrated regional digital market. Components 1, 2 and 3 will support respectively Connectivity Market Development and Integration; Data Market Development and Integration; and Online Market Development and Integration. Further, Component 4 will support Project Management and Implementation Support (at regional and national level), while Component 5 will provide a Contingent Emergency Response Component (CERC). These components include a menu of activities from which the Borrowers (Djibouti and Ethiopia), will select activities to be implemented under SOP-II, based on their most pressing needs and their regional interaction.

Component 1: Connectivity Market Development and Integration

- 8. This component will bridge existing network coverage and access gaps through infrastructure financing and support for an enhanced enabling environment to develop the regional broadband connectivity market. With the objective of expanding access, the financed activities will ensure that recipient countries also enhance network redundancy and cable route diversity, allowing the region to meet increasing demand for internet bandwidth. Cross-border, national backbone and backhaul, and access network infrastructure will be partially financed where there is a market failure, using various financing mechanisms depending on market need. Detailed country-level feasibility studies to be funded under this component will further define the precise arrangements under which the cooperation between the Government and the operators on infrastructure deployment will be further developed. To this end, component 1 has the following three sub-components.
- 9. **Sub-component 1.1: Cross-border and national backbone network connectivity:** This subcomponent will support the deployment of key missing cross-border and backbone fiber links to improve the resilience, coverage, and integration of regional connectivity networks. Support will be provided to deploy upwards of up to 3,000 kms of fiber network in Ethiopia, covering strategic cross-border and national backbone network links as well as their extension into borderland areas, with a view to creating an integrated regional backbone network allowing for reduced cost and improved quality of transmission of capacity

throughout the region. Financing support will be provided to operators who will be expected to cofinance, design, build, and operate the network infrastructure. Infrastructure deployment will be based on key principles of providing services on an open access basis, while offering reasonable wholesale rates to support affordable service expansion to be detailed in a Commercial Transaction Manual (CTM). Project financing will cover:

- a) TA for the (i) detailed network design including technical specifications for prioritized routes and network architecture/configuration, leveraging parallel deployment of linear infrastructure wherever possible and site selection of cell towers is informed by climate and disaster risk assessments (ii) develop a universal access market gap assessment including identifying sites to be connected along priority routes; and (iii) survey and providing quality assurance of deployed routes.
- b) TA to (i) define financing options for deployment, ownership, management, and maintenance of the network between the Government and the operators to be detailed in a CTM and (ii) provide transaction advisory services to prepare related bidding documents and support for launching and administering the commercial transaction.
- c) Financing associated with broadband network infrastructure deployment, including the construction and upgrade of cross-border terrestrial links and national backbone network infrastructure, subject to the adoption of a CTM. In Ethiopia: Up to 1,100kms of fiber links building greater resilience with up to five additional routes to the sea.
- d) Financing digital infrastructure rehabilitation in the conflict affected area³ in Tigray, Ethiopia including rehabilitating cell towers, fiber optic links, transmission networks and related infrastructure.
- 10. *Sub-component 1.2: Last mile connectivity including in borderland areas:* This subcomponent will connect rural, borderland areas, where the commercial incentive for last-mile network expansion is insufficient to propel further infrastructure investment. By providing catalytic funding to stimulate demand by key user groups and in low-income market segments (including in refugee/IDP camps, conflict affected areas in Tigray in Ethiopia and locations in rural and borderland areas), this subcomponent will follow Mobilizing Finance for Development (MFD) approach to unlock further private sector infrastructure investment in unserved or underserved areas. The financed infrastructure will be deployed using a range of modalities, including reverse auctions, bulk purchase of capacity, and/or licensing arrangements that aim to maximize private sector financing. These mechanisms are expected to incentivize private sector investment in the rollout and maintenance of last-mile access networks that connect targeted locations/areas. They will also benefit the wider consumer base in the vicinity of connected sites, with national governments serving as the anchor tenant required for enhanced service provision. Project financing will cover the following:
 - a) Financing of connecting public institutions along fiber routes through pre-purchase of internet bandwidth capacity for public institutions, fiber deployment, and information technology (IT) equipment for government offices, schools, hospitals, and other public institutions.

³A damage assessment study carried out by the World Bank in 2022-23 estimated that damage to communications infrastructure amounted to around US\$487m. Adapted from World Bank. Forthcoming, 2023. *Ethiopia Conflict Impact Assessment and Rehabilitation Project: Volume A – Damage and Needs Assessment*

- b) Financing for backhaul and last-mile networks in borderland areas, and covering refugee, and IDP camps. In Ethiopia this will include establishing/upgrading broadband radio access networks (RANs, minimum 4G technology) in woredas, covering refugee/IDP camps on the Somalia-South Sudan border, their host communities and schools, health care facilities, humanitarian and relief agencies for host communities and IDP/refugee camps, and education facilities in Tigrayan region.
- 11. Sub-component 1.3: Enabling legal, regulatory, and institutional ICT environment: This sub-component will provide upstream enabling policy, legal and regulatory support, as well as capacity building to stimulate broadband market development and harmonization at the national and regional level. Building on the regional harmonization efforts under SOP-I, activities under this sub-component will support the strengthening, modernization, and regional harmonization of the legal, regulatory, and institutional frameworks governing the telecom sector to foster competition and private sector investments and unlock the potential of the ICT sector nationally and across borders. Support will also be provided to increase capacity at the national level to implement these initiatives, working with national ICT regulatory authorities, agencies, and line ministries for ICT at the national level and through the RECs at the regional level. Project financing will cover the following:
 - a) TA, capacity building and financing of systems (information technology hardware and software) for and national telecom regulators and universal service access funds to support effective harmonization, implementation, and sustainability of connectivity investments under the project through technical trainings and additional advisory services. This activity would build on the feasibility study and recommendations for the operationalization of an ICT regulatory association in the Horn of Africa under SOP-I.
 - b) TA and capacity building to reduce and/or eliminate roaming charges on voice and data services in the region, building on the One Network Area (ONA) initiative of the EAC and the feasibility assessment and roadmap developed for the IGAD Member States under SOP-I.
 - c) TA to the telecom regulator in Ethiopia (ECA) on developing climate smart infrastructure, including e-waste management protocols, and rollout guidelines.
 - d) Capacity building to Ethiopia's MInT's to operationalize gender-specific recommendations outlined in Ethiopia's (forthcoming) 'National Digital Inclusion Strategy.'

Component 2: Data market development and integration

- 12. This component seeks to foster the development of a regional data market by enabling more affordable, secure, and seamless data management and sharing across borders. It will finance data infrastructure to reduce the latency and costs of data sharing within the region, as well as build on the regional harmonization efforts under SOP-I and enhance and harmonize data governance through improved national and regional frameworks, including in areas such as data protection, to support secure data processing and prevent misuse. Financing will also be provided to strengthen cybersecurity incident response, including through regional partnerships and frameworks. Support will be provided to enhance data management and hosting infrastructure, with a view to achieving economies of scale and strengthening climate resilient data management. Capacity building workshops and training will be supported for representatives of the public and private sector. All training and workshops conducted will be in formats compliant with accessibility standards (appropriate headers, landmarks, labeling, alternative text, etc.).
- 13. **Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity:** This subcomponent seeks to strengthen cybersecurity and incident response capabilities in the region. It will do so both by strengthening basic national frameworks and through coordination at the regional level, with a strong

focus on skills development and pooled resources. The financed activities will support the development of best practice frameworks, enhanced technical and operational capabilities, as well as capacity building, grounded in an understanding of the regional and national cyber threat landscape and regional knowledge sharing, to help create a trusted online transaction environment and safeguard digital infrastructure and services. Project financing will cover the following:

- a) TA to introduce and strengthen national legal, strategic, and institutional frameworks for cybersecurity, including compliance standards, as well as their harmonization at the regional level. (Ethiopia, Djibouti)
- b) Support for the establishment of a Cybersecurity Emergency Response Team (CERT) in Ethiopia and Djibouti including related TA, hardware and software.
- c) Financing basic and advanced cybersecurity training, knowledge-sharing workshops, and public awareness campaigns, at the national and regional levels, targeting policy makers, public sector employees, members of regional bodies, the business community, and high-risk sectors (financial, telecom, and infrastructure) and the development of cyber training programs, with targets for the number of female beneficiaries.
- **14.** Sub-component 2.2: Data exchange, governance, and protection: This subcomponent will support investments in enabling data infrastructure and governance frameworks that facilitate cost-effective and secure data exchange in the region. It will build on the regional harmonization efforts under SOP_I and focus on adopting common frameworks for data protection and data governance, reducing barriers for data sharing within and across borders, and enabling and promoting interoperability. It will also introduce data infrastructure that helps facilitate reducing the costs and climate impact of data storage, processing, and sharing in the region. Similar to the approach taken under 1.1 and 1.2, financing of data infrastructure will go through a competitive tender to encourage private sector participation, unless there is restricted private sector interest or if there is justification of government ownership of that infrastructure. Project financing will cover the following:
 - a) TA to undertake data hosting (including adoption of a cloud-based approach) and data management needs assessments at the national level, looking at demand and supply, regional demand aggregation, and options for attracting private sector investment and scope for strategic partnerships, as well as reducing associated environmental and climate impacts.
 - b) Financing for deploying resilient and agile hybrid (cloud and on-premises) data hosting solutions (infrastructure and services) at the national level.

Component 3: Online Market Development and Integration

15. This component aims to build the regional online market by removing barriers to cross-border trade and payments, as well as investing in key enablers for expanded digital service delivery. Leveraging the regional harmonization efforts under SOP-I, it will support the development of regional and national legal and governance frameworks on e-commerce, trade, and payment systems to improve and expand national governments' capacity to support growth of cross-border services, payments, and trade. Financing support will be provided to deploy digital public infrastructure and TA to ensure its adoption across ministries, departments, and agencies (MDAs) through targeted digital skills training. By enhancing the digital capabilities of public administrations, the project will expand government capacity to provide e-services and implement regional-level agreements and systems. This component will also develop the regional digital skills base more broadly, through support for National Research and Education Networks (NRENs) and new digital skills training programs in areas where digital skills gaps are identified.

- 16. *Subcomponent 3.1: Digital enablers for cross-border trade, payments, and service delivery:* This subcomponent aims to enhance readiness to expand digitally enabled cross-border trade and service delivery, by introducing key enablers. With a view to supporting the E-Commerce Protocol under African Continental Free Trade Area (AfCFTA) and leveraging the development of an E-commerce Strategy for IGAD under SOP-I, this subcomponent supports a regional approach to digital trade through the development of key protocols for e-commerce, and capacity building for national trade ministries. This subcomponent will also enable and facilitate cross-border transactions for goods and services by developing the mutual recognition of e-signatures and supporting regional standardization and consensus-building efforts to deepen the integration of regional payment systems, building on national efforts already supported by the World Bank. Support will also be provided at the national level to develop shared digital public infrastructure for scaled digital service delivery and e-commerce. Project financing will cover the following:
 - a) Capacity building for national line ministries for trade, commerce, and investments, to improve their readiness to participate in regional trade agreements, including through the development of e-commerce strategies, and development of national protocols pertaining to the ICT sector obligations for World Trade Organization and AfCFTA accession.
 - b) TA and capacity building towards the adoption of regionally harmonized frameworks for the mutual recognition of e-signatures and e-transactions, in line with best practice standards. The capacity building will leverage similar activities undertaken by IGAD and financed under SOP-I.
- 17. Subcomponent 3.2: Research and education networks and training for digital skills: This subcomponent will provide assistance to the regional activities of the Ethiopian National Education and Research Network (EthERNet). It will enable the expansion and strengthening of the regional infrastructure supporting higher education by establishing regional collaboration among NRENs, allowing for economies of scale and knowledge transfer. Support will be provided to enhance the capacity of universities and TVETs, in partnership with NRENs and governments, to deliver digital skills programs for civil servants and university faculty and students. All skills programs will be encouraged to adapt pedagogical tools and techniques with a view to being accessible for people with disabilities. Project financing will cover the following:
 - a) Financing capacity building for existing NRENs and their membership in key regional networks (for example, the Ubuntunet Alliance and the EU Africa Connect 3 program), including support for staffing, equipment, and business planning to expand services offered by NRENs to the education sector.
 - b) TA for the development of a long-term business plan for sustainable EthERNet expansion.
 - c) Collaboration between NRENs in the region, through regional capacity-building initiatives (study tours and workshops) and regional access to open educational resources.

Component 4: Project Management and Implementation Support

18. This component will finance project management and implementation of project-associated activities. It will cover the additional operating costs of the project implementation units (PIUs). This component will help strengthen the technical and functional capacity of the PIUs, including through the recruitment of expert consultants in key areas and the facilitation of on-the-job learning and competency transfer. It will support independent audits, monitoring and evaluation (M&E) and quality assurance to ensure compliance with best procurement and financial management (FM) practices. Support will be provided to enable collaboration between regional and national PIUs. This component will also support Environmental and Social Framework (ESF) compliance, with a particular emphasis on addressing the high security- and GBV-related risks associated with the deployment of infrastructure and civil works, including stakeholder

consultation, a robust grievance redress mechanism, and development of site-specific assessments and plans. In Ethiopia, the PIU will be at the Ministry of Innovation and Technology (MInT), serving the Digital Ethiopia project since 2021.

Component 5: Contingent Emergency Response

19. This component will allow for rapid reallocation of uncommitted national IDA funds in the event of an eligible emergency declared in one of the participating countries. For the Contingency Emergency Response Component (CERC) to be activated and financing to be provided, the recipient will need to (a) submit a request letter for CERC activation, and the evidence required to determine eligibility of the emergency; (b) submit an Emergency Action Plan, including the emergency expenditures to be financed; and (c) meet the environmental and social requirements as agreed in the Emergency Action Plan and Environmental and Social Commitment Plan. By having Emergency Action Plan and allocating related budget, CERC will help strengthen the institutional capacity to respond to emergencies caused by climate and natural disasters, and support reinforcing the country's resilience to climate and natural risks identified above.

1.2.3 Project target areas

20. SOP-II of the EA-RDIP is proposed to be implemented in five priority fiber optic linking routes covering four regional states, namely: Benishangul-Gumuz, Afar, Somali and Tigrary. *Table 2* shows the list of the proposed connectivity routes along with the fiber route in km.

Connectivity Route	Fiber Route in km			
Ethiopia-Sudan: Bameza to Ad-Damazin	134 kms			
Ethiopia-Djibouti: Halli to Dalho	74 kms			
Ethiopia-Eritrea: (i) Adwa to Asmera (ii) Mitsiwa Halli to Aseb	334 kms			
Ethiopia-Somalia: (i) Imi to Dollo (ii) Golo to Beledweyne	510 kms			

Table 1 Priority Fiber Optic Linking Routes for Ethiopia

1.2.4 Project beneficiaries

- 21. The project will benefit citizens targeting specifically women, persons with disabilities, refugees, IDPs, businesses, public sector MDAs, and **RECs** through improved access to connectivity and an environment enabling digital services and digital skills:
 - a) Citizens. Citizens will benefit both indirectly and directly from wider opportunities to participate in an expanding regional digital market, which offers new employment opportunities and access to new public and commercial services online. Expansion of network coverage will directly benefit unserved or underserved communities, particularly in rural and borderland areas, where new networks are deployed or upgraded, supporting greater digital access and inclusion. Network coverage (of the population) is expected to significantly increase. Further, approximately 5,000 citizens, of which at least 30 percent are women, including persons with disabilities, will also benefit directly from digital skills trainings (conducted using accessible techniques and tools), which will increase their readiness to access online service and contribute to the development of the digital market.
 - b) **Refugees and IDPs.** Refugees, IDPs, and people in host communities will directly benefit from enhanced network coverage and new access to mobile and emergency response ICT infrastructure, for example, boosting their resilience to withstand climate shocks.

Region, location	Number of Refugee Camps
Gambela- North-West, border with South Sudan	14
Jiljiga Refugee camps - North-East, border with Somalia and Melkidia Refugee Camps - South border with Somalia	9
Total	23

Table 2 Proposed coverage of refugee/IDP Camps and host communities in Ethiopia

- c) ICT service providers, including mobile network operators and internet service providers, will directly benefit from the project through contracts for infrastructure deployment and capacity purchase as well as local procurement of IT, awarded on a competitive basis. The wider business community will also benefit indirectly from reforms supported and investments made, including a more secure and cost-effective environment for conducting business online, on the back of more reliable, better quality, and low-cost broadband services; more seamless data exchange within and across borders; and the deployed enabling digital public infrastructure that facilitates online services, which boosts e-commerce. The creation of a regional digital market will provide local businesses with opportunities to scale within the region and access larger markets more easily.
- d) Public sector. The main direct beneficiaries of the project include the Ministry of Innovation and Technology (MInT) and the Ethiopian Communications Authority (ECA) that will receive targeted financial and technical assistance. However, public institutions (including unconnected government offices, healthcare centers, schools, universities, TVETs) will also benefit from improved access to connectivity and access to shared digital infrastructure (e.g. IXPs, data hosting solutions). In addition, civil servants including female staff will be trained in management or use of digital systems and digital skills.

1.3 Objectives of the SEP for EA-RDIP

- 22. The SEP for the EA-RDIP recognizes the importance of open and transparent engagement between the project implementing agency MInT and project stakeholders as an essential element of good international practice. The project perceives that effective stakeholder engagement can improve the environmental and social sustainability of the project, enhance project acceptance, and make a significant contribution to successful project design and implementation. With this overall rationale in mind, the specific objectives of the project SEP are to:
 - (i) establish a systematic approach to stakeholder engagement that will help the project implementing agency MInT identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties.
 - (ii) assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
 - (iii) promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
 - (iv) ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.

(v) provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow the MInT to respond to and manage such grievances.

1.5 Scope of the SEP for the Project

- 23. The MInT will engage with stakeholders throughout the project life cycle. For the scope of this SEP, the project life cycle starts with the identification of the proposed project; proceeds through the development of the project, the environmental and social assessment; project implementation and monitoring; and ends with the closure and decommissioning of the project. To this end, project-related stakeholder engagement starts at project identification and continues until closure of the project in a time frame that enables meaningful consultations with stakeholders as an iterative process.
- 24. The nature, extent and frequency of the stakeholder engagement is determined by the significance of the environmental and social risks and impacts of the project and the level of concern expressed by stakeholders. Given that the ESMF of the project rated its environmental and social risks as substantial stakeholder engagement improves the quality of project implementation, and builds trust with the project affected communities and other stakeholders, the SEP for EA-RDIP includes several formal points of engagement as well as ongoing information dissemination throughout the project cycle. Details on these formal points of engagement will be described in the later section.

2 LEGAL FRAMEWORK

2.1 National Legal Framework

- 25. As the findings of the project ESFM show, the implementation of the EA-RDIP will have significant environmental and social risks and impacts to the project affected persons or communities that require their active engagement from planning stage to the performance of the project throughout its lifecycle. In recognition of this, the Federal Democratic Republic of Ethiopia (FDRE) has issued legislations concerning the rights of the project affected person/community in general and pastoralists and agropastoralists in particular to engage in the decision making process relating to development matters affecting their life.
- 26. The Constitution of the Federal Democratic Republic of Ethiopia starts by declaring the governing principles relating with development interventions such as EA-RDIP significantly affecting the life of the people: the rights of the citizens to improve living standard and sustainable development (Article 43 (1)), to be consulted with respect to the decision making process and development benefits from such interventions (Article 43 (2)).
- 27. In association with the implementation of EA-RDIP, one of the examples of critical issue that necessitate meaningful consultation of the project affected persons/communities is involuntary resettlement. As stated in the finding of the ESMF, the undertaking of all the three sub-components under Component 2 of the project (see the description of Section 1.2 above) require land acquisition that may cause economic and physical displacement. In view of this fact, Article (8) of the Ethiopian Constitution set out the rights of the peasants and pastoralists for a meaningful consultation and the protection against forced eviction from their possession. Further, the Ethiopian Constitution has the provision on resettlement and rehabilitation as the civic rights of the citizens. Article (44), Sub-Article (2) has a clause stating that: "All persons who have been displaced or whose livelihoods have been adversely affected as the result of development programs, whether by the government or private sector, have the right to commensurate monetary or alternative means of compensation, including relocation with adequate state assistance."
- 28. The Government of Ethiopia has provided further specific enactments to regulate on the engagement of the affected persons/communities and resettlement compensation procedures. Expropriation of Land for Public Purpose, Payments of Compensation and Resettlement of Displaced People, Proclamation No. 1161/2019 has set out the requirement for participatory approach to initiate the land expropriation and compensation process (Article 18). Otherwise, Article 19, Sub-Article (1-2) sated: "Any person who received an order of expropriation of his landholding; or who has an interest or claim on the property to be expropriated may file an application within 30 days of service of the order to the Complaint Hearing Body. While Article (19), Sub-Article (2) described on how such Complaint Hearing Body is established. As asserted in Article (20), Sub-Articles (1): "A party who is aggrieved with decision given on his own land expropriation or compensation procedures shall file an appeal to the Appeal Hearing Council within 30(thirty) days of the receipt of the written notice of the decision thereof. If the party feels that his grievance is unresolved by the Appeal Hearing Council, he has the right to appeal to the Regional High Court within 30 days of the receipt of the decision in writing (Article (20), Sub-Article (2)).
- 29. As per the Proclamation No.1161/2019, the government can expropriate land for any used deemed better for development whether public or private. To avoid a low bar for expropriation, however, the Proclamation has set out further procedures. Article 5, Sub-Articles (1), (2), (3), (4), and (5) detailed on the procedure to expropriate land and responsible organ to give decision on expropriation of land for projects

intends for public purpose. Article (5) Sub-Article (1) of Article 5 states that the appropriate Federal Authority, or a Regional, Addis Ababa, Dire Dawa, cabinet shall decide on expropriation of land on the basis of an approved land use plan; or master plan; and whether the expropriated land directly or indirectly brings better development for the public.

- 30. The lives of the project-affected pastoral communities are inextricably linked to the land on which they live and the natural resources on which they depend. They are therefore particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources resulting from project-related land acquisition or restriction on land use calling for due attention of national legal legislation. Proclamation No. 1161/2019 has the provision that recognize such differential impacts of the project and the need for special consideration for the affected pastoral and agro-pastoral communities. Accordingly, Article 12 of the Proclamation obligate the preparation of Resettlement Plan with special measures for effective participation, compensation, assistance and livelihood restoration for the project affected pastoral and agro-pastoral.
- 31. Besides providing details of the compensation payment for the replacement of property loss (Article 12, Sub-articles 1-5), Proclamation No. 1161/2019 has the provision on resettlement package in case of economic and physical displacement associating with the implementation of the EA-RDIP. Under Article 16 (sub-article 2), the Proclamation mandates the responsible bodies to establish a resettlement package for the affected persons as follows: "Regional states, Addis Ababa, and Dire Dawa City Administrations, shall develop resettlement packages that may enable displaced people to sustainably resettle". The Proclamation gives the affected community the right to purchase shares from the investment. Furthermore, as indicated in Sub-Article (4) of the referred Article, the regional States and City administrations shall establish a fund for compensation payment and rehabilitation.

2.2 World Bank Requirements

- 32. The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure", recognizes 'the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice'. Specifically, the requirements set out by ESS10 are the following:
 - Borrowers will engage with stakeholders throughout the project cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders.
 - Borrowers will 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. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding grievances; and (vi) reporting to stakeholders.
 - The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders

consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.

- A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower must disclose the updated SEP. According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.
- 33. As per Guiding Notes 25.3, the borrower is expected to conduct stakeholders' consultation in line with the Good Faith Negotiations. Thus, SEP is required to implement meaningful consultation with stakeholders in line with the Good Faith Negotiation that involves: (a) willingness to engage in a process and availability to meet at reasonable times and frequency; (b) sharing of information necessary for informed negotiation; (c) use of mutually acceptable procedures for negotiation; (d) willingness to change initial positions and modify offers where possible; and (e) provision of sufficient time for the process.
- 34. In addition, the World Bank's ESF provides specific provisions that target differentially vulnerable groups of people such as pastoralists, as required in ESS7 (paragraph 23) and ESS10 (paragraphs 19-22). For every project cycle the borrower is expected to make meaningful consultation and informed decision of pastoralist in a culturally appropriate and gender and intergenerationally inclusive manners. Likewise, as per the reference, the borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolve.

2.3 Gap Analysis

35. An overview of the national policies, legal and institutional framework reveals several gaps regarding the mechanism to implement effective stakeholder engagement at project level. *Table 3* below summarizes the gap analysis comparing between the national legislation and World Bank.

National legislation	World Bank	Project
The national legislation has no provision for the development of a specific stakeholder engagement plan for public consultations.	Consultations with stakeholders and public involvement are the integral parts in the development and implementation of the SEP.	Ethiopia currently does not have clear national legislative provisions on the citizen and stakeholder engagement for specific investment programs and projects. In those cases, it relies on the relevant provisions of the WB requirements. The project will carry out a comprehensive consultative process with project stakeholders as being required through public disclosure meetings, individual consultations and public consultations.

Table 3 Gap Analysis between the National Legislation and World Bank

National legislation	World Bank	Project
The national legislation has provisions that allow citizens to make complaints and grievances, but these provisions do not allow anonymity. Anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.	The World Bank ESS10 allows the option of anonymous provision of grievances.	The project will apply the WB standard and allow anonymous submission of grievances and complaints.
The national legislation does not have special provisions to address the concerns of the vulnerable groups during the consultation process.	The ESS10 specifically provides for the identification and engagement with vulnerable groups that might be affected by the project to ensure that these groups also benefit from the project activities.	To overcome the gap, the SEP put in place special mechanism to inform, engage with, and understand disadvantaged or vulnerable groups with regard to the impacts of the project on them, the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances. For example, accessible for stakeholders with sensory disabilities through providing project documents in Braille or engaging a sign language interpreter during the consultation. For pastoral communities where literacy level is generally low, SEP uses additional formats like location sketches, physical models, and film presentations to communicate relevant project information. The EA-RDIP SEP helps the public to understand technical documents, for instance, through the publication of simplified summaries, nontechnical background explanations, or access to local experts.
The national legislation does not have provisions to establish a Project specific GRM.	According to the ESS 10 and ESS 2 the Project specific GRM should be established and be easily accessible for all stakeholders at each stage of Project, including specific GRM for project workers.	The Project specific GRM will be established for all stakeholders at each stage of the Project, including GRM for all project workers. ⁴

⁴Directly engaged people (MoA/MoTRI staff and Beneficiary Agencies) and contracted workers (people employed or engaged through contractors/ subcontractors that will perform work for specific project activities).

3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT UNDER THE PROJECT

36. Engaging with stakeholder began during the assessment for the preparation of the Environment and Social (E & S) instruments for the EA-RDIP including the Environmental and Social Management Framework (ESMF), the Social Assessment, the Resettlement Framework (RF), the Security and Risk Assessment Plan (SRAMP), the Stakeholder Engagement Plan (SEP), and the Gender-Based Violence (GBV) Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Risk Assessment, Prevention and Response Action Plan. In the course of the preparation of these instruments, relevant stakeholders from federal to woreda level have been consulted. The preparation of the aforesaid E&S instruments for the project was parallel with this SEP and, thus, consultation with project-affected communities and other interested parties from federal to woreda level has been done from October 10 to November 18, 2022. *Table 4* presents the list of the participant organizations and number of Key Informants (KIs) from each stakeholders in the preparation of the project (E & S) instruments.

Table 4 List of Participant Organizations and Key Informants Consultation in the preparation of the
project E&S Instruments

Name of organization	Number of KII	Level of Stakeholder	
Ministry of Innovation and Technology	3	Group	
Ethiopian Communication Agency	1		
Ministry of Trade and Regional Integration	1		
National Research and Education Networks	1	-	
	4	Federal	
Development Bank of Ethiopia	4	reaciai	
Ethiopian Investment Commission	-	-	
Ethiopian Environmental Protection Authority	2	-	
Ministry of Women and Social Affairs	1	-	
National ID Program Office	2		
Afar Region Trade and Industry Bureau	2		
Afar Region Science, Innovation and Technology Commission	5		
Afar Region Women and Children Affairs Bureau	1		
Afar Region Peach and Security Bureau	1		
Afar Region Rural Land Use and Administration Bureau	1	Destand	
Afar Region Environmental Protection Bureau	1	Regional	
Somali Region Innovation and Technology Bureau	5		
Somali Region Women and Children Affairs Bureau	2		
Somali Region Environnemental Protection Bureau	3		
Gambella Region Innovation and Technology Commission	2		
Gambella Region Peace and Security Bureau	1		
Gambella Region Women and Children Affairs Bureau	1		
Elidar Woreda Trade Office	1		
Elidar Woreda Rural Land Use and Administration Office	1		
Elidar Woreda Environmental Protection Office	1	Woreda	
Elidar Woreda Women and Children Affairs Office	1		
Elidar Woreda Peace and Security Office	1		

3.1 Consultation with Federal and Regional Stakeholders

Federal Level

37. The consultation at federal institutions, has been always started with a discussion to gather information regarding their knowledge of the EARDIP, and provision of explanation from the team about the project if they are not aware. The consultation was also focused on providing information and receiving the concerns and opinions of the participants regarding the overall EA-RDIP objectives, its main components for which the ESMF is prepared. Consultations were also carried out to obtain their input in the identification of potential environmental and social impacts of the EA-RDIP and design of mitigation measures, their institutional arrangements for the implementation of the project.

Ministry of Innovation and Technology (MInT)

38. The discussions were made on October 24/2022, May 10/2023, July 06/2023 among the consultant and project focal point at MInT. MInT as the main implementing agency, helps the consulting team to identify the stakeholders at all levels and how to reach stakeholders at regional level, the discussion also includes the different components and the potential environmental and social risks/impacts of the project. In addition, MInT also expresses its concerns that the deployment of new fiber along the prioritized routes to be preferably from Kenya than Somalia as the area is vulnerable from security point of view.

Ethiopian Communication Authority (ECA)

39. The authority vice director has been consulted, as key informer on Oct 11/2022. ECA is already involved as implementing agency in the already existing EDFP project and ready to be part of EARDIP that can support its regulatory mission and vision. ECA expects EARDIP support for the institutional capacity building to establish laboratories and expertise who can use the laboratory procedure and identify the outcome of any imported digital equipment. The authority is implementing partner with the EDFP, so the E & S focal persons are already assigned and being participated in the ES mitigation measures implementation, the focal persons are provided with E &S training in collaboration with the EDFP and WB. So, the same focal person can serve for E & S concerns in the coming EARDIP subproject implementation.

National ID

40. The consultation meeting was also held on Oct 24/2022 with NID director and experts of the agency. They are not aware of the EARDIP, but they accept this project with open arms as it will be very supportive to meet their organizational target, which is to issue a unique identifier that will serve as the primary proof of identity to access services to all Ethiopian citizens and to all resident from any part of the world. The officials also emphasize that the countries in the eastern African region beneficiary of EARDIP should also have to use or develop interoperable applications for their respective NID which can synchronize with the application that NID using for unique identification purposes. This will help to implement the online regional market and integration concept of the project. The institution is a beneficiary for the EDFP so the same ES focal person will handle EARDIP implementation.

Ministry of Women and Social Affairs (MoWSA)

41. The consultation was conducted on Oct 26/2022 with the official in MoWSA expresses that Women in this country are not beneficiaries of online market facility developed regionally to participate 50 million women in Africa as they have digital capacity limitation both in know-how and digital facilities. Thus, the ministry believes that the EARDIP project can solve the gender disparity in the use of digital facilities and enable women at community level to participate in the regional and international trade opportunities. There is also a gap in gender equality in the projects implemented by different MDAs because women affair departments will not be invited to participate in project design and appraisal or implementation.

Ethiopian Investment Commission (EIC)

42. The informant from EIC is the Director for ICT department, and it was conducted on Oct 28/2022. EIC strongly believes that EARDIP will help the commission in meeting its mission and vision. The commission has experience in handling the World Bank projects.

Ministry of Trade and Regional Integration (MoTRI)

The consultation was conducted on Oct 28/2022 with the assigned official. The ministry will benefit from the implementation of EARDIP as the project has common targets with the mandates of MoTRI and hence the ministry will be benefited with the implementation of EARDIP. MoTRI, is mandated for enhancing cross border trade, bilateral trade and regional integration and it is also a regulatory body for e-commerce and cross border trade and digital economy exchange system. MoTRI has both human and institutional capacity gaps where EARDIP can intervene and support. MoTRI is involved in the previous World Bank supported project, aware of the E and S standards and policy of the World Bank.

Environmental Protection Authority

43. With the consultation made on Oct 31/2022, though, EPA is not implementing or beneficiary institution, the consulted governmental officials and E & S experts at authority are very happy as they have close working relation with the WB and glad to see such project who will respect and follow the national environmental and social regulations and guidelines in place by the authority. The standards and the guideline to be followed in the preparation of the ESRM instruments development will help the authority to identify gaps in the E & S policies, regulations, and guidelines that the authority issued so far and make proper corrective action.

EthERNet Under (MoE)

44. The consultation was made on Oct 31/2022, the focal person made a discussion with, under this implementing agency is aware of the project as EthERNet was part in the project appraisal process. The department is also a beneficiary of similar project (EDFP), it will also be benefited from this coming EARDIP project through component 3, NREN and hence they have big expectation in the expansion of digital facilities in educational sectors, developing regional integration among educational institutions, and in developing better connectivity. The institution is involved in the EDFP project so the ES focal persons will continue working with the EARDIP.

Development Bank of Ethiopia (DBE)

45. DBE consultation was held on Oct 31/2022 and DBE believes that EARDIP will contribute to enhance public private Partnership by improving access to finance for women. The project will enhance service delivery in the financial sector through technical assistance. As DBE involves in different development projects has immense experiences in ES safeguard activities and has enough expertise in this area.

Ministry of Labor and Skills (MoLS)

46. The consultation with the Ministry of Labor and Skills was conducted on February 23/2023. The official with whom the discussion was made, is very well aware of the World Bank project as this person is the focal person for the EDFP and believes that MoLS will be benefited from EARDIP subproject activities through IT job to be created, improved access to connectivity and access through shared digital infrastructures. Regarding E &S issues the ministry already engaged with EDFP and assigned one focal person to handle any E & S issues related to the subproject.

• Regional Level

- 47. As security condition is volatile the team is not able to conduct face to face regional and woreda or community level consultations for Somali and Gambella regions however, virtual consultation meeting were conducted with the Somali and Gambella regional state stakeholders (implementing, and partner) on Nov 07 and 16/2022 respectively. During the consultation, discussions were also held on devising feasible institutional arrangements necessary for implementation of the E & S risk management and on the recommendation necessary to fill any capacity gaps they have.
- 48. The community consultation by planning one representative sample, to undertake one community consultation in each of the target regions. As planned, the community consultation in Haweli Kebele along the Halli-Ellidar-Lofefelo connectivity route in Afar region has been conducted. It was held at the Galafi village on November 18, 2022 in which 18 participants took part. With the aim to capture the views and concerns of all segments in the local community including disadvantaged or vulnerable groups, the participants were composed of clan leader, religious leaders, community representative, women, youth, person with disability and refugee. However, the consultant has not been provided with the Bank security clearance to conduct the community consultation in the Bameza-Abugedaf connectivity route in Dima Woreda Gambella Region and Dollo-Oddo connectivity route in Dollo Woreda Somali Region. Also, the consultant made unsuccessful efforts to conduct community consultation through virtual meetings due to lack connectivity and other means of communications in the other two areas. It is believed that the client (MInT) was responsible for undertaking community consultation in the remaining two targeted spots either by deploying its own staff or in cooperation with its line ministries in the targeted regions. The client organization (MInT) was unable to do so. Lack of finance for per diem and logistics for transportation to the areas are given as an excuse. Therefore, the community consultation in Dima (Gambella), Bameza (Beneshangule) and Dollo Ado (Somali)are recommended for special consideration in the next phase of stakeholder consultation in the project.
- 49. Likewise, for the preparation of the project ESMF, community consultation has been conducted in Haweli Kebele in Halli-Dalho along Ethiopia-Djibouti connectivity route. It was held at the Galafi village on November 18, 2022 in which 18 participants took part. With the aim to capture the views and concerns of all segments in the local community including disadvantaged or vulnerable groups, the participants were composed of clan leader, religious leaders, community representative, women, youth, person with disability and refugee.
- 50. The purpose of consultation with project-affected communities and key stakeholders shown in **Table 3** was twofold. First, as part of an on-going project information disclosure, provide project information to allow stakeholders understand: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) potential benefits, risks and adverse impacts of the project; (iv) the proposed stakeholder engagement process highlighting the ways in which stakeholders can participate in designing, implementing and monitoring Resettlement Plans; and (v) the process and means by which grievances can be raised and will be addressed. Second, to assess the views and concerns of the stakeholders and incorporate inputs in the preparation of the E&S instruments for the EA-RDIP: ESMF, SA, RF, SMP, SEP, and GBV SEA/SH Risk Assessment, Prevention and Response Action Plan.

51. Key Outcome of Stakeholders Consultations

• The project is accepted by all federal and regional institutions including grass root level communities.

- Most of the federal institutions at federal level have World Bank project implementation experiences to comply with the World Bank and National ES requirements.
- Most of the federal stakeholder institutions are already involved in the host project (EDFP) so the assigned ES focal persons will serve to the new EARDIP.
- The institutional objectives for some of the stakeholder institutions such as EthERNet, NID, and MoTRI are same with the project objective.
- All government and public, federal, and regional institutions can identify the Environmental and Social risks and impacts due to the project components implementations.
- Some of the stakeholder institutions at federal levels such as EthERNet, ECA, MoTRI are well aware of the EARDIP project as tey were involved in the project preparation period.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

- 52. Stakeholder Identification and Analysis is a methodology used to facilitate inclusive and effective engagement by accounting for and incorporating the needs of those who have a 'stake' or an interest in the project. With information on stakeholders, their interests, and their capacity to impede or promote the project implementation, the SEP can choose how to best accommodate them, thus assuring successful management of the environmental and social risks and impacts of the project.
- 53. The first step in the process of stakeholder engagement is stakeholder identification-determining who are the key stakeholders of the project, and their key groupings and sub-groupings. From this flows stakeholder analysis, a more in-depth look at stakeholder group interests, how they will be affected and to what degree, and what influence they could have on the project. The answers to these questions will provide the basis from which to build the stakeholder engagement strategy. This section identifies and provide analysis on the key stakeholders who will be informed and consulted about the project.

4.1 Stakeholder defined

- 54. **Stakeholders** are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.
- 55. The *"stake"* that each of these different individuals or groups has in a project or investment will vary. For example, there may be people directly affected by the potential environmental or social impacts of a project. Others may be resident in another country altogether but wish to communicate their concerns or suggestions to the project implementing agency. Then there are those who might have great influence over the project, such as government regulators, political or religious leaders, and others active in the local community. There are also stakeholders who, because of their knowledge or stature, can contribute positively to the project, for example, by acting as an honest broker in mediating relationships.

4.2 Stakeholder Identification and Categorization

56. The range of stakeholders in the EA-RDIP relevant to consider for analysis varies according to the nature and scope of the project and its potential risks and impacts. Here it is important to keep in mind that not all stakeholders in a particular group or sub-group will necessarily share the same concerns or have unified opinions or priorities. Likewise, the strategies and intensity of engagement varies from one stakeholder group to the other. Backdrop to this, the types of stakeholders in the project are categorized into the following groups.

4.2.1 Project-affected parties

57. The term project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. For instance, project-related land acquisition or restrictions on land use may cause the physical displacement or relocation of individuals or groups into a new residential site or environment, particularly as the result of the undertaking of the linear construction under sub-component 1.1 and sub-component 1.2. Likewise, the project may have environmental risks during the construction phase as well as throughout its operation. One good example in this regard is the environmental and health risks from E-waste that may impact the local community in general. The identification of project affected parties in

Table 5 basis the discussions of the potential risks of the project to the physical environment, health, security, cultural practices, well-being, or livelihoods of the PAPs as presented under Section 1.3.

4.2.2 Other Interested Parties

58. Other interested parties in the EA-RDIP comprise individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation or implementation. Thus, *Table 5* identifies those other interested parties who may have in-depth knowledge about the environmental and social characteristics of the project area and populations and can help play a role in identifying risks, potential impacts, and opportunities for the project implementing organization MInT to consider and address in the assessment process.

4.2.3 Disadvantaged and/or Vulnerable Groups

- 59. Disadvantaged or vulnerable group refers to those who may be more likely to be adversely affected by the project and/or more limited than others in their ability to take advantage of the project's benefits. As a result, stakeholders in this category may have different concerns and priorities about project impacts, mitigation mechanisms, and benefits. Such an individual/group also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.
- 60. Depending on the societal context, women, children, youth, the elderly, people with disability, and minority groups may need to be considered as stakeholder groups of their own, and separate consultation formats may be needed to capture suggestions and concerns. *Table 5* provides a list of key stakeholder groups identified as disadvantaged or vulnerable groups.
- 61. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to political, socioeconomic, societal conflict, education, or practical factors. For example, barriers can exist for ethnic, linguistic, and religious minorities; low-income households; women; youth; persons with limited mobility; or persons with disabilities. Thus, the SEP for EA-RDIP deploy an array of strategies to mitigate these obstacles by focusing on issues of accessibility, communication, empowerment, and/or confidentiality.

4.2.4 Historically Underserved Communities (HUCs)

- 62. The use of the terminology Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities is not preferred by the Government of Ethiopia (GoE). Alternatively, to adhere to the preference of the GoE, the term Historically Underserved Communities (HUCs) is used in this SEP document to refer to a distinct social and cultural group in project areas possessing the characteristics specified in ESS7 (paragraph 8) in varying degrees:
 - (a) self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others;
 - (b) collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas;
 - (c) customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and

- (d) a distinct language or dialect, often different from the official language or languages of the country or region in which they reside.
- 63. In all the connectivity routes where the project proposed for linear construction works (fiber optics networking and access road), pastoral communities make-up the predominant inhabitants. As the provision in the Constitution of the FDRE (Article 89), these pastoral communities qualify the defining characteristics of HUCs set out in the WB's ESS7 (paragraph 78 and 9). Owing to the political, social, cultural, and economic characteristics distinct to the groups, the SEP identifies the project affected pastoral communities as stakeholder in their own.
- 64. The analysis of the SEP for EA-RDIP anticipate disproportionate adverse impacts of the project for the pastoral communities in the project areas. Also, they have distinct limitations in participating and/or in understanding the project information or participating in the consultation process. The disproportionate impacts emanate because:
 - (a) The economic, social, and legal status of the pastoral communities in project areas frequently limit their capacity to defend their rights to, and interests in, land, territories, and natural and cultural resources, and may restrict their ability to participate in and equally benefit from the project intervention.
 - (b) The lives of the pastoral communities are inextricably linked to the land on which they live and the natural resources on which they depend. They are therefore particularly vulnerable if their land is taken and/or access to natural resources is restricted due to the implementation of the project.
 - (c) Given the trends so far, the benefits of the development project are not devised or delivered to pastoral communities in a form that is culturally appropriate, and they may not always be adequately consulted about the design or implementation of projects that would profoundly affect their lives or communities. This may lead to the disproportionate project benefits and adverse impacts on pastoral communities unless mitigated in the SEP of the EA-RDIP.
- 65. Owing to the aforementioned anticipated disproportionate impacts of the project, the implementation of the EA-RDIP involves distinctive engagement strategies with regards to the project affected HUCs including but not limited to the following ones:
 - (a) The engagement process applies a meaningful consultation in a culturally appropriate and gender and inter-generationally inclusive manner by using the sampling techniques and criteria set by the consulting team and applying cultural information exchange ways for Afar, Dagu.
 - (b) In addition to the general requirements of stakeholder engagement set out in ESSs 1 and 10, the project will obtain the Free Prior and Informed Consent of the affected HUCs in circumstances in which the project-related land acquisition will: (i) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (i) cause relocation of the HUCs from land and natural resources subject to traditional ownership or under customary use or occupation; or (iii) have significant impacts on HUCs' cultural heritage that is material to their identity and/or cultural, ceremonial, or spiritual aspects.

Table 5 Mapping the Stakeholders in the EA-RDIP

Stakeholder Categorization	Identification of Specific Stakeholder	Status and Role	Mapping of Zonal Impact
Project-affected parities	 Individuals Families Groups Local community in general Project workers 	 Make a separate stakeholder because they may: Loss assets or means of livelihood due to project-related land acquisition; Physically displaced due to project-related land acquisition; Loss access to natural resources due project-related land acquisition or use; Impacted due to hazardous wastes from the project; Risk of child labour and minimum age; and/or Health hazards to project workers due to lack of safety measures. 	Local/project area level
	 Clan leaders Religious leaders Community representatives Kebele administration 	 Health hazards to project workers due to lack of safety measures. Make a separate stakeholder because they: Comprise part of local level project implementing arrangements (e.g. as members of Local Property Valuation Committee). Have in-depth knowledge of the local culture and contexts to articulate the potential environmental and social risks of the project that help for the assessment of the E&S risks and devising appropriate mitigation measures. Represent the interest of the local communities in the course of project implementation 	Local/project area level
	Woreda Rural Land Use and Administration Woreda Environmental Protection Office	 It is the key implementing agency in matters related to project land acquisition and associating involuntary resettlement and compensation. Partner implementing organization as member of Woreda Project Implementing Committee. It has interest with regard to the environment performance of the project. 	
Other interested parties	Woreda Women and Social Affairs Office	 Partner implementing organization as member of Woreda Project Implementing Committee. It represent the interest of women with regard to the disproportional adverse impacts and equal benefits of the project to women. 	Woreda and project area level
	Woreda Trade and Industry Office	 Partner implementing organization as member of Woreda Project Implementing Committee. It has interest in the regulation of trade and licensing of ICT based entrepreneurs 	

Stakeholder Categorization	Identification of Specific Stakeholder	Status and Role	Mapping of Zonal Impact
	Woreda Peace and Security Office	 Partner implementing organization as member of Woreda Project Implementing Committee. It has interest in project related security issues 	
	Regional Innovation, Science and Technology Commission	 It is the key implementing agency at the regional level 	
	 Regional Rural Land Use and Administration Bureau Regional Environmental Protection Bureau Regional Women and Social Affairs Bureau Regional Peace and Security Bureau Regional Administration 	 Under the overall coordination role of the Regional Innovation, Science and Technology Commission, these organizations form the implementing arrangements of the E&S instruments (LMP, E-Waste Management, RP, HUCP, SMP, and GBV Action Plan) of the project. That is: Heads of the respective bureau comprise Regional Project Steering Committee (RPSC). Expertise representing the respective bureau form Regional Project Technical Committee (RPTC) 	Regional level
	Ministry of Innovation and Technology	The main project implementing agency	
	 Ethiopian Communication Authority Ministry of Trade and Regional Integration Ministry of Finance Development Bank of Ethiopia Ethiopian Investment Commission Ministry of Labour and Skills Ethiopian Education and Research Network Ministry of Women and Social Affairs 	 Under the overall coordination role of the Ministry of Innovation and Technology, these organizations form the implementing arrangements of the E&S instruments (LMP, E-Waste Management, RP, HUCP, SMP, and GBV Action Plan) of the project. That is: Heads of the respective organization comprise Federal Project Steering Committee (FPSC). Appropriate expertise representing the respective organization form Federal Project Technical Committee (FPTC). 	Federal level

Stakeholder Categorization	Identification of Specific Stakeholder	Status and Role	Mapping of Zonal Impact
Disadvantaged or vulnerable groups	 Women Children People with disabilities Poor households The elderly Female headed households Unemployed youth Minorities 	 These make-up a separate stakeholder because: They may be more likely to be adversely affected by the project and/or more limited than others in their ability to take advantage of the project's benefits. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. Therefore, this groups needs speciation consideration in the SEP 	Local or project level
Historically Underserved Communities (HUCs)	Project affected pastoral communities	 The make-a separate stakeholder for the following reasons: HUCs have identities and aspirations that are distinct from mainstream groups in national societies. HUCs are inextricably linked to the land on which they live and the natural resources on which they depend. They are therefore particularly vulnerable if their land and resources are affected due to project related land acquisition and/or use. Often HUCs are disadvantaged by traditional models of development. Their economic, social, and legal status frequently limits their capacity to defend their rights to, and interests in, land, territories, and natural and cultural resources. Their ability to participate in and benefit from development projects is restricted for the same reasons just stated. Therefore, HUCs need a different strategy of engagement. 	Local or project level

4.3 Stakeholders' Level of Interest and Influence

- 66. An important measure called "effective power" (degree of power the stakeholder holds over other groups in relation to project implementation) is determined by weighting a combination of a stakeholder's *salience* and *influence*. In line with this, four major attributes are important for the Stakeholder Analysis in the project: (a) the stakeholders' position on the components of the project proposed for implementation; (b) the level of influence (power) they hold in this regard; (c) the level of interest they have regarding specific areas of the project; and (d) the group/coalition to which they belong or can reasonably be associated with. In each of these major attributes, the level of influence depends on the quantity and type of resources and power the stakeholder can marshal to promote its position. Broadly, these power attributes signal the capability the stakeholder has to impede or promote the project implementation.
- 67. The analysis of the stakeholders' level of interest and influence is done to help the SEP for the project to identify:
 - (a) Which individuals or organizations to include in the engagement;
 - (b) What roles they should play and at which stage;
 - (c) Who to build and nurture relationships with; and
 - (d) Who to inform and consult about the project in the course of implementation.

Figure 1 Matrix for Prioritizing Key Stakeholders in the SEP

DEGREE OF INFLUENCE

	High Influence	Low Influence	
High	Box A	Box B	
Importance	Stakeholders who stand to lose or gain significantly from the project AND whose actions can affect the project's ability to meet its objectives The SEP needs to ensure that their interests are fully represented beginning from project design throughout implementation. Overall success of the project implementation require effective engagement with these stakeholders.	Stakeholders who stand to lose or gain significantly from the project BUT whose actions cannot affect the project's ability to meet its objectives. The SEP needs to ensure that their interests are fully represented in the project design and continue throughout project implementation.	
DEGREE OF IMPORTANCE	Box C Stakeholders whose actions can affect the project's ability to meet its objectives BUT who do not stand to lose or gain much from the project. They may be a source of risk; and the project will need to explore means of monitoring and managing that risk through engaging the stakeholders.	Box D Stakeholders who do not stand to lose or gain much from the project <i>AND</i> whose actions cannot affect the project's ability to meet its objectives. They may require limited monitoring or informing of progress <i>but</i> are of low priority. They are unlikely to be the subject of project activities or involved in project management.	

- 68. *Figure 1* shows the matrix for prioritizing key stakeholders. Prioritizing which stakeholders are the most important to consider and indeed engage from the project design– involves two critical steps:
 - First, asking key questions: (a) Who stands to lose or gain significantly from the project implementation? (b) Whose actions could potentially affect the success of the project's implementation? Addressing the analysis of these vital questions helps to determine the number of stakeholder and intensity of stakeholder engagement. *Figure 2* presents the spectrum of stakeholder engagement in the EA-RDIP.
 - Then, position each one at the appropriate point between the axes. '*Importance'*, along the x axis, means the degree to which a stakeholder stands to lose or gain from the project. '*Influence'*, along the y axis, refers to the relative ability of a stakeholder to affect the success of the project's implementation.
 - Accordingly, as stated below, the prioritization in the SEP for EA-RDIP is determined based on the analysis of the stakeholders' interests in the project and the ways in which these interests may affect the project implementation.



Figure 2 Spectrum of Stakeholder Engagement in the EA-RDIP

- 69. **Stakeholders in Box A:** These are stakeholders with *high interest and high influence*. These are the most important stakeholders and their interests should be properly incorporated in the project through effective and continuous engagement. The PIU in the MINT and the E&S focal person, who will be hired by subprojects, will maintain close contact with these stakeholders. In addition, the PIU will organize quarterly consultations with the stakeholders where project or subproject officials will update the project status, including past activities in relation to the E&S risks management, the activities planned in coming months and the possible E&S risks and impacts, and record concerns, issues and suggestions raised by the stakeholders. At the end of every meeting Environmental and Social Safeguard Specialist in the PMU will readout the minutes and a copy of the minute will be made available to the participating stakeholders.
- 70. Stakeholders in Box B: These are stakeholders group with high interest but low influence. For this stakeholders group, the SEP needs to ensure all inclusive and interactive engagement throughout project implementation. Like stakeholders in Box A, stakeholders group in Box B is of high priority in the SEP. The E&S focal person will maintain regular contact and organize targeted consultations with the group on a quarterly basis. The PIU and the E&S focal person project will update the project status, including past activities in relation to the E&S risks management, the activities planned in coming months and the possible E&S risks. The E&S focal person will prepare a minute with signatures of the participants and the

minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting E&S focal person will readout the minutes and a copy of the minute will be made available to the local Kebele administration office.

Stakeholder Group	Specific Individuals, Groups, Communities or	Level of Analysis	
	Organizations	Interest	Influence
Project-affected parties	 Individuals Families Groups Local community in general Project workers 	High	Medium
	 Clan leaders Religious leaders Community representatives Kebele administration 	High	Medium
	 Woreda Rural Land Use and Administration Woreda Environmental Protection Office Woreda Women and Social Affairs Office Woreda Trade and Industry Office Woreda Peace and Security Office 	High	High
Other interested parties	 Regional Rural Land Use and Administration Bureau Regional Environmental Protection Bureau Regional Women and Social Affairs Bureau Regional Peace and Security Bureau Regional Administration 	High	High
	 Ethiopian Communication Authority Ministry of Trade and Regional Integration Ministry of Finance Development Bank of Ethiopia Ethiopian Investment Commission Ministry of Labour and Skills Ethiopian Education and Research Network Ministry of Women and Social Affairs 	High	High
Disadvantaged or vulnerable groups	 Women Children People with disabilities Poor households The elderly Female headed households Unemployed youth Minorities 	High	Low
Historically Underserved Communities (HUCs)	Project affected pastoral communities	High	Low

Table 6 Stakeholder Groups' Level of Interest and Influence on the Project Implementation

- 71. *Stakeholders in Box C:* These are stakeholders with *high influence but low interest.* The E&S focal person will maintain regular contacts and organize targeted consultations with the group in every six months: Update the project status, including past activities in relation to the E&S risks management, the activities planned in the coming six months and the possible E&S risks. The E&S focal person will prepare a minute with signatures of the participants and the minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting E&S focal person will readout the minutes and a copy of the minute will be made available to the participant through sending to their office or personal address.
- 72. *Stakeholders in Box D:* These are stakeholders with *low interest and low influence* on the success of the project implementation. They may require limited monitoring or informing of progress but are of low priority. They are unlikely to be the subject of project activities or involved in project management.
- 73. On the basis of the aforementioned Stakeholder Analysis, those Stakeholders in Box A and B are of high priority in the SEP for the EA-RDIP. The stakeholder in Box C will be considered with moderate priority. The stakeholders in Box D are not of the priority in the SEP. Accordingly, *Table 6* presents the level of interest and influence on the project implementation for those stakeholders identified in Section 4.1.

5 STAKEHOLDER ENGAGEMENT PROGRAM

74. The scope and level of detail of the SEP for EA-RDIP commensurate and proportionate with the nature and scale, potential risks, and impacts of the project and the concerns of the stakeholders who may be affected by or are interested in the project. Hence, stakeholder engagement program is an umbrella term encompassing a range of activities and interactions over the life of the project. This section and the ones to follow focus on the details of the stakeholder engagement program.

5.1 Purpose of Stakeholder Engagement Program

- 75. Stakeholder engagement is about building and maintaining constructive relationships over the lifecycle of the EA-RDIP. Thus, the purposes of a Stakeholder Engagement Program are to:
 - Take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. Then, to devise appropriate measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured.
 - Provide meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s).
 - Disseminate project information in advance of consultation activities and decision-making in ways and locations that make it easy for stakeholders to access it
 - Create a process that provides opportunities for stakeholders to express their views and concerns, and allows the project to consider and respond to them on time.
 - Have iterative or two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed.
 - Make inclusiveness in representation of views, including women, vulnerable and/or minority groups.
 - Develop clear mechanisms for responding to people's concerns, suggestions, and grievances.
 - Incorporate feedback into the project design and reporting back to stakeholders.

5.2 Proposed Strategies for Effective and Inclusive Engagement

5.2.1 Iterative approach

- 76. Regardless of what stage of the project consultation is taking place, the iterative nature of the consultation process is essential. Iterative consultation means:
 - Consultation is a two-way process of dialogue between the project implementing agency MInT and its stakeholders.
 - Stakeholder consultation is really about initiating and sustaining constructive external relationships over time. If the project starts the iterative process early and take a long-term, the strategic view is, in essence, developing its local "social license to operate."
 - In particular, for Component 1 of the project with high risks and adverse environmental and social impacts, consultation will not be a single conversation but a series of opportunities to create understanding about the project among those it will likely affect or interest, and to learn how these external parties view the project and its attendant risks, impacts, opportunities, and mitigation measures. Listening to stakeholder concerns and feedback can be a valuable source of information that can improve the project design and outcomes and help the project implementing agency MInT to identify and control external risks.
 - For MInT, iterative consultation process is an opportunity to get information, as well as to educate project implementing staffs about the local context in which the project take place, to raise issues and concerns, ask questions, and potentially help shape the project by making suggestions for MInT to consider and respond to.

5.2.2 Meaningful consultation

- 77. The project applies Meaningful Consultation Tailored to the affected Historically Underserved Communities (HUCs). To promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the engagement process with HUCs include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation in a culturally appropriate manner.
- 78. Approaches to meaningful consultation are most effective when they build on existing customary institutions and decision-making processes utilized by the project affected HUCs. The capacity of the existing institutions and decision-making processes to address any new issues that may arise due to the project are analyzed as part of the targeted social assessment and in consultation with the affected HUCs. Based on this analysis, additional measures to improve the capacity of the HUCs to actively engage can be put into place as necessary.
- 79. Meaningful consultation recognizes that the roles of men and women in HUCs' cultures are often different from those in the mainstream groups, and that women have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs. A meaningful consultation takes into account the different viewpoints based on gender while respecting traditional cultural approaches to consultations and decision making in the affected HUCs. In a gender-inclusive manner, the interests of both men and women are considered in all aspects of project planning and implementation.

5.2.3 Need specific approach

- 80. Various types of barriers may influence the capacity of the HUCs and disadvantaged or vulnerable groups to articulate their concerns and priorities about the project impacts. These barriers can be linked to sociopolitical, societal conflict, educational, or practical factors. To address such barriers, therefore, the SEP devise differentiated approaches.
- 81. It is particularly important to understand project impacts and whether they may disproportionately fall on the disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of the project. In such cases, the SEP devise an array of strategies tailored to the need of the specific group in question. The following can help outline the differential approach to understand the viewpoints of these groups:
 - Identify vulnerable or disadvantaged individuals or groups and the limitations they have in
 participating and/or in understanding the project information or participating in the consultation
 process.
 - What might prevent these individuals and groups from participating in the planned consultation process? (For example, language differences, lack of transportation to events, inaccessibility of venues, disability, lack of understanding of a consultation process).
 - How do they normally get information about the community and projects activities?
 - Do they have limitations about time of day or location for public consultation?
- 82. Accordingly, the SEP apply additional support or resources that might be needed to enable these people to participate in the consultation process. Examples include: providing translation into a minority language, sign language, large print or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting...etc.

5.2.4 Obtaining Free, Prior, and Informed Consent (FPIC)

- 83. As described under the social risks of the project, HUCs may be particularly vulnerable to the loss of, alienation from, or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements set out in ESSs 1 and 10, the project implementing agency MINT will obtain the FPIC of the affected HUCs in circumstances in which the project will:
 - (a) Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
 - (b) Cause relocation of HUCs from land and natural resources subject to traditional ownership or under customary use or occupation; or
 - (c) Have significant impacts on HUCs' cultural heritage that is material to their identity and/or cultural, ceremonial, or spiritual lives.

5.3 Proposed Methods for Consultation

84. Achieving the above-mentioned strategies of consultation essentially depend on the use of multiple methods and sources of information for triangulation. To this end, various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions. These include the following ones.

- 85. **Combination of methods for project information disclosure**: The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility). The formats to provide information may include presentation printouts, nontechnical summaries, project leaflets, and pamphlets, posting on community public notice boards.
- 86. *Public/community consultation*: There is no one right way of undertaking public consultation. Given its nature, the process will always be context-specific. This means that techniques, methods, approaches and timetables will need to be tailored for the local situation and the various types of stakeholders being consulted. According to the core values of the International Association for Public participation, public consultation is:
 - i. Planned early enough to scope key issues and have an effect on the project decisions to which they relate. What are the strategic reasons for consulting with stakeholders at this particular phase of the project? These may span a wide range of objectives, from meeting regulatory requirements and negotiating compensation, to obtaining access to community land for survey work, building trust relationships, or managing expectations in general.
 - ii. Targeted at those most likely to be affected by the project. So that the public should have a say in decisions about actions that could affect their lives.
 - iii. Includes the promise that the public's contribution will influence the decision. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decisionmakers.
 - iv. Informed as a result of relevant information being disseminated in advance.
 - v. Gender-inclusive through awareness that men and women often have differing views and needs.
 - vi. Localized to reflect appropriate timeframes, context, and local languages.
 - vii. Documented to keep track of who has been consulted and the key issues raised.
 - viii. Reported back in a timely way to those consulted, with clarification of next steps.
 - ix. Free from manipulation or coercion.
 - x. Ongoing as required during the life of the project.
- 87. *Workshops:* The workshops with experts will be held to consult on the revision and development of new policies and normative documents. Also, several workshops with stakeholders will be carried out. The main topics of these workshops will include raising stakeholder awareness on project benefits, establishing project implementation procedure, timing for project implementation, GRM and GBV. Other topics relevant for these workshops will be identified during project implementation as necessary.
- 88. **Consultation with stakeholder representatives**: Identifying stakeholder representatives and consulting with and through them can be an efficient way to disseminate information to large numbers of stakeholders and receive information from them. When working to determine representatives, however, there are a number of factors worth considering. First, try to ensure that these individuals are indeed true advocates of the views of their constituents, and can be relied upon to faithfully communicate the results of engagement with the project staffs back to their constituents. One way to do this is to seek verification that the right representatives have been engaged, by talking directly to a sample of project-affected people. Ground-truthing the views of the designated representatives in this way can help highlight any inconsistencies in how stakeholder views are being represented. Legitimate stakeholder representatives

could be but are not limited to: (a) elected representatives of regional, local, and village councils; (b) traditional representatives, such as village headmen or tribal leaders and religious leaders; and (c) leaders of community-based organizations such as local women's and youth's group.

- 89. **Differential methods for people with special need**: The engagement with people with special need employs differential method. Relevant project information should also be accessible for stakeholders with sensory disabilities, for instance, through providing documents in Braille or engaging a sign language interpreter at a consultation meeting, as appropriate. In cases where literacy levels are low such as pastoral areas, additional formats like location sketches, physical models, and presentation of video records are used to communicate relevant project information.
- 90. Beneficiary surveys complemented by local snapshots and focus groups: The surveys will be advertised and conducted every six months through the online platform. The local snapshots will accompany the survey, aim to reach those who are not able to provide online feedback and consist of phone conversations, focus groups and door-to-door visits. Therefore, the Beneficiary surveys can be conducted via online Platform and computer-assisted telephone interviewing (CATI)⁵ and focus group discussions via online communication platforms like ZOOM.
- 91. *In-depth interviews with relevant experts:* Expert's views and recommendations on various project issues and challenges are valuable and have been conducted as part of the social assessment. They will continue to be used as part of specific project activities.
- 92. *Information, Communication and Education (IEC) materials Leaflets/ informative notes:* Leaflets within formation that might present more interest for affected parties, such as the benefits of proposed investments, will be developed and distributed in the meetings/ stakeholder consultations.
- 93. *Webpage/platform*: For those with knowhow and have access to use, a dedicated webpage/platform will be created for the project to enable users to find all the information about the project. The goal of the platform is to provide core information about the project and to ensure accessible online feedback to project stakeholders and to support several stakeholder engagement activities. The platform will also be used to publish all ESF documents including ESMPs, and RAPs for specific sub-projects, and other relevant information related to project implementation. The platform will be used to support face-to-face consultations through digital feedback surveys at regular intervals and will provide a dedicated portal for the identified sub-projects to inform the population and engage them in providing feedback and support monitoring through the implementation cycle. All stakeholder consultations events will be advertised through this platform.
- 94. Letters: Letters will be an instrument used in order to facilitate the project implementation process through good collaboration between the implementing entities and other stakeholders.
- 95. *Reports:* The reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project. The frequency and type of reports will be identified as necessary.
- 96. E-mails: Emails will be used to facilitate communication between implementing entities throughout the project lifecycle.

⁵ Telephone interviews should be considered for elderly people, and other vulnerable groups without access to internet connection. Due to COVID-19 transmission risk, face to face surveys are not recommended.
- 97. **Grievance Mechanism (GM):** A project-level GM will be established in line with the World Bank's ESS-10 requirements. A dedicated grievance mechanism will be set up for the project. The stakeholders will be able to raise grievances anonymously by phone, online or using the project digital platform.
- 98. *Grievance Log:* Where grievances, including those delivered through the online platform, are registered (including grievance delivered by letter mail or in writing) and maintained, followed up and resolved through a database.

5.4 Timeframe for Stakeholder Engagement

- 99. Because project circumstances and stakeholder concerns can change or new ones may emerge, stakeholder engagement is conducted throughout the project cycle. The project life cycle starts with the identification of a proposed project; proceeds through the development of the project (project design/preparation); assessment of potential environmental and social risks and impacts; and project implementation; and ends with the closure and decommissioning of the project. Therefore, project-related stakeholder engagement starts at project identification and continues until closure of the project. Accordingly, the SEP needs to be updated during project implementation. This allows improvement to project implementation based on stakeholder feedback, and proactive management of concerns.
- 100. The project implementing agency the MInT will continue to conduct stakeholder engagement in accordance with the SEP in *Table 7* and will build upon the channels of communication and engagement already established with stakeholders. In particular, the MInT will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures as agreed in the ESCP.

5.5 Documentation of Stakeholder Engagement

- 101. Documentation of stakeholder engagement should be published in a timely fashion in relevant local languages through channels that are accessible to stakeholders. This documentation includes the following, as appropriate:
 - (a) Date and location of each meeting, with copy of the notification to stakeholders.
 - (b) The purpose of the engagement (for example, to inform stakeholders of an intended project or to gather their views on potential environmental and social impacts of an intended project).
 - (c) The form of engagement and consultation (for example, face-to-face meetings such as town halls or workshops, focus groups, written consultations, online consultations).
 - (d) Number of participants and categories of participants.
 - (e) A list of relevant documentation disclosed to participants.
 - (f) Summary of main points and concerns raised by stakeholders.
 - (g) Summary of how stakeholder concerns were responded to and taken into account.
 - (h) Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions.
 - (i) Photographs, minutes of the discussion and agreements

5.6 Stakeholder Engagement Plan

102. The use of the framework approach is appropriate as the EA-RDIP has multiple sub-components that will only be designed during project implementation. At this stage, therefore, the framework shown in *Table 7* sets out the principles to be followed for stakeholder engagement in a manner that is consistent with ESS10 and indicates how people are notified as key information becomes known. However, the Stakeholder Engagement Plan presented in the table will be updated as and when the specific details of the E&S risks and adverse impacts of the project sub-components become known.

Project	Engagement	Topic(s) of Engagement	Target	Methods of	Frequency and	Stakeholder Feedback	Responsibilitie
Stage	Objective		Stakeholders	Engagement	Location	Opportunity	S
Project preparation Phase: Scoping, Design, E&S Instruments Preparation and Disclosure	Disclose relevant project information to stakeholders and solicit their inputs/feedbac k into ESMF, E- WM, RAP, HUCP, SMP, SEP, GBV RA&AP and other plans.	Dissemination of project details, including project components, possible positive impacts, E&S risks and mitigation measures; project E&S policies and principles; project-related land acquisition and association resettlement compensation processes; resettlement and livelihood restoration options; project information disclosure mechanism; GRM process; project benefit sharing packages; consultation with HUCs and the FPIC process.	Project-affected parties; other interested parties federal to woreda level; disadvantaged or vulnerable groups (DVGs); Historically Underserved Communities(HU Cs)	Community consultation; consultation with stakeholder representatives; interviews with heads and expertise of other interested parties from federal to woreda level; separate interview with Disadvantaged and/or Vulnerable Groups () and Historically Underserved Communities (HUCs)	Once for project information disclosure and inputs for the assessments of the E&S instruments at local village and office visit	-MInT project staffs or designated consultants hear feedbacks & suggestions from the PAPs and other interested parties during project information disclosure and assessments for E&S instruments. -In addition, representatives of other interested parties, project-affected parties will be invited to validation workshop for comments and feedbacks on E&S instruments.	-The PIU at the MInT -Designated consultants
Project preparation Phase: Scoping, Design		ESMF, LMP, E-WM, RF, ESCP, SEP, SMP, GBV RA&AP disclosures; land acquisition process; resettlement and livelihood restoration options (if needed); project scope, rationale and E&S principles; Grievance Mechanism process	Project-affected parties (PAPs); Other interested parties federal to woredal level; DVGs; HUCs)	Separate consultative meetings with PAPs, representatives of other interested parties federal to woreda level, representatives of DVGs and HUCs (clan leaders); project leaflets and pamphlets; posting on community public notice boards; dedicated project webpage/platform	Consultative meeting in affected villages throughout RAP development as needed; bi- annual consultative meeting with representatives of other interested parties at federal and woreda level; webpage based disclosure throughout	-Face-to-face feedbacks during consultative meeting; online/dedicated portal for feedback from stakeholders; digital feedback surveys of stakeholders at regular intervals.	-The PIU at the MInT -Regional project focal persons.

Table 7 Stakeholder Engagement Plan

Project Stage	Engagement Objective	Topic(s) of Engagement	Target Stakeholders	Methods of Engagement	Frequency and Location	Stakeholder Feedback Opportunity	Responsibilities
		Project alternatives, scope of the potential impacts and mitigation measures and benefit sharing Coordination activities for development and implementation of management plans.	Stakeholders of all groups and at all levels including PAPs, DVGs, HUCs, and representatives of concerned government agencies and other interested parties from federal to woreda level	Consultative meeting with stakeholders of all groups and levels	At least once in every three months at community level and six months at regional and federal level or as and when required	Regular consultations with the PAPs and stakeholders through project office and E&S focal person and through functioning GRM	-The PIU at the MInT -Regional project focal persons.
		Project scope, rationale and E&S principles	All stakeholders with some sort of interest and influence (as categorized under Boxes A, B and C in <i>Figure 1</i>) on the success of project implementation.	Mass/Social Media communication; Disclosure of written information including brochures, posters, flyers, website, posting on community notice board.	-Continuous broadcasting through Mass/Social Media on project scope, rationale and E&S principles for two months before project commencement. -Disclosure of written information at each affected local village/kebele through the project lifecycle.	The use of Mass/Social Media communication allows feedback from stakeholders of all categories and location including project affected local villages/kebeles.	-The PIU at the MInT -Regional project focal persons. -Contracted Media Outlets (in federal, regional and local level) by the MInT

Project Stage	Engagement Objective	Topic(s) of Engagement	Target Stakeholders	Methods of Engagement	Frequency and Location	Stakeholder Feedback Opportunity	Responsibilities
		Project-related land acquisition, resettlement, compensation payment, procedures, legal compliance issues	All individual, groups or communities affected due to project-related land acquisition	consultation with affected individuals, groups and communities; consultation with community representatives; separate consultation with DVGs and HUCs and their representatives	Every monthly at village/kebele level in the process of land acquisition and before displacement but quarterly meeting throughout the implementation of RAP -consultation with community representative when and as need	Concerns and feedback from PAPs at every monthly or quarterly consultative meeting	-The PIU at the MInT -Regional project focal persons.
		Training on ESMF/ESMP requirements and other management plans; Grievance Mechanism process; E&S requirements; GBV	Project implementing arrangements from federal to local level; other interest parties	Face-to-face meetings; Trainings/workshop; Invitations to public/community meetings	-Once at federal, regional and woreda level before commencing the project	Feedback from participants during training	-The PIU at the MInT -Regional project focal persons.
Pre-Project Construction Phase	Consolidate engagement activities to prepare stakeholders for construction phase Present Construction Contractors ESMPs and related plans, and final ESCP	Present ESMPs and Contractor Environmental and Social Management Plans (C-ESMP), ESCP and ES&S plans to construction contractors for comments & feedback Project updates including construction activities, construction management plans, engagement activities and responsibilities	Project contractors, project implementing arrangements from federal to woreda level	Consultative meeting, project Information factsheets and documents, FAQs, project website and hotline	Continuous throughout the last two months before the commencement of the project sub-components involving construction works.	Feedbacks through regular meeting as a group or individual contractor firm	-MInT -PIU -Concerned ministry, regional or woreda level government agencies

Project Stage	Engagement Objective	Topic(s) of Engagement	Target Stakeholders	Methods of Engagement	Frequency and Location	Stakeholder Feedback Opportunity	Responsibilities
		Construction permits and licenses and regular Project progress and updates.	Hired project contractors, concerned federal, regional and woreda level government agencies	One-to-one meetings, Group meetings/ briefing	Once a month or as when required.	Circulation of meeting minutes and feedback forms	-PIU -E&S team of the project in support of contractors
		Present the C-ESMP and related plans for comments and feedback; Present final ESCP for feedback; Project updates including construction activities, construction management plans, engagement activities and responsibilities	Hired project contractors, concerned federal, regional and woreda level government agencies	Consultative workshops, group and one to one meetings.	Continuous throughout the last two months before the commencement of the project sub- components involving construction works.	Feedbacks through regular meeting as a group or individual contractor firm	-MInT -PIU -Concerned ministry, regional or woreda level government agencies
		Identify stakeholders most likely to be affected by construction; Notify local stakeholders of construction activities (the purpose and nature of the construction activities: the start date and duration, potential impacts, information on whom to contact if there are concerns/complaints related to the contractors.	For communities living near to a project site, the effects of noise, dust, vibration, traffic, and lighting associated with construction can cause disturbances and emotional stress, as well as pose a physical or health hazard.	There are a number of ways this information can be communicated, including roadside signs, poster boards in public places, newsletters, door-to- door leaflets, and via stakeholder representatives or public meetings.	Ahead of two months at each project construction sites.	Feedbacks through regular meeting as a group or individual contractor firm	Project Construction Contractors

Project Stage	Engagement Objective	Topic(s) of Engagement	Target Stakeholders	Methods of Engagement	Frequency and Location	Stakeholder Feedback Opportunity	Responsibilities
	Provide regular updates on construction activities to PAPs and other stakeholders; Implement and monitor the implementation of ESMP Handling of	Regularly update on construction activities including key changes in the Project design; monitoring results from the ESCP and ESMPs; and Health and safety impacts.	Project-affected parties and other interested parties	Project Information Sheets, such as brochures and factsheets; feedbacks from community meetings; Monitoring and Community Perception Surveys; Project Facebook and website	Every three months or as when required for communities in and around the construction site. Every six months for other interested parties from federal to woreda level.	Feedback through community meetings and community perception survey	The PIU, Project Area Focal Person, and Construction Contractors.
C onstruction Phase	complaints in a prompt and effective manner	Ongoing engagement during construction and operations; Regular engagement with PAPs to maintain good relationships and provide update on the Project progress.	Project-affected parties	Grievance mechanisms; quarterly sample survey with project affected communities; consultation with community, DVGs and HUCs representatives.	Ongoing GRM and consultation with community, DVGs and HUCS representatives Quarterly sample survey with PAPs	Receiving feedbacks from the ongoing consultation with representatives of PAPs including DVGs and HUCs	The PIU, Project Area Focal Person, and Construction Contractors.
		Engagement on new stakeholder issues and concerns that may arise	Project-affected parties	Grievance mechanisms; quarterly sample survey with project affected communities; consultation with community, DVGs and HUCs representatives.	Ongoing GRM and consultation with community, DVGs and HUCS representatives Quarterly sample survey with PAPs	Receiving feedbacks from the ongoing consultation with representatives of PAPs including DVGs and HUCs	The PIU, Project Area Focal Person, and Construction Contractors.

6 INFORMATION DISCLOSURE

104. Project information disclosure is a formal-sounding term for making information accessible to the affected and interested parties. Communicating relevant project information in a manner that is understandable to the target stakeholders is an important first step in the process of stakeholder engagement. Below are the key topics of focus in project-related information disclosure.

6.1 The Purpose of Project Information Disclosure

- 105. Provide relevant project-related information to targeted stakeholders in advance of decision-making. At a minimum, explain next steps and be clear about which project elements are fixed and which can be changed or improved upon, based on consultation and participatory inputs.
- 106. Provide meaningful information tailored to the target stakeholder group. Provide relevant project-related information in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility).
- 107. Give stakeholder project-related information they need to participate in an informed manner. Communicating project information in a manner that is understandable to all stakeholders (projectaffected parties as well as other interested parties) is an important first step in the process of stakeholder engagement. All other activities, from consultation and informed participation to negotiation and resolution of grievances, will be more constructive if stakeholders, particularly project affected communities, have accurate and timely information about the project, its impacts, and any other aspects that may have an effect on them.

6.2 Information to be Disclosed

- 108. As required in ESS10, paragraph 19, MInT will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. *Table 8* presents details of proposed project information disclosure approach. Among other things, MInT will provide stakeholders with access to the following information as early as possible before the Bank proceeds to project appraisal, and in a time frame that enables meaningful consultations with stakeholders on project design:
 - (a) The purpose, nature, and scale of the project;
 - (b) The duration of proposed project activities;
 - (c) Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups, and describing the differentiated measures taken to avoid and minimize these;
 - (d) The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
 - (e) The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
 - (f) The process and means by which grievances can be raised and will be addressed.

6.3 Timeframe for Project-Related Information Disclosure

109. Making available project-related information as early as possible in the project cycle and in a manner, format, and language appropriate for each stakeholder group is important. Then, it is important to remain

responsive to requests for project-related information from the project-affected parties and other interested parties throughout the project cycle. It is helpful to set up appropriate systems to make project information available on a continuous basis. For instance, creating dedicated project website, use of hotlines, and Mass Media may be useful to provide, and regularly update, project-related information.

110. As the implementation of the project progresses, new impacts may arise, while other impacts may be eliminated. Thus, the MInT provide regular updates to stakeholders on project performance and changes in scope or schedule. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the MInT will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. Then, MInT will disclose an updated ESCP, setting out any additional mitigation measures.

6.4 Proposed Strategies to Incorporate the Views the DVGs

- 111. The principle of inclusiveness will guide the stakeholder engagements, particularly with respect to vulnerable individuals and groups. In cases where vulnerable status may lead to people's reluctance or physical incapacity to participate in large-scale community meetings, the project will hold separate small group discussions with them at an easily accessible venue. This way, the project will reach out to groups who, under normal circumstances, may be insufficiently represented at general community gatherings. Some strategies to be adopted to reach out to these groups include:
 - (a) Making project-related documentation accessible for people with sensory disabilities, for instance, through providing documents in Braille or engaging a sign language interpreter at a consultation meeting, as appropriate.
 - (b) In cases where stakeholder's literacy levels are low such as project-affected HUCs in pastoral areas, additional formats like location sketches, physical models, and film presentations may be useful to communicate relevant project information. Also, MInT should help the project-affected communities with low literacy level to understand technical documents, for instance, through the publication of simplified summaries, and nontechnical background explanations, or access.
 - (c) Identify leaders of vulnerable and marginalized groups to reach-out to these groups.
 - (d) Through the existing industry associations, maintain a database of marginalized groups, e.g., Federation of Disabled Persons.
 - (e) Leverage existing national infrastructure development and other relevant projects which include vulnerable populations who overlap with this project to use their systems to identify and engage them.
 - (f) Engage community leaders, CSOs and NGOs working with vulnerable groups
 - (g) Organize face-to-face focus group discussions with these populations
 - (h) Women focused groups: The project and sub-project will facilitate formation of a focus group for women, which will be led by a female facilitator, and will provide a platform to discuss any issues and concerns that the women may have regarding the Project development. This will particularly ensure that female project workers have the opportunities to participate in and benefit from the project. The E&S team will hire a woman as the facilitator and will keep record of issue of discussions in the meeting of such group. The project and sub-project teams will put maximum efforts to address the genuine concerns of the women group.
 - (i) FGDs with historically underserved communities (HUCs): Project and sub-project will give priority to have effective and meaningful consultations with the identified HUCs groups.
 - (j) Household visits: Project and sub-project will give priority to individual household visits, particularly those that are in absolute poverty, female headed households, people with disability, the elderly who have mobility difficulties, and households of minority religious groups to ensure

they are aware of Project developments. During the visits, the targeted households can also raise questions and concerns freely without intimidation, discomfort or ridicule.

- (k) School visits: Project and sub-projects will conduct school visits to disseminate Project information and consult with students and teachers about potential impacts and benefits. Such initiatives will also be used as an opportunity to share project-related information to schoolteachers and students, which the project believes is an effective way to reach out the broader community, as teachers are important influencers in the community and students often bring information collected from school to share with their families.
- (I) Consultations in local language: Most HUCs in the Project affected areas speak local languages, but some individuals may experience language issues. So, the E&S field team, if necessary, will hold small group meetings in local HUCs language to explain printed disclosure materials for people who are not literate or problem in reading/understanding. They will also assist HUCs in how to provide comments, feedback and raise grievances.
- (m) Consultations in appropriate manner: While reaching out to different groups particularly vulnerable groups such as marginalized pastoralist and semi-pastoralists, women, elderly and disabled, the project and sub-project teams will make sure time and location of consultation are appropriate to their needs. In addition, the teams will make sure that all the HUC groups are adequately informed about the consultations at least one week prior to the schedules date.

6.5 Project Information Disclosure Plan

112. As stated above, the SEP will remain in the public domain for the entire period of project lifecycle and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification and updates of emerging E&S risks and adverse impacts of the project on the affected parties. Making available project-related information to stakeholders in need as early as possible and on an ongoing basis in a manner and language appropriate for each target stakeholder group require MInT to employ various methods of disclosure including use of Mass Media such as community radio, presentation printouts, nontechnical summaries, project leaflets and pamphlets. Backdrop to the key topics of project information disclosure highlighted above, the outline presented in *Table 8* summarizes the main target stakeholders of the project, types of information to be disclosed, and proposed means/methods of disclosure.

Project Stage	List of Information to be Disclosed	Methods Proposed	Timetable: Location and Date	Target Stakeholder	Responsibilities
ration and Disclosure	Information on proposed alternatives in project design and location options that explains the different design options (including the "no project" scenario), and what each option will mean for the different stakeholder groups; Identify project stakeholders and their interests.	Consultation meeting, email communication, virtual meetings	-A half-day consultative meeting at Addis Ababa; regular email communication and virtual meetings.	 -Representatives of the potential main and partner project implementing agencies. -Selective representatives of the proposed affected-communities (e.g. clan leaders) 	MInT Top Management and the PIU
sign, E&S Instruments Prepa	The purpose, nature, and scale of the project; the duration of proposed project activities; potential E&S risks and impacts of the project and proposed mitigation measures including differentiated measures for DVGs; proposed stakeholder engagement and GRM process.	Public/community consultation, consultation with representatives of project-affected community and DVGs	-Public/community consultation once at the sampled project affected kebeles, individual consultation at target regions and sampled woredas during fieldwork for the preparation of ESMF	-Project-affected communities and representatives; representatives of DVGs and HUCs; leaders and expertise of potential partner implementing agencies from region to woreda level	PIU at MInT or designated consultants
Preparation Phase: Scoping, Design, E&S Instruments Preparation and Disclosure	Disclosure of E&S management instruments ESMF, LMP, E-WM, SMP, RF, SEP, GBV RA&AP	Public notices; electronic publications and press releases on the project website; dissemination of hard copies at designated public locations; press releases in the local media; project brochures and leaflets; separate focus group meetings with DVGs, as appropriate; providing documents in Braille or engaging a sign language interpreter as needed.	Radio broadcasting daily all through month of disclosure throughout project-affected areas; regular access on dedicated project webpage; consultation with DVGs or representatives at project affected kebeles daily in weeks of disclosure as needed.	Project-affected communities; representatives of PAPs and DVGs; concerned government agencies and NGOs	PIU at MInT

Project Stage	List of Information to be Disclosed	Methods Proposed	Timetable: Location and Date	Target Stakeholder	Responsibilities
Pre-Project Implementation Phase	Disclosure of the draft ESIA report and management plans and Resettlement Action Plan where relevant.	Public notices; electronic publications and press releases on the project website; dissemination of hard copies at designated public locations such as local government offices; press releases in the local media; project brochures and leaflets; separate focus group meetings with DVGs, as appropriate; providing documents in Braille or engaging a sign language interpreter as needed.	 -For continuous two months before project implementation. -Hardcopy printout deposited in a range of publicly accessible places, taking into consideration transportation costs, printing and translation costs, the time allowed for viewing the documents, and the timing of access (e.g. at weekends). Locations might include: municipal and central government offices; public libraries; local community centers; offices of NGOs operating at national and project areas; community-based organizations; -Web links may be provided to relevant documents prepared By the government. 	All project-affected parties and other interested parties	Project implementing agency (MInT)
Pre-Proj	Disclosure of Executive Summary of the final ESIA report. Produce an Executive Summary of the ESIA documents in a simple, easily understandable format, with consideration to illustrations, local languages and literacy levels. The summary should focus on key impacts and mitigation measures and provide an outline of future proposals for stakeholder consultation, such as ongoing site visits, monitoring programs, and open-door policies.	Dissemination of hard copies at designated public locations; project brochures and leaflets; separate focus group meetings with DVGs, as appropriate; providing documents in Braille or engaging a sign language interpreter as needed.	-For about two months prior to project implementation at all project-affected kebeles.	-The need for distributing the Executive Summary is driven by the need to inform those most vulnerable and disadvantaged by the project and HUCs -Also, by the need to build constructive relationships with a wide range of stakeholders	Project implementing agency (MInT)

Project Stage	List of Information to be Disclosed	Methods Proposed	Timetable: Location and Date	Target Stakeholder	Responsibilities
	Disclosure of Project Grievance Procedure; Updates on Project development.	Staff handbook; email updates covering the Project staff and personnel' Regular meetings with the staff; Posts on information boards in the offices and on site; Reports, leaflets.	Throughout project implementation period at each project construction site, project implementing offices from MInT to project local area focal offices	Project employees hired by MInT and the construction contractors	MInT and Project Construction Contractors
Implementation Phase	Continue to disclose, consult, and report to stakeholders as needed on topics such as monitoring of ESIA or other commitments; changes to project design and operational procedures that may cause emerging E&S risks and impacts; any unforeseen impacts or developments.	Consultative meeting/workshops	Quarterly community consultation at project site level but consultation with community representatives when and as need; consultative meeting/workshops with other interested parties from federal to woreda level.	All project-affected parties and other interested parities	PIU at MInT and Focal area project staffs
Implem	Provide regular updates and progress reports to stakeholders focusing on issues of greatest concern to PAPS including: resettlement compensation benefits, re-employment opportunities, and training and local enterprise support; community health, safety, hazards, and other risks; progress in the physical relocation; environmental and ecological rehabilitation; future status of services and infrastructure.	Community consultation, consultation with community representatives, separate consultation with DVGs and HUCs or their representatives.	Bi-annual meeting with PAPs in all sites where the project-related land acquisition caused economic and/or physical displacement and when and as required.	PAPs	PIU at MInT and Focal area project staffs

7 RESOURCES AND RESPONSIBILITIES

113. Most importantly, stakeholder engagement should be managed as one would manage any other business function — with clearly defined objectives and targets, professional, dedicated staff, established timelines and budget, and senior management responsibility and oversight. The below sub-sections highlights on the required resources and responsibilities in effecting the SEP for EA-RDIP.

7.1 Resources

114. Both human and financial resources are required for the successful implementation of the SEP for the Project Preparation activities and as well as the Project implementation. The Project Implementation Unit at the MInT will deploy competent and qualified Environmental Specialist and Social Development Specialists who will be responsible for ensuring effective implementation of the SEP. The budget for the implementation of the SEP will be financed by resources from the project through use of contractors and supervision consultants hired by the PIU.

		Unit	Total cost	
Item	Quantity	cost	(USD)	Remarks
Periodic stakeholder				On average once,
consultations/stakeholder engagement				a quarter for 5
surveys	20	30,000	600,000	years
Hiring of third party experts to assist in				
stakeholder identification and				Lump sum for 5
comprehensive engagement	2		20,000	years
Capacity building for stakeholder				
engagement and delivery and support to				
public awareness campaign (pieces of				Lump sum for 5
training, workshops stakeholders)	25		50,000	years
				Lump sum
Project information (preparation of				(around per year
webinars/video and GRM PR-materials)			50,000	for 5 years
Project website creation and maintenance				
(online platform)			200,000	for 5 years
Technical support (WEBEX, Zoom) for				
conducting of online public, consultations,				Lump sum
meetings with communities, interested				(around per
parties			50,000	year for 5 years)
				All project
Information materials development				implementation
(brochures, leaflets, posters, other items)			50,000	phases
Project midterm review meetings with				
relevant stakeholders	1		100,000	
Project phase out meetings; engage				
stakeholders on project exit strategy	1		100,000	
Total			1,400,000	

Table 9 Project Estimated Costs for the Implementation of SEP Activities (in USD)

7.2 Management Functions and Responsibilities

115. The effective implementation of the SEP for EA-RDIP fall under the management functions and responsibilities of both the project implementing agency MInT and Project Contractors as highlighted below.

7.2.1 The project implementing agency (MInT)

- 116. The environmental and social safeguard specialist of the PIU at MInT is responsible for the overall management functions of the SEP. This management function require incorporating stakeholder engagement activities into the project's environmental and social management system. In practice this means making its management systematic by integrating it with core project E&S activities. To achieve this, the PIU will need to identify critical points in the life of the project where stakeholder engagement will be needed, and determine who will deliver these actions and how they can be integrated with core project's E&S performance. This involves trying to work out how best to deliver and integrate a number of different aspects of stakeholder engagement discussed in the previous sections, including:
 - (a) Ongoing stakeholder analysis and the assessment of stakeholder concerns from a "risk" perspective.
 - (b) Consultation processes designed to meet the project's own policies and/or compliance requirements of the national regulators and WB E&S policies.
 - (c) Input and suggestions received from stakeholders on project design and proposed mitigation measures.
 - (d) Grievance mechanisms that capture and respond to stakeholder concerns.
 - (e) The involvement of local stakeholders in project monitoring.
 - (f) Reporting information to stakeholders.
- 117. Besides the overall coordination role of by the environmental and social safeguard specialist of the PIU at MInT, effective implementation of the SEP requires MInT to hire, train, and deploy the right project area focal personnel (one at each Connectivity Route intended with the linear construction works, the networking of fiber optics and access road). Alongside other project-related duties, the project focal personnel discharge their responsibility as the community liaison regarding issues of stakeholder engagement by project-affected communities. When hiring project area focal personnel, consider people who will be able to develop and maintain good working relationships with the project-affected communities. Since their job will involve listening and responding to the concerns and suggestions by local communities, qualities to look for include:
 - (a) A good communication skills.
 - (b) A good understanding of the local language and community/cultural dynamics.
 - (c) Open-mindedness and respect for the views of others.
 - (d) A solution-oriented approach.
 - (e) A high integrity/degree of trustworthiness.
 - (f) A genuine commitment to the position and its goals.

7.2.2 Project Contractors (PCs)

118. Perhaps more than other third parties, contractors have the potential to directly impact stakeholder relations through their behavior and day-to-day interactions with the project-affected communities. During the construction phase, contractors and their sub-contractors can have more frequent contact with local communities than do project staff, and affected communities often do not make a distinction between contractors and the MInT – both are viewed as part of the "project." Contractor actions can therefore pose a risk for stakeholder engagement that should be managed from the outset. This involves

selecting contractors that have the capability to deal effectively with stakeholders and putting such requirements into their contract. Contractual requirements might include having their own mechanism for managing grievances, their own manager of community relations (community liaison officers), and providing training for their staff and sub-contractors on how to interact with the project-affected communities. The environmental and social safeguard specialist of the PIU and Project Areas Focal Personnel requires to monitor contractor actions on the ground and to assist in resolving any complaints from project stakeholders about contractors.

7.3 Proposed Management Tools

- 119. As the more likely it is that the concerns of the project-affected communities might pose a risk or reputational issue for the project, emphasis requires to the management of the project relationships with the local communities. To this end, below are some good practice principles for managing stakeholder engagement processes as per the World Bank Group's Good Practice Handbook for Stakeholder Engagement (2007).
- 120. **Coordinate activities and assign overall responsibility:** Over the life of the project, affected communities and other interested parties will likely interact with a variety of representatives from within the project implementing agency (MInT) and Project Contractors (PCs). Thus, it is essential that this diverse set of engagement activities be coordinated. Consistency of information conveyed to stakeholders by different teams or business units within MInT and PCs is important, as is keeping track of such activities in order to reduce inefficiencies, confusion, and conflicting messages or commitments. This is usually best achieved by giving a senior manager overall responsibility for stakeholder engagement. This high-level oversight not only helps to underscore the importance of the function, but is needed in order to effectively implement the strategy and coordinate the various activities across the project components/activities.
- 121. Create clear reporting lines between the community liaison function and senior management: In order to be effective, project area focal personnel for MInT and community liaison officers for PCs need to have the authority to negotiate on behalf of their respective organization. This requires a clear reporting structure and clarification as to which decisions they can take unilaterally, and which are to be passed on to higher levels within their respective organization. Direct reporting lines also enable the senior managers of the respective organization to more effectively control risks by being kept informed of this type of field-level information in a timely manner. The more likely it is that the concerns of local stakeholders might pose a risk or reputational issue for the project, the more important it is for project area focal personnel and community liaison officers to have a direct channel to senior managers.
- 122. **Develop and maintain a stakeholder database:** A current and regularly updated stakeholder engagement database can be a useful management tool in SEP. Ideally, it should contain details of the various stakeholder groups (their representatives, interests and concerns); details of any consultations held (including when these took place, the topics discussed and results); any commitments made by the project implementing agency and project contractors, both those outstanding and those already delivered; and a record of specific grievances lodged and the status of their resolution. Maintaining such a database is important for continuity purposes, especially in the transitions between project phases where personnel changes are common. It can also come in handy for reporting purposes or when the project might need to demonstrate the adequacy of its consultation process.

- 123. Develop and maintain a commitments register: Doing what you say you will do is essential when it comes to building trust and establishing good working relationships with stakeholders. Timely follow-through requires keeping track of all the various commitments made to stakeholder groups (affected communities, local government, donor, NGOs, or other organizations) over the life of the project. Typically, the number of commitments made to stakeholders is highest in the early phases of the project around the scoping and environmental and social assessment processes, and relating to grievances and monitoring of impacts during construction. A "commitments register" has emerged as a good practice management tool to record and follow up on the project's many environmental and social assessment documental and social assessment documentation and action plans. It should contain timeframes for action and, importantly, assign responsibility to the appropriate individuals and managements of the project implementing agency and project contractors.
- 124. *Track changes in the quality of stakeholder relationships:* Because the quality of the project relationships with stakeholders can change over time and the frequency or intensity of engagement varies during different phases of the project, it might be useful to periodically "test the temperature" of the project's key stakeholder groups and their level of satisfaction with the project in general and the engagement process in particular. An annual or semi-annual "perception" survey, independently administered, which uses the same set of questions over time to achieve continuity, is a tool helpful for the project to manage the stakeholder engagement process. By gauging changes in satisfaction levels and identifying the underlying causes, the survey information enables staff and managers to make adjustments to the process or take actions where necessary to get communications and relationships back on track.

8 GRIEVANCE REDRESS MECHANISM

125. For projects such as EA-RDIP with substantial environmental and social impacts, grievances are a fact of life. How the project responds (or is perceived to be responding) when such grievances surface is important and can have significant implications for the overall implementation of the project. A grievance mechanism should be scaled to fit the level of risks and impacts of the project. It should flow from the project's broader process of stakeholder engagement and business integrity principles, and integrate the various elements of engagement discussed in the preceding sections.

8.1 Guiding Principles for the GRM in the SEP for EA-RDIP

- 126. In principle, grievance procedures should be in place from the beginning of the social and environmental assessment process and exist throughout construction and operations through to the end of project life. As with the broader process of stakeholder engagement, it is important that management stays informed and involved so that decisive action can be taken when needed to avoid escalation of disputes. According to the World Bank's Good Practice Handbook for Stakeholder Engagement (2007), the following guiding principles are worth considering when setting up the project GRM.
- 127. *Process is important:* For affected communities and other stakeholder groups seeking to have their complaints resolved, the perception of transparency and "fairness of process" is important. A good process can enhance outcomes and give people satisfaction that their complaints have been heard, even if the outcome is less than optimal. When designing grievance procedures, think about whether they will be readily understandable, accessible and culturally appropriate for the local population. It is important to clarify at the outset who is expected to use this procedure, and to assure people that there will be neither costs nor retribution associated with lodging a grievance. The entire process from how a complaint is received and reviewed, through to how decisions are made and what possibilities may exist for appeal should be made as transparent as possible through good communication.
- 128. Scale the mechanism to project needs: The project's GRM should be designed to fit the context and needs of the particular project component or sub-component. Project sub-components that requires no land acquisition might have simpler means of addressing complaints, such as through community meetings, community liaison personnel and suggestion boxes allowing for anonymity. However, project sub-components (such as sub-component 1.1 and sub-component 1.2) that require land acquisition are likely to generate serious grievances from the PAPs and, thus, need a more formalized process and grievance redress mechanism, and a higher level of dedicated resources for receiving, recording, tracking, and resolving complaints.
- 129. *Put it in writing and publicize it:* Project's policy or process for addressing complaints cannot be effective if nobody knows about it. Thus, the project's grievance procedures should be put into writing, publicized, and explained to relevant stakeholder groups. Simply put, people should know where to go and whom to talk to if they have a complaint, and understand what the process will be for handling it. As with all information, it should be provided in a format and language readily understandable to the project-affected communities and/or communicated orally in areas where literacy levels are low. As a general rule, the project GRM should not be overly complicated to use nor should it require legal counsel to complete.

- 130. *Bring in third parties where needed:* Sometimes, ensuring "fairness of process" for affected individuals or groups requires certain measures to level the playing field of perceived power. At a minimum, the PAPs' need to have access to information. MINT can facilitate this by providing project related information in a timely and understandable manner. In cases where significant imbalances in knowledge, power, and influence exist, MINT may wish to reach out to other partners to assist in the process. In terms of advocacy, for instance, an NGO might be brought in to assist local communities and advocate on their behalf. Where mediation is desired, academic or other local institutions may be sought out to play an "honest broker" role in mediating between the project implementing agency MINT and stakeholder groups in need.
- 131. *Make it accessible:* The project's GRM should make it easy for people to raise concerns and feel confident that these will be heard and acted upon can reap the benefits of both a good reputation and better community relations. One of the best ways to achieve this is to localize the project's GRM points of contact. Hire people with the right skills, training, and disposition for community liaison work and get them into the field as quickly as possible. Maintaining a regular presence in the local communities greatly helps to personalize the relationship with the MInT and engender trust. Talking with a familiar face who comes to the village regularly, or lives nearby, creates an informal atmosphere in which grievances can be aired and sorted out, or referred up the chain of command.
- 132. **Response time and transparency matter:** It is good practice for the project GRM to publicly commit to a certain time frame in which all recorded complaints will be responded to and to ensure this response time is enforced. This helps allay frustration by letting people know when they can expect to be contacted by the project area focal personnel and/or receive a response to their complaint. Combining this with a transparent process by which stakeholders can understand how decisions are reached inspires confidence in the project's GRM system. During critical time periods, such as construction, it is important to have an immediate response to time-sensitive complaints, such as a fence being knocked down by a contractor, for example, and livestock getting out.
- 133. *Integrating with traditional grievance resolution system:* The project-affected communities have a long established traditional mechanism of conflict resolution. In all project areas, the traditional forms of managing grievances can even be recognized and used by the government structures. Thus, it is imperative for the project to use traditional conflict resolution mechanism to manage grievance related to the project in addition to the project GRM and formal legal system.
- 134. **Don't impede access to legal remedies:** If the project is unable to resolve a complaint, it may be appropriate to enable complainants to have recourse to external experts. These may include public defenders, legal advisors, legal NGOs, or university staff. MInT or PCs required to work in collaboration with these third parties and affected communities to find successful resolution of the issues. However, this is not always possible, and situations may arise where complainants will choose to pursue further legal system. In such a case, MInT will inform the person with complaints his right to resort to the formal Court System.

8.2 Proposed Institutional Setup and GRM Procedures for the Project

135. As the stakeholder engagement process is integrated into the overall environmental and social management plans, so is the grievance mechanism for the SEP than being a separate structure. With this note in mind, the below proposed institutional setup and GRM procedures for the project brings the essences of the above stated guiding principles into one.

8.2.1 Project level grievance management committee. This would constitute 1. Supervision consultant (SC) Resident Engineer - Chairing, SC Environmental Specialist, SC Social Specialist; and a PIU Social Specialist. This committee is expected to be the first line of defense for any complains, and further issues to be escalated to the project site committees and others,.

8.2.2 Project Site Grievance Management Committee (PSGMC)

136. To make the project GRM accessible to the project-affected communities, the Project Site Grievance Management Committee (PSGMC) serve as the grassroots level of entry point. The members of PSGMC include clan leaders, community elders, religious leaders, and representatives of women, youth and other DVGs with up to 6-8 members. The PSGMC will handle grievance in a culturally appropriate manner and provide opportunities to utilize the customary conflict resolution system before referring to the next level of appeal. Customary system of grievance resolution will depend on the nature of grievance and if is related to HUCs. Also, this venue will help to resolve issues and complaints of affected person at the earliest point to make the project GRM process faster and cost-effective.

8.2.3 Kebele Grievance Management Committee (KGMC)

137. In case agreement is not reached through the mediation of the PSGMC, the person with the complaints presented his/her case to the Kebele Grievance Management Committee (KGMC). The members of the KRMC shall include the Kebele administration or council member, the project area focal person, representatives of project-affected communities (clan leader and elected community elder), and representatives of DVGs and HUCs with upto 8-10 members. Like the PSGMC, the process of resolving grievance through KGMC will look all the possible opportunities to solve grievance based on the customary system. Still this venue will help to resolve issues and complaints of affected person at the earliest point to make the process faster and cost-effective.

8.2.4 Woreda/City Grievance Management Committee

138. If the complaint not resolved by KGMC, the project affected person shall be advised to present his/her complaints to the next level of Appeal Hearing Body, that is, the Woreda/City Grievance Management Committee (W/CGMC). The members of the W/CGMC shall be composed of the Woreda/City Administration, representatives of the Woreda/City Council, EA-RDI project area focal person, Woreda/City Women and Social Affairs Office Head and social expertise related to DVGs. The W/CGMC shall review the decision by the KGMC and try to resolve the complaints presented.

8.2.5 Regional Grievance Management Committee (RGMC)

139. In events where aggrieved party not satisfied with the resolution made by the W/CGMC, he or she shall be referred to the next level, that is, Regional Grievance Management Committee (RGMC) for reconsideration of the resolution by the W/CGMC. The members of the RGMC shall be composed of the regional administrator (the president or vice), representative of the Regional Council, Social Safeguards Specialist in PIU, Regional Women and Social Affairs Bureau Head and Social expertise working for DVGs and HUCs with up to 5 members. The RGMC will be committed and seriously review the decision by the W/CGMC to resolve the received complaints and, thus, make all the possible efforts to satisfy the grieved party. But, in an event of dissatisfaction, the party with complains can have the right to resort to the court system.

8.2.6 Formal Court option

140. The project-specific GRM will not prevent the rights of the project-affected party with complaints. In events where the grievance is not resolved by the RGMC at the Regional/City Administration level, then

the affected party shall be advised to take the cases to the regular court system. This would also assist in creating an alternative space for project-affected parties who would otherwise not be able to voice out their concerns through the project GRM structure for fear of reprisals despite repeated assurances of protection.

141. Also, the project GRM is complementary to other existing formal grievance redress mechanisms within the legal and administrative structures including Police, Anti-Corruption Office, and Human Rights Commission. Project affected parties shall also be informed about the existing legal and formal mechanisms and be allowed to make use of them wherever they find it necessary.

8.2.7 Special consideration for DVGs in the project GRM

142. As describe above, the institutional setup of the project GRM considers the voice of the disadvantaged and vulnerable groups (DVGs) and Historically Underserved Communities (HUCs) by including their representative in the PSGMC and KGMC.

8.3 GRM Steps and Timeframe

- 143. As shown above, the project grievance process will be simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. To achieve this, the project GRM involves the following steps and timeframe alongside each step.
- 144. *Step 1:* Receiving complaints at PSGMC meeting place. The means of receiving complaints provides multiple options for submission of grievances by project-affected persons in order to minimize barriers that may prevent others from forwarding their issues. These channels include the following:
 - (a) *In person*: This may be verbal or written submissions done at any time through face to face interactions with members of the PSGMC.
 - (b) *Grievance box*: Grievance boxes placed in strategic places of project implementation sites or communities where project affected parties would drop in their grievances at any time.
 - (c) *Phone Call or SMS:* The project-affected parties with complaints can make a call and text SMS to any of the members of the PSGMC for presenting his/her complaints orally and to arrange the meeting with the committee for submission in written.
 - (d) The members of the PSGMC will meet within one day after the complaint is being received to resolve the case and let the person with the complaints know the decision within 24 hours.
 - (e) If agreement not reached, the PSGMC will submit the case to KGMC in the same day.
- 145. *Step 2:* The KGMC will meet within 24 hours after receiving unresolved cases of complaints from the PSGMC for decision. The KGMC will let the PSGMC know the decision within the same day which in turn let know the person with complaints within one day.
- 146. *Step 3:* W/CGMC will sit for meeting to investigate the complaints received from the KGMC with a week time and decision will be made accordingly.
- 147. *Step 4:* As members of the RGMC will meet every three weeks to investigate and make decision on the unresolved complaints received from the W/CGMC. As the RGMC mostly likely receive complex issues, the process of decision making will yet take another one week time as appropriate.

148. *Step 5:* In due process from step 1 to step 4, the person with complaints will receive the decision made by the highest level of the GRM appealing system within one month time. If still not satisfied with the decision made by the RGMC, the person will be informed the right to appeal through the formal court system and he or she can be decision accordingly.

8.4 Grievance Log

- 149. A written record whether it is simply keeping a log book (in the case of minor complaints) or maintaining a more sophisticated database (for project sub-components with more serious E&S impacts) of all complaints will be maintained for effective grievance management. The record would contain
 - 1. Name of the grievant;
 - 2. Location Region, Woreda, Kebele, chainage (for liner sections of the project);
 - 3. Contact details;
 - 4. Grievance receipt method;
 - 5. Person who received the grievance;
 - 6. Date of complaint;
 - 7. Complaint Narrative and categorization;
 - 8. Classification of the complaint Concern/Grievance/ Request for information;
 - 9. Allocated staff and department/committee to resolve the complaint;
 - 10. Date of Resolution;
 - 12. Detail of investigation and resolution;
 - 11. Time taken to Resolve the complaint;
 - 12. Grievant response to the resolution.

However, overly personal data (such as copy of ID, house number and the like) would therefore be optional and kept confidential unless required to disclose to authorities. In addition to informing the complainant of the outcome (in writing where appropriate), practice as broader community engagement process, the PIU will report back periodically to communities and other stakeholder groups as to how the project has been responding to the grievances it has received.

8.5 Special Consideration to Address Issues Related to GBV

- 150. For the GRM to effectively address the issues/incidents related to sexual exploitation and other forms of gender-based violence, the project in general, and the Woreda level GRC, must create a proactive mechanism that is functional throughout the project cycle. The PIU Gender/GBV specialist will be the focal point for the project at the PIU / national level in addressing GBV related issues. The Specialist will work closely with different stakeholders to have a SEA-SH GRM system in place. At local level, the Woreda Women and Children Affairs Office head will be the focal person on issues related with sexual exploitation and other forms of gender-based violence. The following are the working procedures of the Woreda Women and Children Affairs Office to handle GBV in the project area.
 - (a) The respective Woreda Women and Children Affairs Office should receive capacity building/training on key principles of GBV/SEA case management including confidentiality, non-judgmental, best interest of the survivor, services and referrals.
 - (b) Establish a proper channel to receive reports or project-related risks of GBV, i.e., the risk factors that exacerbate or expose people to GBV.
 - (c) Conduct awareness raising campaign regarding the risks of GBV to both men and women in the project area; and key principles of GBV/SEA case management including confidentiality, non-judgmental, best interest of the survivor, services and referrals.

- (d) The respective Woreda Women and Children Affairs Office representative in the Woreda GRC will be the focal point who can confidentially receive complaints or reports from the survivors through various forms of uptake channels including telephone call (hot line if any), text message, email, face-to-face, and others.
- (e) The Woreda Women and Children Affairs will immediately (within 24 hours) communicate the complain to MInT which will report the case to the World Bank (within 48 hours).
- (f) The Woreda Women and Children Office will not investigate the GBV case. Rather, maintaining the key principles of GBV case management including confidentiality, non-judgmental, best interest of the survivor will report the case to MInT, facilitate survivors to services and referrals.
- (g) The GBV case will be investigated, and further information will be collected by GBV specialists based on the scope of risk involved.
- (h) Record all the reported incidents based on the level of risks and follow-up or track the response process of the referred agency or court until the achievement of satisfactory resolution.
- (i) GBV channel in GRM, including training of staff on handling GBV complaints disclosures and process will be established within three months of the project effectiveness.
- (j) Code of Conduct for GBV will be prepared and included in the contracts of the project, and it will be part of the awareness raising and sensitization activities.
- (k) Consent for data collection and reporting (including the immediate notifications) will be obtained and if anonymity can be guaranteed it should be provided.
- (I) Further details can be referred from the project GBV action plan and Code of contact.

9 MONITORING AND REPORTING 9.1 Participatory Monitoring

- 151. One way to help satisfy stakeholder concerns and promote transparency is to involve project-affected stakeholders in monitoring the implementation of mitigation measures or other environmental and social programs. Such participation, and the flow of information generated through this process, can also encourage local stakeholders to take a greater degree of responsibility for their environment and welfare in relation to the project, and to feel empowered that they can do something practical to address issues that affect their lives. Participatory monitoring also tends to strengthen relationships between the project and its stakeholders.
- 152. Participatory monitoring goes beyond the MInT consulting with affected stakeholders on environmental monitoring data. Besides, methods for participatory monitoring may include but not limited to:
 - (a) Empower local stakeholders: If local capacity is lacking, MINT may wish to consider capacitybuilding and training programs to enable project-affected people or local organizations to acquire the technical skills necessary to participate in effective monitoring.
 - (b) **Observation:** Observations by affected parties, triangulated to strengthen validation.
 - (c) *Group discussion:* Group discussions on the success of mitigation or benefit measures and/or on how to manage new issues that have arisen.

- (d) **Participatory techniques:** The adaptation of conventional participatory techniques to the purpose of assessing changes in the physical and socio-economic environment over time, such as a seasonal calendar, daily/weekly schedules, resource and land-use maps, and wealth ranking.
- (e) **Scientific sampling:** Involvement of affected stakeholders in scientific sampling methods and analysis many local groups are quite able to understand such techniques without professional training whereas others may need some capacity building.
- (f) **Independent monitoring panel:** For particularly complex or controversial project subcomponents, where objectivity and transparency are key, it can be good practice to establish an independent monitoring panel or group to oversee and report on the project's environmental and social performance. Critical to the success of such a panel is a composition that is trusted and technically capable, and whose monitoring reports are disclosed publicly.

9.2 Reporting to Stakeholders

- 153. Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored. In addition to reporting back to project-affected groups and other stakeholders as part of the consultation process, there are other types of reporting back to stakeholders proposed in this SEP including:
 - i. Regularly update project's commitments register and disclose progress to project-affected and other interested parties. In particular, publicize any material changes to commitments or implementation actions that vary from publicly disclosed documents.
 - ii. Make monitoring results publicly available, especially reports of any external monitors.
 - iii. Regularly report on the process of stakeholder engagement as a whole, both to those stakeholders who are directly engaged, and to other interested parties.
 - iv. Translate information reported to stakeholders into local languages and easily understandable formats.
 - v. Stakeholder responsiveness—providing information that responds to actual stakeholder expectations and interests, rather than only what the MInT would like its stakeholders to know or "thinks" they want to know.
 - vi. Materiality—focusing in detail on the project's key economic, social, and environmental risks, activities and impacts, and how they are being managed, rather than reporting many activities superficially.
 - vii. Completeness— providing sufficient coverage of E&S risks and impacts to enable stakeholders to draw their own conclusions about the project's performance

Central point of contact: Project Coordinator (Ato Tessema Geda), 0911229367, tessedf@mint.gov.et

Ν	Name	MDAs	Position	Cellphone No.	email
0					
Fed	eral Level			•	
1	Yodahe Zemichael	National ID Program Office	Executive		<u>yodahe@id.et</u>
2	Betelihem Mergia	National ID Program Office	M&E Director	0913555557	<u>betlhem@id.et</u>
3	Rahel Abraham	National ID Program Office	Program Director	0951109771	rahel@id.et
4	Sileshi Tadesse	MoWSA- Women Rights Protection	Executive	0911882233	<u>Seleshi_tadesse@y</u> ahoo.com
5	Tefera Fekadu	Development Bank of Ethiopia-DBE	Acting for External Fund, credit and Grant Finance	0912048040	
6	Gizaw	Development Bank of Ethiopia-DBE	Senior Electrical Energy Expert	0913338193	<u>Giz2005@gmail.co</u> <u>m</u>
7	Fetsum Haile	Development Bank of Ethiopia-DBE	Senior Social and Environment Officer	0911307406	Fetsum2009@gma il.com
8	Banchiayehu Eshetu	Development Bank of Ethiopia-DBE	Acting Manager M and E	0912600228	Maedotd4@gmail. com
9	Abiyot Bayou (Ph.D	MInT	Director General Digital Transformation Program (DTP)	0911034508	Abiyot.bayou@min t.et.gov
10	Abate Getenet	F/EPA	Head for Pollution Control Dpt.	0933625098	<u>Abex-</u> get@yahoo.com
11	Ato Million H/Mcheal	Ethiopian Communicatio n Authority (ECA)	Deputy Director General	0911105971	<u>milata19@gmail.co</u> <u>m</u>

Annex 1: Contact Address of Participants in the ESMF Study

12	Ato Tollosa	F/EPA	Head ESIA Department	0913754227	
13	Zelalem Assefa (Ph.D)	EthERNet (MoE)	Director General	0911791462	zelalem@ethernet. edu.et
14	Mesfin Belachew (Ph.D)	Project Coordinator for Ethiopia Digital Foundations Project (EDFP)	MInT/PIU		Mesfin.belachew @mint.edu.et
N o	Name	Office	Position	Cell No	Email
Reg	ional Level				
Afar	r				
15	Abdo Hannatu	Afar-Science, Innovation and Technology Commission	Director-ICT	0904341924	Abdi2016@gmail.c om
16	Tewoled Birhan	Afar-Science, Innovation and Technology Commission	Team Leader-ICT	0911540154	Tewoled54@gmail. com
17	Amina Musa	Afar-BoWSA	Director	0911040974	aminamussa2013 @gmail.com
18	Seadan Ahmed	Afar-BoWSA	Women Right Protection Unit Leader	0914118914	
19	Fatuma Nuru	Afar-BoWSA	Capacity Building Unit Leader	0942789716	Fafinjor2022@gma il.com
20	Abdulkadir Mohamed	ЕРА	Director	0913084083	
21	Mohamed Awol Ebrahim	Peace and Security	Director		
22	Mohamed Ahmed	Trade & Industry	Director		
Som	nali	<u> </u>			

23	W/ro Fatuma Mohamed	MInT	Head			
24	Ubha Abduirahama n	Women and Child Affair	Deputy Head			
25	Mohamed Adem Ibrahim	EPA	Deputy Head			
26	Mohamed Hassen Ahmed	MInT	Deputy Head 091166146		Maxamund52@g mail.com	
27	Abdi Yesuf Mohamed	ЕРА	Planning Director 0915210499		abdiyew@gmail.c om	
28	Mohamed Ali Ibrahim	MInT	Product and engineering service	0915061840	Moali4002@gmail .com	
29	Kaswal Abdi Ahmed	MInT	HR director	0915634049	Qabulabdi32@gm ail.com	
30	Ahmed Mohamed Abdi	MInT	Research and Award Director	0915077794	Dhorabkiliye222 @gmail.com	
31	Abdi Nasir Mohamed	BoWCA		0915051788	Abdnasir8485@g mail.com	
32	Abdulfeta Amir Abdi	EPA	Climate Change Expert	0911856504		
33	Abdulaziz Muhamed	BoWCA	Finance Head	0915304295	Gabiib999@gmail. com	
	Abdurahman Kamel	MInT	IT Director	0911596487	Abdurahmank41 @gmail.com	
Gan	nbella					
34	Yonas Abebe	Peace and Security bureau (Previous Head for Environment bureau)	Deputy Head	0965023516	yonasabebe021@g mail.com	
35	Mulugeta Melkamu	Women & Social Affairs	Bureau, Planning Director	0918063343	mulugeta0633@g mail.com	

36	Nugus H/ Mariam	MInT	Information Systems Directorate Director	ems Directorate	
37	Chunna Lero	MInT	ICT Infrastructure Supply & Maintenance Director ate Director	0935150765	<u>chunnalero@gmail</u> .com
38	Tesfaye Kassa	MInT	Technology 0935150765 Training Directorate Director		getamelkam5@gm ail.com
39	Paul Gari	MInT	Commissionaire	0944230048	pgoduru@gmail.co m
N O	Name	Office	Position	Cell No	email
Afar	Afar Woreda Level				
40	Fiyori Atnafe	Rural Land Administration	Engineer	0935376025	
41	Ahmed Abdulkadir	Trade Office	Head	0911664100	
42	Sultan Ahmed	Peace and Security Office	Head	0912551650	
43	Seada Aminu	Women and Child Office	Head	0925028187	

Annex 2: Attendance of Community Consultation Participants in Afar Region Eildar Woreda Haweli/Galafi Kebele

A. Attendance Sheet

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