

# FEDERAL MINISTRY OF WATER RESOURCES AND SANITATION

2024



## Stakeholder Engagement Plan (SEP) - Sustainable Power and Irrigation for Nigeria Project - P179684

FINAL REPORT

# LIST OF ABBREVIATIONS

C of O:	Certificate of Occupancy
CFRN:	Constitution of the Federal Republic of Nigeria
E&S:	Environmental and Social Officer
ESF:	Environmental and Social Framework
ESS:	Environmental and Social Standards
FMP:	Federal Ministry of Power
FMWRS:	Federal ministry of Water Resources and Sanitation
FPMU:	Federal Project Management Unit
FOI:	Freedom of Information
GBV:	Gender-based violence
GENCO:	(Electricity) Generating Companies
GM:	Grievance Mechanism
ICT:	Information and Communication Technology
IDP:	Internally Displaced Persons
IWRM:	Integrated Water Resources Management
LBRBDA:	Lower Benue River Basins Authority
M&E:	Monitoring and Evaluation
NGO:	Non-Governmental Organization
O&M:	Operation and Maintenance
PMI:	Project Management Institute
PSG:	Participating State Government
PSRP:	Power Sector Recovery Program
RBDA:	River Basing Development Authority
SEP:	Stakeholder Engagement Plan
SPIN:	Sustainable Power and Irrigation for Nigeria (Project)
TRIMING:	Transforming Irrigation Management in Nigeria
UBRBDA:	Upper Benue River Basis Authority
UNIDO:	United nations Industrial Development Organization
WUA:	Water Users Association

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# EXECUTIVE SUMMARY

## **ES 1: Project description and background:**

The World Bank is supporting the Federal Government of Nigeria to prepare and design the Sustainable Power and Irrigation for Nigeria (SPIN) Project. The Project Development Objective is to strengthen dam safety and improve management of water resources for hydropower and irrigation in selected areas of Nigeria. Building upon the lessons learned and achievements from the Transforming Irrigation Management in Nigeria (TRIMING) Project (P123112), the project moves to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines.

### ***Project components***

#### Component 1: Institutional strengthening and capacity building for Water Resources Management

Sub-component 1.1: Institutional Strengthening and Capacity Building for dam safety.

Sub-component 1.2: Institutional Strengthening and Capacity Building for Irrigation Management; and

Sub-component 1.3: Institutional Strengthening and Capacity Building for Hydropower.

#### Component 2: Irrigation Modernization

Sub-component 2.1: Mobilization and Development of Water User Associations (WUAs)

Sub-component 2.2: Irrigation and Drainage Infrastructure Investments

Sub-component 2.3: Irrigation Management Modernization

#### Component 3: Improvements in Dam operations and Enhancing Dam Safety

#### Component 4: Project Management

### **Justification for Preparing a Stakeholder Engagement Plan (SEP) Including Objectives**

Within the context of Environmental and Social (ESF), the SEP is an important tool for opening and maintaining transparent engagement between the Federal Ministry of Water Resources and Sanitation (FMWRS), the lead implementing ministry for the SPIN project, through Federal Project Management Unit (FPMU) and project stakeholders. The SEP is key to providing effective stakeholder engagement that can improve the environmental and social sustainability of the project, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the construction and operation of the proposed

project. The SEP outlines the ways in which implementing agencies and contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or file complaints.

The SEP covers all the SPIN Project components, and it is expedient to the effective implementation of the project as it ensures that the views of all stakeholders are represented in the implementation of the project. Through implementation of SEP, disadvantaged and vulnerable groups which include elderly people above the age of 65, female headed households (widows), persons with disabilities, people living in extreme poverty, internally displaced persons (IDPs) and orphans are all catered for through effective and inclusive consultation. This SEP will provide guidelines and procedures for stakeholders' engagement in the preparation and implementation of other safeguard documents, and during the implementation of sub-project components. More importantly, the SEP will allow participation of both affected and interested stakeholders to ensure that the project design, particularly stakeholder engagement approaches and activities, are implemented in a participatory and inclusive manner.

### ***Methodology and Stakeholders Identification and Analysis***

In preparing this SEP, both field survey and literature review approaches were applied. In addition, although the SPIN Project will be implemented in many locations across Nigeria, at this point, the dams that will be under the project have not been selected and prioritization of existing large dams are now conducted by the government. However, three dams in three states of the Federation of the have been identified for potential inclusions in the project (which as of yet is undecided however,) and served as the pilots for preparing several Environmental and Social documents, including this SEP as required by the World Bank. This SEP is a living document. It will be disclosed prior to project commencement, periodically updated and changes validated during project implementation and monitored, and its effectiveness evaluated towards the end of the project.

A detailed desk research / review was conducted on Stakeholder Engagement needs, principles and capacity, existing stakeholders' engagement and communication methods in the existing TRIMING Project whose structure regarding the SEP will be adopted for SPIN. Key informant interviews, focused group discussions and public consultations were carried out within the natural domains of stakeholders from February 8 to February 14, 2024, to hear from them to identify their needs and secure their suggestions on how these needs can be fulfilled.

## ES2: Stakeholder Engagement Regulatory Framework

Under chapter 2, an overview of the legal and regulatory frameworks existing in Nigeria which regulates citizen's freedom of information, citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions. The chapter also overviews World Bank's ESS10 on Stakeholder Engagement and Information Disclosure.

The requirements under 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:

1. Borrowers will engage with stakeholders throughout the project life cycle Borrowers will engage in meaningful consultations with all stakeholders.
2. 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.
3. The process of stakeholder engagement will involve the following: (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 to grievances; and (vi) reporting to stakeholders.
4. The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement.
5. 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.

## ES 3: Stakeholders Identification and Analysis

According to ESS10, stakeholders are individuals or groups who are affected or likely to be affected by the project and who may have an interest in the project. The term "**Project-affected parties**" includes "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. These stakeholders may include individuals or groups, including local communities" (ESF, World Bank, 2018). The term "**Other interested parties**" (OIPs) refers to "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. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups" (ESF, World Bank, 2018).

Although the participatory schemes for the SPIN Project are not yet known, the schemes representing the three potential pilot dams were assessed and potential stakeholders identified based on the categorization stipulated by the ESS 10 of affected parties and other interested parties. Preliminary engagements were conducted to elicit commitments from them to support the prospective project.

In general, Identified Stakeholders were classified into three groups namely:

1. Affected / Interested parties: Host Communities, Community members, landowners, tenants and leaseholders, landless or squatters, farmers and livelihood dependent households, reservoir fishers, Livestock owners, including herders, wage laborers and workers, small-scale business owners, mud brick makers, socially vulnerable people, Farmers associations, water users' associations, Women farmer Groups, Community Associations and Interest Groups, such as Water User Associations (WUAs), fishermen, Academics/Think Tanks, Media,
2. Other Interested Parties/Influential Parties: The Federal Ministry of Water Resources and Sanitation (FMWRS), the lead implementing ministry for the project, the Federal Ministry of Power (FMP) and Participating State Governments (PSG). As well as Traditional leaders and NGOs/CSOs, Private sector Investors, among others
3. Disadvantaged or vulnerable individuals or groups, Elderly people above the age of 65, female headed Households (widows), Persons with disabilities, People living in extreme poverty, IDPs and orphans.

Other affected persons not fitting into the above categories may still experience adverse impacts on their livelihoods, assets, or well-being due to the project. They may face disruptions in access to essential services, changes in social dynamics, or loss of community cohesion, requiring tailored support and assistance to mitigate negative consequences.

## **ES 4: Stakeholder Engagement program and Information Disclosure**

This plan is designed to ensure that stakeholders are provided with timely, relevant, understandable, and accessible information, and consultation with them is done in a culturally appropriate manner which is free of manipulation, interference, coercion, discrimination, and intimidation. The nature,

scope, and frequency of stakeholder engagement with each group of identified stakeholders will be affected by the following factors:

- How Stakeholder are identified in according to ESS 5
- Stakeholder identification and analysis.
- Explaining each group and those who are considered vulnerable.
- Cultural and religious factors that can affect participation.
- Program for engagement with the identified stakeholders, including principles, responsible parties, timeline, and feedback.

Documents disclosed shall be in English language and will be released for public review as provided for in Section 4.5 of this report. Translation of the executive summaries in relevant local languages will be made available in the designated community centers. This is to ensure that language barriers do not create a communication breach thereby nit being inclusive of all stakeholders. Other communication with stakeholders, especially in the rural communities, including local radio, leaflets, pictograms and brochures will be in English and translated in the local language obtainable and accessible in the relevant communities.

## **ES 5: Resources and Responsibilities for Implementing Stakeholder Engagement Activities**

Implementation of SEP would follow the TRIMING model. For the implementation of the activities under the SEP, it is proposed that a communications specialist be engaged to operationalize the SEP. An indicative budget for SEP per project State has been included in Chapter 5.3, amounting to a sum of 80,256,920.00 (Eighty-eight million, two hundred and fifty-six thousand, nine hundred and twenty naira) for its operation in one year.

To finance GRM, 10% of the budget for implementing the SEP (8,025,692.00) will be added to the budget. As it is not inconceivable that inflation and other unforeseeable changes may affect this costing during the implementation stage, 25% (22,070,653.00) of the total will be added to the budget as contingency provision to offset potential inflation. The final budget which is indicative and subject to review by the FPMU at the time of implementation is estimated as N110,018,864.00(One hundred and ten million, three hundred and fifty-three thousand, two hundred and sixty-five naira only.

## **ES 6: Grievance Mechanism**

As found effective within the TRIMING structure, diverse methods for reporting grievances that are culturally appropriate are to be used as they permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion / GRM boxes, Email, toll-free telephone etc). Grievance uptake and resolution shall be carried out at three levels while the law court shall be the final resort for any case not resolved within the GM structure of the project. As for grievances bordering on Sexual Harassment (SH)/Sexual Exploitation and Abuse (SEA) as well as child abuse and child labour, all complaints when received through the Project level GRM shall be escalated to the identified GBV Service Providers identified through mapping of service providers or from directory of Service Providers sourced from the States' Ministries of Women Affairs and Social Development.

## **ES 7: Monitoring of the SEP**

The SEP will be periodically revised and updated as necessary during project implementation in order to include any new identified stakeholders and to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. The final SEP will have a Monitoring and Evaluation (M&E) action plan which will guide all M&E activities related to the SEP. The two keyways in which the stakeholder engagement process, as will be provided for in the M&E action plan, will be monitored are through review of Engagement activities in the field and through reporting engagement activities.

# CHAPTER 1: INTRODUCTION AND PROJECT DESCRIPTION

## 1.1 Background

Nigeria's vulnerability to sustainable power, and climate change has increased due to a combination of political, geographic, and social factors and, specifically, the recent spike in insecurity in the country. Nigeria is highly prone to river, urban, coastal floodings, water scarcity, extreme heat, and wildfires. These climate-related risks and power outage can have severe implications on livelihoods and result in increased food insecurity, famine, population displacement, conflicts, biodiversity loss, and largely economic growth, especially in relation to production that are dependent on power.

While Nigeria is not a water-poor country, available resources per capita are declining and are unevenly distributed. Nigeria's annual surface water resources are estimated at 375 billion cubic meters (BCM). The renewable groundwater resources potential is estimated at 156 BCM/year. With a water scarcity index of 1,800 m<sup>3</sup> / capita, Nigeria is not a water-poor country for now. However, available water resources per capita continues to decline due to population growth. The resources are also extremely unevenly distributed, with mean annual precipitation ranging from 50mm in the North to 1500mm in the South. This large variability makes Nigeria extremely vulnerable to climate shocks manifesting in periods of droughts and floods.

The recent devastating flooding events (in 2012 and 2022) suggest the need for urgent action to increase resilience. In the face of climate change and variability, enhanced storage and multi-purpose dams help water managers to store and allocate water resources for productive uses. The Federal Ministry of Power (FMP) and the Federal Ministry of Water Resources (FMWR) play a key role in hydropower projects but there is sub-optimal coordination.

Irrigation development is essential to the sustainable growth of agricultural production in Nigeria. Over the past two decades, efforts to reform the irrigation sector and improve its governance system has been ongoing. Several institutions with overlapping and duplication of mandates which are controlled by the Federal Government with poor coordination. The participation of water users' associations (WUAs) has traditionally been weak from design to operation and maintenance of irrigation projects, as these have tended to be top-down.

Hydropower plays a crucial role in transforming agriculture in farming communities by providing reliable irrigation, increasing cropping intensity, improving crop yields, mitigating drought effects,

supplying energy for agricultural operations, promoting sustainable resource management, and fostering community development. Its significance cannot be overstated in driving agricultural productivity and enhancing the overall well-being of rural populations.

Nigeria has the highest electricity access deficit worldwide. Despite the unbundling and privatization efforts, the power sector in Nigeria continues to face challenges due to inadequate follow-through from both the private and public sectors. These challenges include insufficient investments, technical and commercial losses, and stagnant tariffs. Power outages, particularly those caused by low megawatt capacity, can have significant negative impacts on both small-scale businesses and large-scale industries in Nigeria.

Without a reliable power supply, businesses are unable to operate machinery and equipment efficiently. This leads to decreased productivity as workers may have to resort to manual methods or delay production until power is restored. Many businesses, especially those in manufacturing, may have to rely on costly alternatives such as generators or diesel-powered generators to maintain operations during outages. This increases operating costs and reduces profit margins, particularly for small-scale businesses with limited financial resources.

Power outages often disrupt business operations, leading to delays in fulfilling orders and meeting deadlines. This can result in the loss of customers and revenue, particularly in industries where timely delivery is crucial. The unreliable power supply discourages investment and expansion efforts by both domestic and foreign investors. Large-scale industries may be hesitant to establish or expand operations in areas with unreliable electricity, limiting economic growth and job creation opportunities. In summary, the impact of low megawatt capacity and power outages in Nigeria is profound, affecting not only the productivity and profitability of businesses but also hindering economic development, technological advancement, and overall quality of life for the population. Addressing these issues requires significant investment in infrastructure, policy reforms, and sustainable energy solutions.

To address these issues, the Power Sector Recovery Program (PSRP, 2017) was introduced. However, the underperformance of the sector has required significant federal funding to sustain the utilities, resulting in limited investment in essential infrastructure.

## 1.2 Description of the Proposed SPIN Project

The World Bank financed Transforming Irrigation Management in Nigeria (TRIMING 2014-2024) project (\$500 million). The project has achieved four (4) key results to transform the irrigation management to address above issues. Such results are: i) enhanced government commitment to financial sustainability and institutional reforms; ii) institutionalized accountability of irrigation agencies to farmers, including commitments from agencies to provide satisfactory services; iii) strengthened participation of water users through empowered WUAs; and iv) increased farmers' willingness and ability to pay operation and maintenance (O&M) fees.

The World Bank is supporting the Federal Government of Nigeria to implement the Sustainable Power and Irrigation for Nigeria (SPIN) Project. The project aims to address critical issues related to water resources management, food security, and energy security in Nigeria by mobilizing water for productive purposes, optimizing the use of existing storage facilities, and enhancing hydropower planning.

Building upon the lessons learned and achievements from the Transforming Irrigation Management in Nigeria (TRIMING) Project (P123112), the project moves to promoting a more holistic water and storage management by the inclusion of hydropower sector and supporting institutional strengthening, such as on dam safety regulations and guidelines. The project components and related interventions would be chosen through economic, technical, and geographical criteria, to act synergistically and promote an integrated water and storage management. It would also strengthen institutional coordination on storage and water management between the related ministries and departments.

The SPIN project intervention will target selected dams in Nigeria with Irrigation and hydropower potential. The Project Development Objective is to strengthen dam safety and improve management of water resources for hydropower and irrigation in selected areas of Nigeria.

### **Scope of the SPIN Project**

The project is designed to be implemented in many states and multiple locations across Nigeria. Efforts are still ongoing about the determination of specific sub-projects to be carried out and the states that will be qualified for participation. At this point, the dams and other sub-project sites that will be under the project have not been selected, and prioritization of existing large dams are being conducted by the government. However, three representative dams in which preliminary studies for the preparation of the SPIN Project were conducted were used for this study as well. These sites have been used as

pilot for the conduct of this SEP in anticipation of the determination of the participating states of the project. Interventions of the project will be limited to rehabilitation of already existing irrigation fields with a focus on rehabilitation of canals, repairs of broken walls, desilting of blocked field channel for proper water management, and other such activities. Therefore, it is anticipated that the stakeholder profiles of the emerging project sites will be akin to what is found at these three sites.

The primary beneficiaries of the project are the communities that live in dam areas and the communities that depend on water, irrigation, and electricity services provided by the dams, which could be compromised by poor dam performance or failure. In addition to saving lives, improved dam safety will avoid potential flood damage to houses, farm areas, infrastructure (roads, bridges, other public and private infrastructure) and industrial and commercial facilities available downstream of dams. Improved dam safety will also reduce the likelihood of service interruptions due to dam failure and potentially improve dam service provision, overall efficiency and storage capacity, including during drought periods.

This stakeholder engagement plan (SEP) is not conclusive on all the project sites or participating states. Further engagement, based on the template established by this SEP will be conducted as emerging activities and project intervention sites are being determined.

### **1.2.1 Project Components**

The components of the project, as outlined below, reflect a comprehensive approach towards promoting sustainable development, efficient water resource utilization, and integrated water resources management practices:

- A. **Institutional Strengthening and Capacity Building for Irrigation, Hydropower, and Storage Management:** The objective of this component is to strengthen irrigation, hydropower and storage management and to improve the operation and maintenance of storage infrastructure, irrigation perimeters, and flood management systems at the national and local levels. This will be conducted through two areas of intervention: i) development and adoption of monitoring systems and decision-making institutional framework and tools; ii) institutional and human resources capacity reinforcement. The inclusion of a PBC is considered for this component to promote institutional changes on dam safety (this will be discussed in more detail during preparation).
- B. **Irrigation and Agricultural Services Modernization:** This component will support the rehabilitation and revitalization of about 30,000 hectares of irrigated command area. The availability of appropriate water resources will be ensured at all stages through detailed studies on the feasibility, which are also

ready from the existing work, such as under TRIMING. Investments under this component will be selected from the list of national irrigation schemes provided by the government using technical and economic selection criteria, which ensure the IWRM support approach of having irrigation, hydropower, and dam safety components in the same geographical locations.

- C. **Rehabilitation and Improvement of Hydropower and Storage Services:** The proposed component focuses on two key sub-components: (1) enhancing dam and storage safety, and (2) improving hydropower through studies, improvement measures, investments, and technical assistance. By integrating these elements, Component 3 aims to improve the overall performance and sustainability of hydropower and storage infrastructure, promote responsible investment, and build the technical capacity of stakeholders involved in the sector.
- D. **Project Management:** The objective of this component is to effectively implement, monitor, and evaluate project activities. It involves establishing the Federal Project Management Unit (FPMU) to oversee and coordinate project implementation, as well as setting up a monitoring and evaluation (M&E) system. An external M&E agency will be contracted to assess project activities and their impact. The component includes financing for consultancies, training, materials, office equipment, and operating costs. It also provides investment and technical support for a robust management information system (MIS) and ICT system. The Component will also support and strengthen the capacity of the government counterparts on the application of Environmental and Social Framework (ESF) and Citizen Engagement activities. These measures ensure efficient project management, monitoring, and citizen participation, contributing to the successful achievement of project outcomes.

### **1.3 Rationale and Objectives of the Stakeholder Engagement Plan**

The preparation and implementation of SEP is a requirement under the ESF/ESSs. It covers the entire range of the SPIN project components. The SPIN Project is a high-risk project that may impact the lives and livelihoods of some of the stakeholders temporarily or permanently. To avoid or mitigate some of the social and environmental risks involved in the implementation of the project this SEP has been prepared.

Within the context of ESF, SEP is an important tool for opening and maintaining transparent engagement between the Federal Ministry of Water Resources and Sanitation (FMWRS), the lead implementing ministry for the SPIN project and the Federal Ministry of Power, through Federal Project Management Unit (FPMU) and all project stakeholders. The SEP is expedient to the effective implementation of the project as it ensures that the views of all stakeholders are represented in the



implementation of the project. More importantly, the SEP allows participation of both affected and interested stakeholders to ensure that the project design, particularly stakeholder engagement approaches and activities, are implemented in a participatory and inclusive manner. Through implementation of SEP, inclusion of the ethnic minorities, vulnerable groups, and underserved peoples in the process of consultation will be ensured. This will provide stakeholders the opportunity to be aware of project activities, their potential impacts, safeguards principles and participatory approaches. This process will be sustained throughout the project implementation.

Effective stakeholder engagement will improve the environmental and social sustainability of projects, enhance project acceptance among the people and community hosting such project, contribute significantly to overall successful project design and implementation.

The following are the activities involved in the Stakeholder Engagement Plan (SEP):

1. Stakeholder Identification and Analysis
2. Information Disclosure
3. Stakeholder Consultation
4. Grievance Management
5. Reporting to Stakeholders; and
6. Documentation of all stakeholders' plans on how the engagement with stakeholder will take place.

As a result, the SEP is helpful in providing guidance and procedures to all participating states and subprojects. Site specific SEPs will be prepared for each subproject under the SPIN Project.

# CHAPTER 2: STAKEHOLDER ENGAGEMENT REGULATORY FRAMEWORK

## 2.1 Introduction

This chapter contains an overview of the legal and regulatory frameworks existing in Nigeria which regulates citizen's freedom of information, citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions. The chapter also overviews World Bank's ESS10 on Stakeholder **Engagement and Information Disclosure**.

## 2.2 National Legal Provisions for Citizen Engagement

### 2.2.1 Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended):

Policies: In Chapter Two provides for Fundamental Objectives and Directive Principles of State Policies; these are the obligations accruing to the State with respect to its citizens. Section 16 provides that the State shall harness resources and control the National economy in such a manner as to secure the maximum welfare, freedom, and happiness of every citizen on the basis of social justice and equality of status and opportunity. It goes further in Section 20 to provide that the State shall protect and improve the environment and safeguard the water, air and land, forest and wildlife of Nigeria. In Chapter IV, Section 39 to safeguard the freedom of every person in Nigeria to hold opinions and to receive and impart ideas and information without interference.

### 2.2.2 The Freedom of Information (FOI) Act:

This Act derives its powers from Section 39 of the Constitution of the Federal Republic of Nigeria. This Act applies not only to public institutions but also to private organizations providing public services, performing public functions, or utilizing public funds. The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. Section 1 of the Act provides that every citizen whether adult or minor is entitled to have access to any records under the control of the government or any public

institution. Section 1(3) of the Act allows an applicant who has been refused information by a public institution to institute proceedings in Court (Federal or State High Court) to compel the public institution to release the information sought. 1 Freedom of Information Act, 2011, Laws of the Federation of Nigeria. Electronically available at Freedom of Information Act (cbn.gov.ng) 2 Section 1 and Section 2 (1) Page 8

Obligations which the Act imposes on Institutions include:

1. A description of the organization and responsibilities of the institution including details of the programs and functions of each division, branch and department of the institution.
2. A list of all classes of records under the control of the institution in sufficient detail to facilitate the exercise of the right to information under this Act, and manuals used by employees of the institution in administering or carrying out any of the programs or activities of the institution.
3. Description of documents containing final opinions including concurring and dissenting opinions as well as orders made in the adjudication of cases.
4. A list of – files containing applications for any contract, permit, grants, licenses or agreements; reports, documents, studies, or publications prepared by independent contractors for the institution, and materials containing information relating to any grant or contract made by or between the institution and another public institution or private organization.
5. The title and address of the appropriate officer of the institution to whom an application for information under this Act shall be sent, provided that the failure of any public institution to publish any information under this subsection shall not prejudicially affect the public's right of access to information in the custody of such public institution.

All public institutions shall make available any of the records as listed above and as requested by the stakeholders within a period of 7 days of the request.<sup>3</sup>

### 2.2.3 Environmental Impact Assessment Act:

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, Large Agricultural Projects etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project. For public access to information, Section 57 of the Act requires Agencies to maintain a public registry in respect of a project. The registry shall contain all

records and information produces, collected, or submitted with respect to the environmental assessment of the project, including any report relating to the assessment and any comments filed by the public in relation to the assessment. The Act also makes it compulsory for project proponents to disclose EIA reports through the Federal Ministry of Environment to all stakeholders for their easy accessibility and inputs. This is usually carried out through advertisement in local dailies for 21 working days and through display of such documents at various designated Centers close to the project area such as the Local Government Headquarters and Community Town Halls.

#### **2.2.4 Urban and Regional Planning Act, Cap N138, 2004:**

This Act provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

### **2.3 World Bank Environmental and Social Standard on Stakeholder Engagement**

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:

1. Borrowers will engage with stakeholders throughout the project life 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.
2. Borrowers will engage in meaningful consultations with all stakeholders.
3. 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.
4. 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 to grievances; and (vi) reporting to stakeholders.

5. 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 taken into account, or the reasons why it was not.

6. 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 has to disclose the updated SEP.

# CHAPTER 3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

The first step in the stakeholder engagement process is to identify the key stakeholders to be consulted and involved. Stakeholders are individuals or groups who are affected or likely to be affected by the project and who may have an interest in the project. The term “Project-affected parties” includes “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. These stakeholders may include individuals or groups, including local communities” (ESF, World Bank, 2018). The term “Other interested parties” (OIPs) refers to “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. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups” (ESF, World Bank, 2018). Vulnerable groups are a group of individuals who can be affected by the project.

## 3.1. Method of Identifications

For the preparation of the SEP a detailed desk research / review was conducted on Stakeholder Engagement needs, existing capacity, available stakeholders’ engagement and communication methods undertaken for the TRIMING Project, whose structure regarding the SEP will be adopted for SPIN, as well as other projects that had been implemented in the same sectors covered under SPIN, namely irrigation farming, storage and hydropower.

The desk research helped to identify possible stakeholders across the sectors and locations targeted by the project, including irrigation, storage, and electricity. This was subsequently drilled down on the three already identified project pilot sites where citizens and communities were engaged and in discussion about the prospective project. The identification process was therefore localized to each of the pilot project site.

Using the above methods stakeholders were identified across the three schemes identified for the pilot phase based on the categorization stipulated by the ESS 10. They include affected parties and other interested parties as well as vulnerable groups. The preliminary engagements were also done to explore the level of commitment and support of the stakeholders to the prospective projects.

Stakeholder Identification for SPIN through the desk review and some engagement with the pilot communities allowed the team to assess various segments of the identified entities – persons and groups, in relation to project components. It determined the way in which different groups seek information and helped find common grounds in engaging them. The engagement with the stakeholders identified during the desk review led to interviews and focus group discussions on the proposed projects. The identified stakeholders included different sectors involved in the project such as government institutions, non-governmental organizations as well as community and private sector entities.

## **3.2. Categories of the stakeholder groups in the project area.**

1. Affected Parties
2. Disadvantaged / Vulnerable Individuals or Groups
3. Other Interested Parties

### **3.2.1 Affected Parties:**

They are Stakeholders who are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project. They include the following groups:

Host Communities where projects are located and water users

1. Community members in the project host communities
2. Crop farmers.
3. Landowners.
4. Tenants and Leaseholders
5. Landless or Squatters
6. Livestock farmers
7. Cattle herders
8. Reservoir fishers
9. Farmers associations
10. Women Farmer Groups
11. Water Users association
12. Wage Laborers and Workers
13. Small-Scale Business Owners
14. Community Associations and Interest Groups
15. Internally Displaced People (IDPs)

### 3.2.2 Disadvantaged/Vulnerable Individuals or Groups:

This category of Stakeholders are people who may by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, age and health reasons be more adversely affected by the project activities than others. There is an overlap between this group and affected groups.

In the project areas these groups are present. Disadvantaged and vulnerable individuals could be among the affected parties. The group requires particular attention to participate in the project benefits and to fully understand how project impacts may disproportionately affect them. Particular attention being paid to this group will also ensure that communication systems to enhance stakeholder engagement will be adapted to take into consideration such groups or individuals' particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures.

### 3.2.3: Other Interested Parties:

This category of stakeholders is made up of Stakeholders who may not be directly or indirectly impacted by the project, but who have the potential interest to influence the project outcomes via their statutory functions and mandates or other factors. They include Ministries, Departments and Agencies with statutory roles in the implementation of SPIN project in the various participating states. They could include:

Federal Ministry of Water Resources and Sanitation

Federal Ministry of Power (FMP)

Water Boards

State Governors

Ministry of Finance.

Ministry of Environment

Ministry of Agriculture

Dam operators,

Ministry of Local Government Affairs

Private Sector Investors

Traditional Leaders

Faith- based / religious leaders.



River Basins Authorities  
State and Federal level Emergency Management Agencies  
Local Government Councils  
Transmission Company of Nigeria  
Ministries of Agriculture (State and Federal)  
Ministries of Environment (State and Federal)  
Civil Society Organizations  
GBV Service providers

### **3.3. Stakeholder Analysis**

The table below is a representation of stakeholder analysis showing the identified Stakeholders, and their level of interest and influence on the project. Influence in this SEP is defined by the stakeholder's decision-making powers, in the sense of the stakeholder's ability to make decisions that determine the project outcomes and process of implementation of the project.

In determining strategy for engagement of stakeholders who have interest in the project and who may be able to influence project outcomes, the following classifications are used, also showing how these stakeholders are equally engaged throughout the project planning and implementation according to their level of interest:

#### **High**

High Influence stakeholders will be kept informed, engaged and consulted throughout the duration of the project. This will be done by:

1. involving those most influential stakeholder (s) in SPIN governance decision making bodies through committees (including the steering committee) and,
2. Engaging them and consulting them as needed through the technique and platform provided in Table 4.2 of this SEP (Stakeholder Engagement Plan)

#### **Medium**

Considering that this group is lower on the decision-making scale than the High Influence Stakeholders, adequate care should be taken to ensure that they are given a voice, and their opinions are included in project development and implementation.

Medium Influence Stakeholders will be kept informed and monitored throughout the duration of the project. The plan is to ensure that this class of stakeholders are adequately engaged through consultations and feedback channels to ensure that they are kept informed and if necessary, involved in the project development and implementation.

## Low

This group is lower on the decision-making scale in comparison to the High and Medium Influence Stakeholders. Their influence in decision making may be low, however these stakeholders have high interest in the project outcome. Stakeholders in this category are at the grassroots level; including host community members, vulnerable persons, and community associations who without focused assistance, may not be able to participate in the decision-making process of the project. The plan is to fully engage this group and apply all effort to ensure that they are satisfied and fully informed of the project at all times. This will be done by:

1. Focusing efforts on these groups of stakeholders throughout the project cycle.
2. Involving this groups of stakeholders in regular consultations throughout the project cycle.
3. Ensuring adequate use of the grievance redress and feedback channels to engage and keep this group satisfied; and
4. keeping them in the loop on decisions that will influence design and implementation.

*Table 1: Showing Stakeholder Analysis*

No	Stakeholders	Influence	Nature of relationship with Project	Interest
1	Office of the State Governor	High	Influencer	High
2	Ministry of Finance	High	Implementer	High
3	Ministry of Water Resources and Sanitation	High	Implementer	High
4	Ministry of Agriculture and Food Security	High	Implementer	High
5	Ministry of Environment	High	Influencer	High
6	Ministry of Local Government Affairs	High	Access Support/Implementer	High
7	Ministry of Women Affairs	High	Support	High
8	Ministry of Information	High	Awareness creation support	High
9	Traditional Leaders/Faith Based Leaders	Low	Community Engagement, Transparency, Accountability.	High
10	Community Based NGOs	Medium	Community Engagement, Transparency, Accountability.	High

No	Stakeholders	Influence	Nature of relationship with Project	Interest
11	Community members in the project host communities Anyone Crop farmers. Landowners Tenants and Leaseholders Landless or Squatters Livestock farmers Cattle herders Reservoir fishers Farmers associations Women Farmer Groups Water Users association Wage Laborers and Workers Brickmakers Small-Scale Business Owners Community Associations and Interest Groups	Low	Directly Impacted	High
12	Vulnerable / Disadvantaged Groups	Low	Directly Impacted	High
13	Ministry of Education/Nigerian University Commission	Low	Support	High
14	Ministry of Works	High	Support	High
15	Dam operators	low	Directly affected	High
16	Farmers associations and traders	Medium	Directly affected	High
17	Fishers and Fishers Associations and traders	Medium	Directly affected	High
18	Herders	Low	Directly Impacted	High
20	State water Board	Low	Support	High
21	Private sector investors	High	Future investors in the hydropower component	High

### 3.4. Affected People in Each of the Potential dams

As previously highlighted, the Doma, Wura Keso, and Naka dams have been specifically selected for thorough environmental and social assessments even when it remains to be determined whether these dam will be included under the project. As part of this process, the SEP has also conducted a comprehensive assessment of the potential individuals and communities who could be impacted should the SPIN Project choose to invest in the rehabilitation of the dams and irrigation systems in these areas.

### 3.4.1 Doma Dam

The dam is in the outskirts of the township of Doma in Nasarawa state, in the Lower Benue River Basin Development Authority LBRBDA, which commands 2000 hectares, all of which has already been acquired by the LBRBDA and land occupiers have been compensated at the time of acquisition. There are ten wards in the community surrounding the dam. Most farmers working in the 2000 hectares of the command area are from the community. Outside this command area is a larger expanse, yet to be surveyed and could be available for irrigation farming in the future. There are no ownership claims on the 2000 hectares.

The dam has been the source of water supply for the use of the community. There is a renovation **exercise** in progress on the irrigation infrastructure, and there is a hydropower subproject supported by UNIDO already being carried out at the dam site.

**3.4.2.1. Doma Dam Affected Parties:** Affected parties in Doma Dam are identified by groups as well as by their functions around the Dam, based on the discussion and engagement with people living or working around the Dam area. The affected parties are represented in the table below with what qualifies them as stakeholders.

*Table 2 Doma Dam Affected Parties*

SN	Affected Parties	Component	Qualification
1	All water consumers of Doma and surrounding towns and villages	Components 1&2	The implementation of the project, which may result in civil works will affect the population of the town if the supply of water would be halted for any reason and for any period. They have high interest but low power
2	Farmers and Farmers Associations	Component 2	These will be affected by the implementation of the project because they are already occupying lands in the command area. Any development around the dam will affect them. They have high influence and high interest on the project
3	Fishers and Fishers Associations	Component 2	This group earn their living directly from the reservoir and they have their methods of coordination, which can be leveraged on to engage them. They have medium level influence and high interest
4	Owners of adjoining land to the RBDA land	Component 2	These may be affected in the movement of machinery or possible expansion of the command area of the dam during implementation. They have high interest but low influence.
5	Farmers/Fishers with disabilities	Component 2	They exist like other farmers but not defined as a separate group. They have medium interest and low influence
6	Local Herders	Component 2	There has been incidence of conflict between this group and farmers because of the activities of herders, who graze their herds on farm land. There is a need for an alternative grazing site. They have low interest but high influence
7	Nasarawa State Water Board	Component 1&2	It had been making use of the reservoir to provide water to the public in Doma. It has high interest but low influence on the project

8	Doma Dam Project manager	All components	He oversees the activities of all the farmers, fishers and is the representative of the government among them as a public servant. The project implementation will increase his responsibilities and will add to his job description. He has high interest and high influence on the project
9	Farm Manager	Component 1,2,3.	He has direct contact with all stakeholder groups both the affected parties and other parties. The project implementation will also increase his work load . He has high interest and high influence on the project
10	The whole Doma Community	All components	The community will be interested as direct and indirect beneficiary of all the components of the project. It has high interest and low influence

### 3.4.3 Doma Other Interested Parties

Other interested parties are not directly affected by the implementation of the project, but they have significant interest in the outcome or day-to-day running of the project. Doma Dam Project also has this category of stakeholders.

*Table 3:Doma other interested parties*

SN	Interested Parties	Component	Qualification
1	Andoma of Doma, the traditional ruler of Doma	All components	As the community leader of Doma whose interests encompasses the interest of the whole community in terms of water supply, irrigation, electricity, and storage infrastructure. He has high interest but low influence on the outcome of the project
2	Rural Electrification Agency	Component 1	The regulation of electricity and uptake of generated power for rural distribution. It has low influence but high interest.
3.	Federal Ministry of Water Resources and Sanitation	All components	The overall implementation of the project will determine the ministry's resource mobilization personnel deployment and increased activities. It has high interest and high influence on the project outcomes.
4	Federal Ministry of Power	Components 1,2,3	The ministry will be saddled with additional responsibility by the project. It has high influence and high interest
5	Power Distribution companies (DISCOs)	Components 1,2,3	In case hydropower is included for the Naka project, for the output of the hydropower to get into homes, the DISCOs have to be involved. They have low influence but high interest.
	Community youth	Components 1.2.3	The project implementation will provide more jobs and also create a new opportunity for young people.
	Nasarawa State Ministry of Agriculture and water resources	Components 1,2,3	Increased agricultural and water resources capacity in the state will increase activities in this ministry. It has low influence but high interest.

### 3.4.4 Suggested Engagement Method for Doma

At the level of project preparation, the community entry method of engaging with the gatekeepers or traditional community leaders of the catchment area should be the first step. This can be facilitated by the project manager. The Andoma, the community leader has the knowledge and supports the project.

An initial courtesy visit to him and his supporting chiefs has been carried out. The project team in charge of the SEP processes should have an open communication channel with him and do occasional check-ins to sustain the support of this traditional ruler.

During all stages of project implementation, the project manager is in the best position to consult first for the rallying of all stakeholders. All groups are registered with him at the Lower Benue River Basin Authority's LBRBDA office in Doma. He has perfected an internal mechanism of rallying the leadership and also members of all the group working around the dam in a short notice.

All groups and associations gather themselves together through telephone. Many of them operate through WhatsApp groups. This channel should be exploited for the passage of important information to individual groups. They can then be engaged generally through focus group discussion based on their separate interests or generally in a public forum (meeting.) Minutes of all meetings should be recorded, and all comments accurately noted.

At a point during project implementation, all this groups will need to be organized into one tight Water User Association, both for ease of communication and grievance redress. This will also allow for a mandatory monthly meeting at the behest of the Project management.

For the general public, the project will need to hoist an interactive website with portals for chat rooms and a newsletter that can be subscribed to online and in hard copy.

### 3.4.5 Naka Dam

This is a dam built across River Ana in the 1980s in Gwer Local Government Area of Benue State, with a capacity of 2 million cubic meters. It was built primarily for water supply to the town with 100 hectares of irrigation farming capacity. The irrigation infrastructure was functional for a few years. Currently, the dam is not functional due to silting. The irrigation infrastructure is also currently not functional. Farmers use direct pumping to irrigate the 100 hectares in the command. There is a desilting activity currently being carried out by the RBDA. Dry season farming used to be carried out on the 100 hectares with the RBDA undertaking to plough lands for the farmers, and sometimes supply them inputs. This assistance by RBDA stopped. The government has a certificate of occupancy (CofO) over the 100 hectares but there is a high incidence of encroachment and occasional land related conflicts. This encroachment was said to be caused by migration into Naka by dwellers of surrounding villages who have been displaced by banditry and insecurity. Some of the villages surrounding the areas like Saav and Kiavs have been abandoned, creating a refugee crisis in Naka, the biggest town in the Local Government Area. Fishing is allowed by consensus between the farmers, the fishers, and the

Lower Benue River Basins Development Authority at the dam area only between January and March of each year. This was agreed to prevent overfishing and the optimal use of the water.

### 3.4.6 Naka Dam Affected Parties

Affected parties of Naka Dam will include stakeholders in the agricultural value chains and others who are engaged in other livelihood activities and have made a home within the command areas as settlers.

*Table 4: Naka Affected Parties*

SN	Affected Parties	Component	Qualification
1	Dam Coordinating Committee	1,2,3	The RBDA, because of crisis in the Naka Dam has handed over the coordination of the command areas to the farmers, which has allowed them to self-regulate. They have high interest but low influence on the outcome of the project
2	Farmers Association	2 and 3	Whatever activity that will be carried out around the dam may disrupt farming activities even if it is temporary. This category of people will be the ultimate beneficiary of component 2, but it will also bear the brunt of the component. They have low influence but high interest.
3	Homeowners within the command areas	2	These incidental stakeholders have already erected permanent structures within the command area of the dam, which has been reducing in size for years as a result of frequent abandonment. They have low influence but high interest.
4	Shallow well operators for water supply	2	Since the dam was originally constructed mainly for water supply to the communities, these shallow well operators sell water as gap fillers because of lack of activity at the dam which has lasted a long time. Civil works may obliterate some if not all of these wells which are within the command area. They have low influence but high interest.
5	Clay brick makers	2	This category of people uses the siltation of the river as their raw materials. As a result they have created a vibrant industry and thriving individual businesses within the basin of the river. They have low influence but high interest.
6	Migrant settlers/refugees on the bank of the Reservoir	1,2,3	They have formed a new community of settlers from all adjoining villagers that have been dislodged by bandits and kidnappers.
7	Fishers	2	They currently have only two months of fishing on the river. Civil work on the dam may obliterate
8	Naka Rice Mills Ltd	1,2,3	The proximity of this rice mill to the command areas makes its infrastructure vulnerable to any eventual expansion of the dam or civil works in the area. They have low influence but high interest.
9	Gwer Local Government Authority	Components 1,2,3	The LGA council has tried to work on the dam area before now to discourage the use of the dam for waste disposal. Their concerns about this will also be looked into. They have low influence but high interest.

10	Lower Benue River Basin Authority	All components	The management of the dam has always been the responsibility of the RBDA. Income has been generated through the RBDA for the government. The management of the project will rely on the institutional memory of the personnel of the RBDA
11	Leadership of Women Group in the Naka and Gwer LGA	Components 1,2,3	There is evidence to suggest cultural marginalization of Women in the community. For them to benefit maximally in the agricultural value chain, a pro-active engagement with women will be conducted. They have low influence but high interest.
12	Naka Community leadership	Components 1,2,3	The condition of land occupancy around the Dam will need the intervention of community leadership for the project to sail smoothly. High influence and high interest
13	Naka Community	All components	The community will be interested as direct and indirect beneficiary of all the components of the project. They have low influence but high interest.

### 3.4.6. Naka Dam's Other Interested Parties

Although the water supply infrastructure in Naka is in disuse, and the 100ha command area have experienced highly reduced activities over the time, a couple of stakeholders will still maintain interest in it, especially when the project is being implemented.

*Table 5: Naka Dam's Other Interested Parties*

SN	Other Parties	Interested	Component	Qualification
1	Naka leaders	Community	All components	The chief of Naka and other community leaders are interested parties in the project in terms of water supply, irrigation, storage infrastructure and possible hydro power.
2	Benue State Water Board		Component 2	Having had the control of water supply to the community before the collapse, the Benue Water Board will display significant interest in the new project if it still caters to community water supply. They have low influence but high interest.
3.	Rural Electrification Agency		Component 1	The regulation of electricity and uptake of generated power for rural distribution. They have low influence but high interest.
4	Power generation companies (GENCO)		Component 1	There will be need for collaboration with the power generating companies operating within the project catchment area for the hydropower component. They have low influence but high interest.
5	Power Distribution companies (DISCOs)		Component 1	For the output of the hydropower to get into homes, the DISCOs have to be involved
6	Benue State Ministry of Agriculture and Natural Resources		Components 1,2,3	The state prides itself as the food basket of the Nation. SPIN Project in the areas of irrigation and storage can give a fillip to this claim. High interest and high influence
7	Benue State Ministry of Land and Survey		Component 1,2,3	The complicated land occupancy in the surrounding of the dam due to migration and new unauthorized structures will require the involvement of this ministry. High interest and high influence



8	Benue State Ministry of Environment and Water Resources	Components 1,2,3	The entire project may require the involvement of this ministry especially in terms of capacity building for sustainability. Low interest and low influence
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### 3.4.7 Proposed Engagement Methods for Naka

Naka town is located in a high-risk area at the moment. The direct route to Naka is not advised for travel without security arrangements and the routes linking Makurdi, from Naka, passing through other towns should also be used with much caution. The engagement of stakeholders for the purpose of initial fact finding for this assignment was done partially remotely. Given visiting the community entry was not physically possible due to safety concerns, community members were invited to Makurdi, the capital of Benue State at no cost to the stakeholders. These are community members that were willing to travel and had time to be part of the forum. A major entry point in the Naka community is through Kyari, the Transforming Irrigation Management in Nigeria (TRIMING) desk officer at the Lower Benue River Basin Authority. The effort of the TRIMING desk was complemented by the project manager and the LBRBDA legal director, who is an indigene of Naka.

A major obstacle in for stakeholder engagement in Naka is the constant reported security crisis around Gwer West Local Government Area, especially on major roads. This can be surmounted by the engagement of security personnel each time there is need for a large gathering in Naka.

To subsequently engage a large gathering of the affected persons, especially from the command area especially during project implementation, (including illegal occupiers or those who have already established livelihood activities around the dam there will be a need to work with the local government authorities to facilitate a meeting because there is tension in the population because of continuous influx of internally displaced people from neighboring villages. The use of the mass media, which is an effective method in Naka has proved to work well in passing information to the general public and other interested parties at the level of project preparation. Further to this, there should also be monthly town hall meetings to communicate with persons affected by the project and to obtain stakeholder buy-in. While there is security tension around Gwer West LGA, engaging key stakeholders may require moving them to Makurdi for public forums and focus group discussions.

During project implementation, the stakeholders need to be reorganized into a Water Users Association for the farmers and fishers and they must hold monthly meeting. Opinion leaders and gatekeepers will be identified during engagement. Leaders of stakeholder groups can now be engaged to pass information down. The public will always be engaged through the mass media, the project website, social media and the project newsletter throughout the project 's life.

### 3.4.8. Wuro Keso Retention Pond, Gassol

The Wuro Keso dam is a retention pond built on River Taraba around the Tella Barrage of the river in Gassol town, a settlement in Taraba State. The command area of Wuro Keso retention pond is about 38000 ha. However, only 33,000 has been prepared for farming by the Upper Benue River Basin Authority (UBRBDA). The Gassol community is predominantly a fishing community. Between 2000 and 3000 ha are allocated to farmers who grow mainly rice. There is no electricity in the community and there is no sign of hydro power installation in the barrage or anywhere around the pond. Majority of Gassol farmers are grain farmers while a large percentage engage in fishing in the community.

### 3.4.9 Gassol Affected Parties

As noted, although many of stakeholders in Gassol are fishers, a substantial number are also farming in the command area of the pond.

*Table 6: Gassol Affected Parties*

SN	Affected Parties	Components	Qualification
1	Farmers associations	Components 1,2,3	Any new development around the pond will affect those already farming in the command area of the water. The land belongs to the RBDA. They are mostly just tenant farmers as individuals. Their interest is high but their influence is low. They usually comply with directives about the dam from the RBDA. They cannot impact decision.
2.	Gassol Integrated Farms Ltd	Components 2&3	This is a private sector investor that has leased 5000 ha and developed 580 ha of RBDA land and practicing irrigation through tube wells and cultivating in the dry season Their interest in the project is high and their influence is medium based on the fact that he investment they have put in place can influence new project design.
3	Fishers Association	Components 1,2,3	They ply their trade all year round in the command areas and in the waters from River Taraba. Their interest is high but their influence is low because they do not determine anything on the project.
4.	Women Farmers Association	Components 1,2,3	They are an active group in the community and there is a large women representation among the farmers. They have high interest but low influence.
5	Water Users Association	Components 1,2,3	These are direct beneficiaries of the project who had gathered themselves into an association. Their influence is high and their interest is high
6	Herders in the community	Component 2	The pond is a source of watering for the herds and this may also generate interest when irrigation farming capacity is increased, especially with the generally noted farmer-herder conflicts in the nation. They have low influence but high interest.
6	Community leadership	Component 2,3	The community has no electricity and there is no source of potable water in the community rather than the pond and River Taraba. Improvement on the irrigation structures may change the game. They have low influence and high interest

### 3.5.2. Gassol Other Interested Parties

There are stakeholder groups in Gassol who may not be affected directly by the project but who will be interested in the activities surrounding the project.

*Table 7: Gassol Other Interested Parties*

SN	Other Interested Parties	Component	Qualification
1	Fish traders Association	Components 1,2,3	It is in the interest of this group that fishing gets better in the community. The project will work with all associations on ground during implementation. Low interest and low influence
2	Fish smokers Association	Components 1,2,3	Also, it is in the interest of this group that fishing gets better in the community. The project will work with all associations on ground during implementation. Low interest and low influence
3	Gassol Multi-purpose Society	Components 1,2,3	Many farmers and fishers belong to this group and usually achieve cohesion through the group. It is a rallying point for them. Low interest and low influence
4	Tractor Operators Association	Components 2,3	The progress of implementation of the project impacts on the activities of this group that rely on the readiness of farmers to plough the land for their own functions. They are a cartel of sort that needs to be organized. High interest and high influence
5	Taraba State ministry of Agriculture and Food security	Components 1,2,3	This ministry will benefit from all capacity improvement that the project will offer and the development of value chain. High interest and low influence

### 3.4.10 Proposed Engagement Methods in Gassol

Gassol is a largely agrarian community with fishing as the major source of their livelihood. At the preparation stage of the project, community entry can be done by meeting with the traditional community leaders. This can be followed by public forums like town hall meetings, as well as focus group discussions. These gatherings is an effective platforms for the disclosure information about project design and the possible environmental and social impacts of the project.

Stakeholders in Gassol have cohesion in all their associations. The UBRBDA project manager can rally all the groups at short notice. There is also the use of the traditional town crier as an information dissemination channel, which the stakeholders claim is most effective in the community.

Once the implementation is underway, all groups will need to be organized into one Water Users Association for ease of management and cohesion. The majority of communication activities can be done through the water Users Association, including the process of grievance redressal. Because every water user will be part of the association, which can be a major grassroots level of grievance uptake channel. Information to the public about the project can be passed through the mass media, the website of the project and the project quarterly newsletter.

All meetings will be recorded in detail both for future references and management briefs and action points will be.

### **3.5. Vulnerable Persons**

#### **3.5.1 People with Disabilities**

In almost all the locations, there are vulnerable people who are engaged in farming. However, there is no indication that disability was a source of discrimination or exclusion. An association exists in Doma town that rallies people with disability but only some of them are members of the farmers' association.

In Gassol too, people with disabilities also formed a group but according to the stakeholders, the group is not very functional. There is also within the three project communities' people who are landless and with no access to social assistance.

#### **3.5.1 Women**

In Gassol and Doma where there is a lot of activities going on, there are clear indications that the women have been able to circumvent whatever prejudices against them by forming themselves into formidable women groups around different trades, including farming. In all locations, women are allowed to own and cultivate lands. However, in Naka, there was a norm that women cannot inherit from their fathers.

# CHAPTER 4. STAKEHOLDER ENGAGEMENT PROGRAMME

## 4.1 Purpose and Timing of Stakeholder Engagement Program

This plan is designed to ensure that stakeholders are provided with timely, relevant, understandable and accessible information, and consultation with them is done in a culturally appropriate manner which is free of manipulation, interference, coercion, discrimination and intimidation.

Transparent engagement between the SPIN and project stakeholders is essential. Engagement with Stakeholders is throughout the life cycle of the project and this SEP is designed to represent the roles and involvement of each stakeholder at every stage of the project such as preparation, planning and implementation. If additional stakeholders who are identified during the project preparation and implementation, this group should be captured in this SEP as well.

The nature, scope, and frequency of stakeholder engagement with each group of identified stakeholders will be affected by the following factors:

1. How Stakeholders have been prioritized in according to Tables in chapter 3
2. Stakeholder expectations and project risk and impacts.
3. Peculiarity of vulnerability of the people, most especially the disabled.
4. Cultural and religious factors.
5. The principles of timeliness, transparency, accessibility, accountability and participation.

### 4.1.1 Expected Outcome / Purpose of the Engagement Process

The engagement process as designed is envisaged to facilitate the following outcomes:

1. Strengthened development outcomes of SPIN through effective partnerships.
2. Plan of action that clearly identifies the means and frequency of engagement of each stakeholder identified earlier.
3. Identification of roles and responsibility of all stakeholders identified and their participation in the complete project cycle ensured.

4. Appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups.
5. Recognizing and effectively addressing potential constraints and conflicts that could affect effectiveness.
6. Capacity building program for Stakeholders as well as implementing agencies.
7. Provision of meaningful access to discussion and decision making in development processes; and
8. Adequate feedback and monitoring mechanism to ensure the project is attaining its intended results and detects potential unintended consequences.

#### **4.1.2 Management of Stakeholder Participation and Expectations**

The power dynamics and cultural norms of a local context can affect stakeholders' participation. In communities where women observe 'pudah' (seclusion from public appearance), such women may be cut off from participation if the consultation process does not take into consideration such cultural practices in existence. This practice can be accommodated by conducting focused group discussions chaired by female officials to ensure that the women are engaged in a manner that will encourage full and willing participation. Evidence from consultations undertaken for other projects on challenges show that stakeholders can be bored by incessant consultations especially where expectations are not being met or where project preparation process is perceived as taking lengthy time.

1. In managing stakeholder expectations, the project shall adopt the following:
2. Conduct adequate awareness, sensitization, and consultation on the scope, identified risks and impacts of the project and its intended results through means identified in table 9 below.
3. Ensure transparency through information disclosure as contained in Table 8.
4. Engagement events to occur in line with the SEP schedule in Table so that there is clear linkage between engagement activities and the project stages; and
5. Ensure that engagement is accessible and managed so that it is culturally appropriate, adequate, and timely information and opportunities are provided to all stakeholders to be involved/contribute.

Table 8: Stakeholder Consultation Methods

SN	Consultation Methods	Targeted Stakeholders
1	Public Consultations	Every Stakeholder, especially communities
2	Focus group discussions (FGDs)	Women group, youth group, disabled, Institute and other agencies involved, Traditional/Faith based Leaders. Focus group discussion is helpful in ensuring that stakeholders, whether majority or minority groups are fairly engaged, and provided the opportunity to state their concerns and contributions independently and freely to the proposed project plan.
3	Face to face meetings and workshops	Government Ministries and Departments, NGOs, Traditional rulers,
4	Correspondences (Radio, Phone, Emails) Town hall meetings	Every Stakeholder
5	Religious meetings, village meetings, through traditional leaders, Associations	Community members and farmers, Herders, water user's association etc.
6	Project Websites	Every Stakeholder with internet access
7	Advocacy and sensitization through the use of IEC materials including banners, signposts and flyers Every	Stakeholders and other community members and citizens who have interest in information emanating from the project.
8	Virtual meetings	Ministries, Departments and Agencies involved in any aspect of the project

To ensure stakeholder participation without the occurrence of stakeholder fatigue, Table 9 below provides a plan for engagement. The plan clearly indicates a) the project stage at which the engagement should take place, b) the objective of the engagement, c) key activities to be undertaken at each project's stage, d) the target stakeholder (s) to be engaged, e) the platform of the engagement, f) the 'when' of the engagement and, g) Key duty bearer. Where possible, stakeholder engagement plan for the project shall utilize already existing engagement structures within the national system - such as the communal meeting.

Table 94: Planned stakeholder engagement activities by project phase

Project stage	Objective	Primary Topic(s) of engagement and activities	Target stakeholders	Engagement Technique/ Platform of Contact	Location/frequency	Responsibilities
Planning and approval and preconstruction	Objective: Disclose relevant project information to stakeholders and solicit their views inputs/feedback into E&S documents, and other plans	Draft ESMF, ESMP, RF, SEP disclosures, including Environmental and social Due Diligence Project alternative Project scope and rationale; Project E&S principles; receive feedback on the project's, potential impact, expectations, and concerns Grievance mechanism process	Community members in the project host communities Crop farmers Land owners Tenants and Leaseholders Landless or Squatters Livestock farmers Cattle herders Reservoir fishers Farmers associations Women Farmer Groups Water Users associations, Wage Laborers and Workers Small-Scale Business Owners Community Associations and Interest Groups Vulnerable groups, including IDPs	Through traditional & religious leaders, village meetings, religious centers, Association meetings Public meetings, workshops, separate meetings specifically for women and vulnerable; Social Media, banners, signposts and flyers, radio; Face-to-face meetings; visits to affected vulnerable groups and individuals; Disclosure of written information - Brochures, posters, flyers, website Information desks – project area, State and National level; Grievance mechanism process; GBV/SEA	Monthly or as needed in the host communities.	FPMU, E & S Consultants, NGO
	Addressing issues related to land and possible land need	Land acquisition process, if required Resettlement and livelihood restoration options Project scope rationale and E&S principles	Traditional leaders, Faith based groups Community Based NGOs trade associations and groups	Meetings, Joint Public/community meetings with project affected peesons (PAPs)	As needed	FPMU with E & S Team.
		Project alternatives Scope of the potential impacts and mitigation measures and benefit enhancers, Land acquisition process, if Required , Project environmental and social (E&S) principle ,E&S principles Grievance mechanism process	Office of the State Governor, Ministry of Finance, Ministry of Environment, Ministry of Agriculture, Ministry of Water Resources, Ministry of Local Government Affairs, Ministry of Education; Ministry of Women Affairs,; Ministry of Works; Ministry of Information Traditional and Faith base groups	Workshops, project information and education materials such as project information sheets, social media communication (virtual meetings and WhatsApp groups), written correspondence, radio, one on one advocacy meetings	On the each ES&S document milestone and as needed	FPMU Coordinator, Social Safeguard Specialist, Communication Officer with support from consultants



Project stage	Objective	Primary Topic(s) of engagement and activities	Target stakeholders	Engagement Technique/ Platform of Contact	Location/frequency	Responsibilities
		Present the finale E&S documents and related plans for comments and feedback	Community members in the project host communities Crop farmers Land owners Tenants and Leaseholders Landless or Squatters Livestock farmers Cattle herders Reservoir fishers Farmers associations Women Farmer Groups Water Users associations, Wage Laborers and Workers Small-Scale Business Owners Community Associations and Interest Groups Vulnerable groups, including IDPs	Public Consultation meeting and focused group discussion.	Once these documents are available	FPMU/ Social Safeguard Specialist; Communication Officer with support from consultants
		Present the finale E&S documents and related plans for comments and feedback	Office of the State Governor, Ministry of Finance, Ministry of Environment, Ministry of Agriculture, Ministry of Water Resources, Ministry of Local Government Affairs, Ministry of Education; Ministry of Women Affairs,; Ministry of Works; Ministry of Information Traditional and Faith based groups	Workshops, project social media communication (virtual meetings), one on one advocacy meetings	Once these documents are available	FPMU/ Social Safeguard Specialist; Communication Officer with support from consultants
	<b>Preconstruction</b>  <b>Objective:</b> Engagement activities to prepare stakeholders for construction phase	Present Contractor E&S documents, including Social Management Plans (ESMP), for comments and feedback  Sensitization on risks accruing due to labour influx caused by construction,  Mitigation measures and on GRM available.	Community members in the project host communities Crop farmers Land owners Tenants and Leaseholders Landless or Squatters Livestock farmers Cattle herders Reservoir fishers Farmers associations Women Farmer Groups Water Users associations, Wage Laborers and Workers Small-Scale Business Owners Community Associations and Interest Groups	Traditional & Religious Leaders, Village meetings, Religious centers, Association meetings, focused group discussions with women, youth and children, GRM, Advocacy and sensitization through communication materials	As required	FPMU/ Social Safeguard Specialist; Communication Officer with support from consultants, NGOs

Project stage	Objective	Primary Topic(s) of engagement and activities	Target stakeholders	Engagement Technique/ Platform of Contact	Location/frequency	Responsibilities
			Vulnerable groups, including IDPs			
Stage	Objective	Primary Topic(s) of engagement and activities	Target stakeholders	Engagement Technique/ Platform of Contact	Location/frequency	Responsibilities
Construction phase and Operation phase	Present Construction Contractors ESMPs, Community Livelihood Action Plans and related plans.	Present the Construction Contractors Environmental and Social Management Plans (ESMPs) and other plans for comments and feedback	Traditional leaders, Faith based groups, Community Based NGOs, and Trade associations and groups	Meetings, Joint Public/community meetings with Project affected persons (PAPs)	As needed	FPMU Social Safeguard Specialist; Communication Officer, Consultants, NGO
		Present Contractor E&S documents, including Social Management Plans (ESMP), and other plan for comments and feedback	Office of the State Governor, Ministry of Finance, Ministry of Environment, Ministry of Agriculture, Ministry of Water Resources, Ministry of Local Government Affairs, Ministry of Education; Ministry of Women Affairs,; Ministry of Works; Ministry of Information Traditional and Faith based groups	Workshops, project social media communication (virtual meetings), one on one advocacy meetings	As require	FPMU Social Safeguard Specialist; Communication Officer, Consultants, NGO
		Ongoing consultation on and acquisition and resettlement	Project affected persons and businesses identified during planning phase, the trade associations and groups,	Face-to-face meetings; Trainings/workshops; Joint public/community meetings with PAPs	Monthly or As needed	Grievance Redress Committee. Social Safeguard Specialist, Communication Officer, Consultant
	Provide regular updates on construction activities, implement management plans and monitor the effectiveness of the plans Handling of complaints in a prompt and effective manner	Regularly update on construction activities, including key milestones, key changes in the Project design, and monitoring results from the ESMPs, Health and safety impacts	Traditional leaders, Community members, Project affected persons and businesses identified during planning phase., Trade associations and groups	Face-to-face meetings Joint public/community meetings with PAPs	Once a month and as needed Community/ beneficiary Perception / satisfaction  Surveys – annually	Communication, Social Safeguard Specialist, Communication Officer, Consultant

Project stage	Objective	Primary Topic(s) of engagement and activities	Target stakeholders	Engagement Technique/ Platform of Contact	Location/frequency	Responsibilities
Post-construction and Operation phase	Effectiveness of the plans Handling of complaints in a prompt and effective manner	Construction related safety measures. Disclose and consult on Construction Contractor activities, hiring preferences, job and business opportunities, training opportunities etc	Traditional leaders, Community members, Project affected persons and businesses identified during planning phase. Trade associations and groups	Face-to-face meetings Joint public/community meetings with PAPs	Once a month and as needed Community/beneficiary Perception / satisfaction  Surveys – annually	Social Safeguard Specialist; Communication Officer, Consultant Site Committee, GRM,
	Maintain constructive relationships with stakeholders and maintain awareness of environmental and safety practices in the local communities Engagement will focus on day today operation of the Project	Engagement with stakeholders to maintain good relationships and provide update on the Project progress Manage community issues and monitor community attitudes Complaint handling  Environmental and safety awareness program Emergency preparedness, and response Day-to-day engagement with stakeholders to maintain good relationships and provide update on the Project progress_	Project Affected persons (PAPs) Community members in the project host communities Crop farmers Land owners Tenants and Leaseholders Landless or Squatters Livestock farmers Cattle herders Reservoir fishers Farmers associations Women Farmer Groups Water Users associations, Wage Laborers and Workers Small-Scale Business Owners Community Associations and Interest Groups Vulnerable groups, including IDPs	Traditional & Religious Leaders, Village meetings, Religious centers, Association meetings, GRM, Radio  Village meetings, Religious centers, Association meetings, GR radio, Brochures, Factsheets, signposts and banners	As needed  As needed	NGO engaged by FPMU and Supported by Communication and Social Safeguard Specialist, Relevant government agencies  NGO to be engaged by FPMU supported by Communication and social Safeguard Specialist

### 4.3: Proposed Strategy to Incorporate the Views of Vulnerable Groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of specific techniques for vulnerable groups, mainly persons with disabilities, women-headed household and unemployed persons, land less and farmless, those in extreme poverty (list has been provided under Section 3.2.2. Such techniques may include reach out visits to individuals or families at their homes; holding separate small group discussions and awareness for men and women at an easily accessible venue; and reaching out to women through Women Associations to ensure inclusiveness.

If necessary, FMWRS, through FPMU will provide transport to public meetings for vulnerable people and will also deliver brochures and informational material to such households. These approaches help the project to reach out to the groups who are likely to be insufficiently represented at community gatherings.

#### 4.4:3. Summary of stakeholder engagement done during project preparation in the three pilot areas

As a part of project preparation, the Federal Ministry of Water Resources and Sanitation (FMWRS) initiated stakeholder engagement programs. These include meetings with field officers and other functionaries of the Upper Benue RBDA and lower Benue RBDA. These engagements enabled a situation analysis of each of the pilot sites.

Also, there were meetings with the various groups with interests in the project to determine who is likely a project affected party or other interested party. These exercises also helped determine the attitudes of individuals and communities to the incoming project. In all three prospective project sites, all stakeholders were excited about and anticipated the project. They were also informed about the potential benefit of the project.

Engagements were held on 7<sup>th</sup> and 8<sup>th</sup> of February 2024 in Doma town at the palace of Andoma, at the RBDA office at the outskirt of the town and around the Doma Dam command area.

The community leader, the Andoma of Doma, assured the FMWRS that all the support needed to make the Doma Dam better for the benefit of the people will be provided. The same support was echoed by the community leaders in Naka and Gassol. The Naka stakeholders were engaged in Markurdi on 9<sup>th</sup>, 10<sup>th</sup>, and 11<sup>th</sup> at the headquarters of the RBDA and in a public park. This was based on the information that public gathering of any kind in Naka would heighten security risks. The

stakeholders in Gassol were engaged on 12<sup>th</sup> of February 2024 at the RBDA office and around the command area of the pond.

#### **4.4.1. Summary of SPIN Project's stakeholder needs and methods, tools and techniques for stakeholder engagement.**

Since the SPIN Project is still at the preparatory stage, there is a strong need that the stakeholders be carried along in all the processes of preparation and implementation. Already there are challenges faced by some key stakeholders in the various sites. An understanding of some of these challenges from the onset will help both the design and implementation of the Project. For instance, it was noted that in all the sites visited, there was a strong cohesion within the trade associations and groups, making such associations instrumental for stakeholder engagement. There is a sound loyalty to the leadership of these groups who are elected by the members. These areas also face many challenges, such as overfishing, Illegal farming in command areas, fishers' net destruction by cows, drying water sources, water pollution through fishing chemicals, herders graze rice farms in Doma alone. Stakeholders in Naka and Gassol also state their current challenges which include flooding during rainy season, settlers occupying the bank of dam reservoir, encroachment on the dam area by mud brick makers, shallow wells around the dam and living houses springing up within the command area. All of these can guide project design and future community involvement.

### **4.5 Proposed Strategy for Information Disclosure**

The objective of the information disclosure plan is to ensure that appropriate project information, particularly activities on environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. The SPIN project SEP makes provision for disclosure of safeguard documents to project-affected and other interested stakeholder who were identified during the preliminary research done in the three pilot areas and will be updated once the exact areas are identified. The disclosed documents which shall be in English language will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access as follows:

1. Federal Ministry of Finance
2. Federal Ministry of Water Resources and Sanitation
3. Federal Ministry of Environment,
4. Federal Ministry of Agriculture

5. State Ministries of Local Government Affairs,
6. Federal Ministry of Women Affairs,
7. Federal Ministry of Works
8. Project Management offices
9. State Water Boards
10. State Ministries of Agriculture

Translation of the executive summaries in relevant local language and its posting in the designated community centers is expedient to successful stakeholder engagement. This is to ensure that language barriers do not create a communication breach thereby failing to include all stakeholders. Electronic copies of the SEP for disclosure will be placed on the website of the World Bank and implementing agencies. This will allow stakeholders with access to internet to view information about the project and to initiate their involvement in the public consultation process. The website will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

*Table 10: Information disclosure strategy*

<b>Stakeholders</b>	<b>Project Information Shared</b>	<b>Means of communication/ disclosure</b>
Ministries, Departments and Agencies (MDAs).	Safeguard Documents. Regular updates on Project development; including proposed design / livelihood enhancement and support programs /community. empowerment program. Additional types of Project's information if required for the purposes of regulation and permitting	Dissemination of hard copies Project status reports Meetings and round tables Virtual Meeting online, webinar Project website
National and local NGOs, associations, including village associations	Safeguard Documents. Public Grievance Procedure. The duration of proposed project activities. The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate. GRM in place. Regular updates on Project development including proposed design / livelihood enhancement and support programmes /community.	Electronic publications and press releases on the Project website. Dissemination of hard copies at designated public locations. Press releases in the local media (Radio). Consultation meetings – village meetings/ Association meetings. Information leaflets and brochures. Virtual Meeting
Other affected parties/ interested persons	Safeguard Documents. Public Grievance Procedure. The duration of proposed project activities.	Electronic publications and press releases on the Project website. Dissemination of hard copies at designated public locations.

Stakeholders	Project Information Shared	Means of communication/ disclosure
	<p>The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate.</p> <p>GRM in place</p> <p>Regular updates on Project development including proposed design / livelihood /community</p>	<p>Press releases in the local media (Radio Jingles).</p> <p>Consultation meetings – village meetings.</p> <p>Association m Information leaflets, pictograms and brochures which shall be translated to the local language obtainable in the localities.</p> <p>Separate focus group meetings with vulnerable groups, during Stakeholder Consultations</p>

### 4.5.1 Timeline

The disclosure process of this Stakeholder Engagement plan will be executed within the following time frame.

*Table 11: Disclosure Timeline*

Activity	Date/Phase
Placement of the SEP in public domain	Prior to date of project appraisal by the WB board
Public consultation meetings with project stakeholders to discuss feedback and perceptions about the program	During project preparation stage
Addressing Stakeholder feedback on the disclosure exercise	During project preparation stage and before appraisal

### 4.5.2 Feedback

The following channels will facilitate feedback on information disclosed, perception about the project and other input:

1. The local NGOs aside their traditional advocacy and enlightenment roles, will serve as an intermediary between the affected/beneficiary stakeholders and the FPMU to receive such feedback as contained in this section. The NGO is to be identified and engaged by the FPMU.
2. The SPIN project website for information disclosure will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials. This will allow stakeholders with access to internet to view information about the project and to initiate their involvement in the public consultation process.

3. The stakeholders will also make use of the free toll lines that will be made available by the FPMU to communicate concerns and feedback to the FPMU.
4. Feedback will also be received using the email address of the FPMU.

## 4.6 Future Phases of Project

The principles and methods in this SPIN will be adopted for all participating schemes and dams in the project. The implementation timing will also be adapted to the implementation period of each project scheme. Since Stakeholder identification will be ongoing and subject to the details of project implementation, the SEP will be updated by the FPMU to ensure effectiveness in implementation.

## 4.7 Capacity Building and Training for Stakeholder Engagement.

Stakeholder engagement is a continuum and runs throughout the project lifecycle; hence, the need to develop adequate capacity. The successful implementation of effective stakeholder engagement will require adequate capacity for the FPMU. Capacity building efforts shall focus on the FPMU who are primarily responsible for the implementation and monitoring of the stakeholder engagement process for the project, as well as other implementing and monitoring partners. The table below presents identified capacity development or strengthening needs for the SPIN SEP.

Table 12: Capacity Building Plan

S/N	Capacity	Target Group(s)	Timeline
1	SEP Implementation capacity	FPMU, Community Associations and Focal groups	One during project preparatory phase and another during implementation phase and any other time as may be need induced
2	Facilitation of stakeholder engagement	FPMU, Community Associations and Focal groups	One during project preparatory phase and another during implementation phase and any other time as may be need induced
3	Community-focused awareness creation on Citizens Engagement and Social Accountability	FPMU, Community Associations and Focal groups	One during project preparatory phase and another during implementation phase and any other time as may be need induced
4	Monitoring of implementation	FPMU, Community Associations and Focal groups	One during project preparatory phase and another during implementation phase



			and any other time as may be need induced
5	Stakeholder engagement data management	SPIN Safeguards Team, M&E and GIS Team	One during project preparatory phase and another during implementation phase and any other time as may be need induced
6	Management of Grievance during SEP	SPIN Safeguards Team	One during project preparatory phase and another during implementation phase and any other time as may be need induced

## 4.8: Security Provision during Stakeholder Consultation in Remote Communities

During Stakeholder consultation exercise in the preparation of this SEP, it was discovered, especially in Naka, that security challenges may arise in the process of stakeholder consultations. The SPIN Project will be required to conduct Security Management Plan before the commencement of civil works.

# CHAPTER 5: RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING SEP

## 5.1. Implementation Arrangements and Resources

To directly implement the SEP for SPIN, the project shall appoint a social safeguard officer at the FPMU to implement the SEP for the project. The overall responsibility for stakeholder engagement will lie with the Project coordinator or manager. The social safeguard officer shall plan and execute SEP in all

sites and at all required times. The officer shall work closely with the environmental safeguard officer, also appointed into the FPMU. The project will also appoint a social officer in each of the project scheme sight that will do the groundwork for community entry activities and the operationalization of the SEP.

The budget estimate for the preparing and implementing SEP shall be 80,013,719.00 (Eighty-eight million, thirteen thousand, seven hundred and nineteen naira (per annum.)

The budget breakdown can be found in Annex 4.

# CHAPTER 6: GRIEVANCE MECHANISM

This section details the proposed grievance mechanism that will be used to identify, track, and manage grievances raised by Project stakeholders. This mechanism as set out below takes into consideration existing grievance redress systems already in place.

All issues related to GBV and SEA/SH as well as complaints involving children must be dealt with in a confidential manner and through a separate channel as explained below.

## 6.1 Objectives of Grievance Mechanism (GM)

1. To address grievances promptly and effectively, in a transparent manner resulting in outcomes that are seen as fair, effective and lasting.
2. To provide a grievance management process that takes into consideration culture and tradition practiced in the area (this may include female members of Grievance Readdress Committee (GRC), handling complaints involving women in areas where female seclusion is practiced, and which is readily accessible to all Project affected parties.
3. To build trust as integral component of the Project community relations activities.
4. To enable a systematic identification of emerging issues facilitating correcting actions and pre-emptive engagement; and
5. To cut down on lengthy litigation, which may hinder effective implementation of projects.

## 6.2 Potential Issues that may Necessitate GM

Possible grievances that may emerge include, for example:

- Community member not adhering to cut-off date as announced during consultation.
- Losses not identified correctly.
- Under Compensation for loss of assets.
- Dispute about ownership of affected assets.
- Delay in disbursement of assistance and improper distribution of assistance.
- Land acquisition, restriction of access and displacement.
- Non-inclusion of community members in paid labour/workforce.
- Omission of eligible PAPs.
- Uncompensated loss of assets.
- Delay in execution of sub-projects leading to breakdown of trust.

- Non-implementation or discrepancies in the implementation of SEP/LMP/and site-specific Resettlement Action Plans (RAPs) and other documents as stipulated in the report; and
- Potential risk of Gender based violence/sexual harassment of locals as a result of labor influx.

Table 53. Grievance mechanism for non-sensitive cases (no allegations of SEA/SH)

[Step]	Description of process (e.g.)	Timeframe	Responsibility
GM implementation structure	The grievance redress mechanism shall be in three levels. These levels will be at the association level, at the project management on the site and finally at the FPMU level in case there was no resolution	The process from the beginning to the end should not exceed 40 days	Social safeguard officer (SS), social officer. The Social safeguard officer is at the FPMU while social officer will be required to be a staff on site at the dam office
Grievance uptake	Grievances can be submitted via the following channels [select and specify as appropriate] Toll-free telephone hotline: Short Message Service (SMS) to E-mail to Letter to the Project manager In-person at a physical facility project offices at scheme level, at national level Grievance or suggestion boxes located at scheme sites, corporate office Social media handles of the project Online form on the SPIN Project website	2 to 5 days	Social safeguard officer, social officer, GBV officer
Sorting, processing	Any complaint received is forwarded to association secretary or project social officer and logged in SPIN GRM log; categorized according to the following complaint types: Irrigation, labour, GBV	Upon receipt of complaint	Social Officer, GBV officer.
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by the social officer	Within 2 days of receipt	Social Officer
Verification, investigation, action	Investigation of the complaint is led by the association chairman at the association level, project manager at the scheme level and the social safeguard officer at the FPMU level. A proposed resolution is formulated by consensus and communicated to the complainant by the social officer	Within 10 working days	Complaint Committee composed of five member at the association level, Project manager and two other officials at the at the scheme level and at the FPMU the SS officer and three others.
Monitoring and evaluation	Data on complaints are collected in a complaint ledger and reported to the project manager quarterly	After every quarter	SS Officer

Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by the SS officer	As they come	SS Officer
Training	Training needs for staff/consultants in the FPMU, Contractors and Supervision Consultants are on alternative dispute resolution	Yearly	FPMU
If relevant, payment of reparations following complaint resolution	In case of compensation, it shall be approved by the project Coordinator and paid within six weeks	As they come	FPMU
Appeals process	Any unsatisfied client can escalate their complaints to higher level of resolution in the FPMU structure or ultimately to the multi-door courtroom or arbitration centre	After 40 days	The unsatisfied complainant

### **Complaints of GBV SEA/SH and complaints involving children**

Complaints of Gender -Based Violence and child abuse, especially child labour will be handled with utmost discretion in order to protect the affected persons. Child's Right Act (CRA 2003) guarantees the rights of all children (Persons below 18 years) in Nigeria. Twenty four out of 36 states of Nigeria have adopted the CRA as a state law. A third of the states (12 states) are yet to adopt the CRA in their laws. Also, the Violence Against Persons Act (VAP Act 2015) also protects persons against gender-based violence.

The Federal Ministry of Women Affairs and all the corresponding state ministries have repositories of GBV service providers as well as Child Rights Departments that can handle such cases. To get GBV grievance or complaints resolved, any person that is aggrieved will report mostly to any of the uptake points. All GBV GM emanating from/on the project will be registered and referred to the GBV GM desk officer (or Gender Specialist) at the FPMU within 24 hours. Complainants can also report directly to the GBV GM desk officer at the FPMU directly through a GBV toll free line (to be provided). In the case of GBV cases that are brought in through any of the channels, the social officer will take charge of the registration process and refer immediately to the Gender Specialist, who will link the case up to the appropriate GBV service providers. It is the duty of only the Gender Specialist to demand details of the case, having been trained for this purpose. The gender specialist can then send the case to the appropriate service providers which will range from hospitals to human rights lawyers and psycho-social counsellors. All issues related to GBV will be dealt with in a confidential manner explained below.

The GM procedures will include additional guarantees to manage anonymous and GBV related grievances: The GM system will be communicated to stakeholders as giving opportunities to anonymous complaints reporting process. Some complainants may choose to file a complaint

anonymously. Channels to accept and respond to anonymous grievances will be communicated to project affected parties during the consultation meetings and throughout project implementation. This will be made possible through telephone grievance uptake channels and anonymously written complaints. Anonymous complaints should provide factual details and specific allegations of misconduct or serious wrongdoing related to any of the project activities.

The project's Gender Specialist will be responsible for addressing and responding to complaints related to children, and women who may be exposed to violence, sexual exploitation and abuse and sexual harassment, working closely with the Ministry of Women Affairs which has a Gender Department and Vulnerable Children department. An email address and a telephone number (being processed) will be communicated to project's affected parties during consultations and through different stakeholder engagement methods. The Gender Specialist will be responsible for managing this type of complaints with high priority, seriousness, data protection and privacy. The Ministries of Women Affairs of each state have identified GBV Service Providers and have drawn up referral pathways which are available in their gender departments. No officer without training and authorization in the management of GBV cases should make even an attempt to investigate GBV cases. Referral is their only option.

The following sexual harassment and sexual abuse grievance procedures, regulations will be followed:

- Accept the grievance/ complaint through the GRM available channels, including anonymous grievances.
- Provide the complainant with the option of anonymity and request their consent to be contacted by the Gender Specialist
- Upon agreement from the victim, refer the victim to a specialized unit in handling GBV incidents at the Ministry of Women Affairs.
- Follow up with the complainant, if they have provided their consent, to ensure just and proper care is provided to them. And obtain feedback from the NGO regarding the case for filing and closure.

## **7. MONITORING AND REPORTING**

### **7.1. How SEP Will Be Monitored and Documented**

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and that stakeholders have been meaningfully consulted

throughout the process. The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. All proceedings of stakeholder events will be recorded in a minute book which will be consulted later for data that needs to be mined for decision making on the project. The minute book will help determine what worked and what has not worked in the engagement process to be able to fine-tune the strategies from time to time.

Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. The final SEP will have a Monitoring and Evaluation (M&E) action plan which will guide all M&E activities related to the SEP. The two keyways in which the stakeholder engagement process, as will be provided for in the M&E action plan, will be monitored are through review of Engagement activities in the field and through reporting engagement activities.

#### **7.1.1 Review of Engagement Activities in the Field**

During engagement with stakeholders the E & S team will assess meetings by asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly. Conduct debriefing sessions with the engagement team while in the field. This will help to assess whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.

For example, surveys will be randomly conducted on project sites to garner some quantitative data about the process. Questions like “how many times a year will you be willing to come out on to meet the project implementers” for instance can be used to determine the suitable frequency of engagement.

Focus group discussions will also be deployed at random to determine what the stakeholders would rather do or not do on the project and the reasons.

Community scorecard is another tool that will be deployed to get honest feedback from the stakeholders on the performance of the activities around the implementation of the project.

#### **7.1.2 Reporting Stakeholder Engagement Activities**

Performance will be reviewed following the engagement sessions conducted in the field. In addition, there will be opportunities to review and assess performance in-between the engagement sessions depending on the level of feedback received from stakeholders during these periods. Evaluation of

performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance, indicators will be crafted around the following areas:

1. Materials disseminated: types, frequency, and location.
2. Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. women, youth, community leaders)
3. Number of comments received on specific issues, type of stakeholder and details of feedback provided.
4. Numbers and type of stakeholders who come into contact with the Project team by mail, telephone and any other means of communication.
5. Meeting minutes, attendance registers and photographic evidence.
6. Comments received by government authorities, community leaders and other parties and passed to the Project.
7. Numbers and types of feedback and / or grievances and the nature and timing of their resolution, and
8. The extent to which feedback and comments have been addressed and have led to corrective actions being implemented.

Monthly summaries and internal reports on the implementation of the SEP and GRM, together with the status of implementation of associated corrective/preventative actions will be systematized by the FPMU Social Safeguards Specialist and reported to the Project Coordinator. The monthly summaries will provide a timely mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner and adjust its operations or approach as necessary.

## **7.2. Reporting back to stakeholder groups**

To gain trust with stakeholders and increase accountability, timely report from the SPIN project to the stakeholders will not only serve good practice but strengthen the relationships with stakeholders. To this end, there will be a quarterly publication of newsletter that will give reports of activities, including outcomes of stakeholder engagement initiatives.

An annual lighter mood event will also hold where stakeholders will be invited, and outcomes of scorecards will be presented with a view to using them to improve relationship and project implementation.



Data pertaining to grievance redressal on the project will also be part of what will be shared in the project newsletter and made accessible on the project website

# ANNEXES

## Annex 1. Estimated one year budget for Stakeholder engagement.

COST OF IMPLEMENTING STAKEHOLDER ENGAGEMENT FOR THE FIRST YEAR OF SPIN PROJECT				
Staff Salaries	Cost	Unit	Frequency	Sum (Naira)
Communication Specialist	800,000.00	1	12	9,600,000.00
Liason officers	250,000.00	3	12	9,000,000.00
Travel cost for staff	425,000.00	4	5	8,500,000.00
Communications				
-				
Sensitization/communication campaigns	500,000.00	3	9	13,500,000.00
Production of IEC materials	15,005,520.00	1	1	15,005,520.00
Website building and management	1,600,000.00	1	1	1,600,000.00
Quarterly newsletter	950,350.00	1	4	3,801,400.00
Capacity building	250,000.00	20	3	15,000,000.00
Engagement Monitoring & Evaluation				
Staff travels	425,000	2	5	4,250,000.00
Total				80,256,920.00
GRM (10% of total				8,025,692.00
Sub Total				88,282,612.00
Inflation Allowance of 25%				22,070,653.00
Grand Total				110,353,265.00

## Annex 2. Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
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GRM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	Are project-affected parties raising issues and grievances? How quickly/effectively are the grievances resolved?	Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion boxes placed in the villages/project communities. Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	Records from the implementing agency and other relevant agencies
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?	Was there interest and support for the project? Were there any adjustments made during project design and implementation based on the feedback received? Was priority information disclosed to relevant parties throughout the project cycle?	Active participation of stakeholders in activities Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	Stakeholder Consultation Attendance Sheets/Minutes  Evaluation forms  Structured surveys  Social media/traditional media entries on the project results

Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	Were the activities implemented as planned? Why or why not? Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?	Percentage of SEP activities implemented. Key barriers to participation identified with stakeholder representatives. Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.	Communication Strategy (Consultation Schedule)  Periodic Focus Group Discussions  Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives
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### Annex 3 Photographs of Engagement



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