

7 STAKEHOLDER ENGAGEMENT

7.1 Introduction

The term “stakeholder engagement” is a means of describing a broad, inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of a project (IFC 2007).

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.

Stakeholder engagement has been an integral part of the project to date. Stakeholder engagement activities have been undertaken by the pipeline project team, including community liaison officers (CLOs), and consultants including the:

- resettlement teams
- geophysical and geotechnical survey CLO teams
- environmental and social impact assessment (ESIA) teams as part of their specific activities and aimed to provide stakeholders with information and to receive their inputs.

This section focuses on stakeholder engagement during the ESIA process and explains how it fits in with the project team engagement. Stakeholder engagement is an integral component of the ESIA process and the foundation for developing and maintaining the social licence to construct and operate the pipeline.

Stakeholder engagement during the preparation of the ESIA has been undertaken in accordance with the requirements of Ugandan legislation, international requirements as set out in the Equator Principles III and the International Finance Corporation (IFC 2012) and project policies for stakeholder engagement.

7.2 Stakeholder Engagement Principles and Protocols

The following principles are the basis for the ESIA stakeholder engagement:

- *Open and Transparent:* Information relevant to project activities will be as accessible and transparent as possible, providing stakeholders with a comprehensive understanding of project activities and how they are or may be affected by them (unless legitimate reasons for commercial confidentiality or the protection of stakeholders require that it be kept confidential).
- *Based on Listening and Dialogue:* Stakeholders will be listened to, their concerns taken seriously, and responses provided in a timely manner to address their concerns.
- *Participative:* Stakeholders will be invited and encouraged to actively engage with the project. The project will be inclusive in this process taking into account factors such as gender and cultural considerations and ensuring stakeholders feel they have an opportunity to share their perspectives.

- *Proactive*: The engagement process will provide information in advance of consultation activities and decision-making points. Potential risks and impacts will be communicated proactively with stakeholders.
- *Impact-focused*: During the impact assessment process, engagement with communities potentially affected by the pipeline will be, whenever possible, focused around the benefits and potential and actual negative pipeline impacts that may concern them in order to jointly identify appropriate avoidance, mitigation and compensation measures. Other stakeholders indirectly affected by the project's impacts may also be consulted.
- *Safe*: Steps will be taken by the project toward ensuring stakeholder engagement is free from manipulation, interference, coercion or intimidation. Any stakeholder that participates in any form of engagement can do so in a safe and protected manner without risk or fear for retaliation (for example, through the use of trusted third parties, individual meetings or group meetings).
- *Effective*: Information and forms of engagement will be acceptable to and effective for the individuals for whose use they were intended and will be accessible, legitimate, transparent and human rights-compatible.
- *Appropriate*: Different forms of engagement may be required for different kinds of stakeholders and for different purposes. Information provided to stakeholders will be provided in formats appropriate to the stakeholder in question, considering the potential need to provide assistance for the interpretation of technically complex information.
- *Empowering and responsive*: Engagement should empower stakeholders to make their voices heard. This will include informing stakeholders of what they can expect in terms of feedback and responses to their inputs.
- *Equal and Human Rights respectful*: Everyone, without discrimination, will be afforded the right to participate on equal terms. The project will ensure a gender sensitive approach to engagement and identify the need for any special measures to ensure that vulnerable individuals and groups are inclusively engaged.

In addition to the above principles, project stakeholder engagement guidelines and protocols have been used to support respectful interactions during the stakeholder meetings, ensure consistency across stakeholder engagement teams in managing sensitivities, expectations and concerns and avoid mixed message. These include:

- protocol for photographing stakeholders and permission for use;
- cultural do's and don'ts in meetings
- protocol for recording cost reimbursements to stakeholders.

7.3 ESIA Stakeholder Engagement Objectives

The objectives of stakeholder engagement during the ESIA process were to:

- obtain an understanding of the number and types of stakeholders in the study area
- inform stakeholders about the project and the ESIA
- inform stakeholders about the engagement process and grievance management
- inform stakeholders about the ESIA baseline studies in the areas crossed by the pipeline and associated infrastructure

- obtain stakeholder input into the scope of the ESIA, including the development of valued environmental (and social) components (VECs), identifying sources of cumulative impacts, impact identification and potential sources of cumulative impact and impact mitigation
- listen to questions and concerns from stakeholders and ensure these are addressed in the ESIA
- conduct pre-submission meetings to consult a sample of potentially impacted local stakeholders before the submission to NEMA to get their feedback on ESIA findings (impacts and mitigation measures)
- provide feedback to stakeholders on the impact assessment, cumulative impact assessment and mitigation measures (disclosure)
- provide a mechanism for ongoing stakeholder engagement and ways in which the stakeholders can remain involved in the process
- ensure regulatory requirements and pipeline standards are met.

7.4 ESIA Stakeholder Engagement Planning

A stakeholder engagement plan (SEP) to support effective engagement throughout the ESIA process was developed. The ESIA SEP captures the ESIA engagement approach, stakeholder identification, specific engagement plans for the different ESIA phases and the key deliverables from engagement activities.

The SEP includes:

- a stakeholder identification and analysis process (see Section 7.5.1.1)
- methods, materials and protocols for stakeholder engagement including information disclosure, consultation and reporting to stakeholders (see Section 7.5.1.3)
- the ESIA stakeholder engagement programme (see Section 7.5)
- a data management system for all stakeholder data and minutes of meetings for analysis and follow up
- a project grievance procedure, which also serves as the ESIA grievance procedure (see Section 7.7).

7.5 ESIA Stakeholder Engagement Activities

7.5.1 Stakeholder Engagement During the Scoping Phase

7.5.1.1 Stakeholder Identification

A key element of the ESIA scoping phase was to identify stakeholders and determine their potential interest in, influence over or link to the project area of influence (AOI) through a systematic analysis. The identification process is crucial to ensure that a representative range of stakeholders, particularly those most vulnerable and directly affected, are incorporated within the ESIA engagement strategy.

When identifying and prioritising stakeholders, the following aspects were considered:

- Who could be adversely affected by environmental and social impacts in the AOI?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- Which stakeholders can best assist with the early scoping of issues and impacts?
- Who strongly supports or opposes the changes that the project will bring and why?
- Who is it critical to engage with first, and why? (IFC 2007)

Stakeholders were then identified through:

- inputs from project personnel and the ESIA team's local expert knowledge and experience
- previous ESIA's and other studies conducted in the area
- GIS analysis of the AOI to identify the location of communities
- site visits undertaken by the ESIA stakeholder engagement team comprising project personnel and the local expert consultants employed by the project
- stakeholder meetings.

Particular attention was paid to the identification of vulnerable people and groups directly affected by the project. The IFC defines disadvantaged or vulnerable groups as follows:

"Individuals or groups within the project area of influence who could experience adverse impacts from the proposed project more severely than others based on their vulnerable or disadvantaged status. This status may stem from an individual's or group's race, colour, sex, language, religion, political, or other opinion, national or social origin, property, birth or other status. In addition, other factors should be considered such as gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources."

Identification of vulnerable groups was undertaken during discussions at district level and subcounty level and with potentially affected communities (PACs).

The stakeholder categories and sub categories identified are presented in Table 7.5-1. The specific organisations consulted are listed in Appendix C1.

Table 7.5-1 Stakeholder Categories and Subcategories

Authorities	Directly Affected Groups Including Vulnerable People	Civil Society	Others
National government Local government (district/county and subcounty) Regulatory institutions Policy makers District technical experts Village elected officials Health and educational institutions Police	Landowners Local residents Farmers (nonland owning) Shopkeepers Traders Business owners Pastoralists (cattle herders) Fisherfolk Women (including women in the workplace) Minorities Youth (including unmarried) Elderly Sex workers Children (including orphans) Widows and female headed households People with mental and physical disabilities Chronically ill (i.e., those with HIV and AIDS) Refugees and migrants	Community groups and community-based organisations Media Nongovernmental organisations (NGOs) Religious leaders Traditional leaders and organisations Traditional leaders	Business sector Professional organisations Research institutions Academia Tourism service providers Emergency services

7.5.1.2 Scoping Stakeholder Engagement Objectives

The objective of scoping stakeholder engagement was to capture the main stakeholder considerations for the development of the terms of reference (ToR) for the EIS.

The specific objectives of the scoping phase engagement were to:

- identify stakeholders
- provide stakeholders with an overview of the proposed project activities, the potential impacts and opportunities and an understanding of the ESIA process
- document stakeholder views, concerns and expectations to inform the development of the scope of the EIS, including the development of the VECs.
- acquire stakeholder input to the development of the terms of reference (ToR) for the EIS.

7.5.1.3 Scoping Engagement Approach

To deliver the scoping phase objectives, meetings with key stakeholders were held:

- at national level
- in the two districts crossed by the pipeline
- in all subcounties with proposed AGIs or temporary construction facilities.

In addition, three PACs were consulted (see Figure 7.5-1). The PACs were selected taking into consideration:

- land uses (crop growing, grazing, natural resource use)
- locations of social and environmental sensitive, including important biodiversity areas
- locations of VECs.

Meetings

The scoping stakeholder meetings were held between 19 May and 2 June 2017. A total of 509 people participated in 29 meetings. Meetings were held with:

- 12 national level organisations including government agencies
- one umbrella organisation of NGOs (Civil Society for Oil (CSCO)). Thirteen NGOs were represented at the meeting
- district health authorities in both Buliisa and Hoima
- district authorities in Buliisa and Hoima
- subcounty authorities in eight subcounties
- one meeting with Kigorobyia Town Council
- three villages (Serule A, Kabolwa and Rwamutonga).

Appendix C1 contains the list of all stakeholders consulted during the scoping phase. Stakeholders who were consulted with specific reference to potential sources of cumulative impacts are included in Appendix C1 in a separate section.

This included engagements with:

- nine national government agencies
- district authorities in Hoima and Buliisa
- Kigorobyia Town Council
- government authorities in four subcounties.

Figure 7.5-1 shows the districts, subcounties and villages engaged with during the scoping phase.

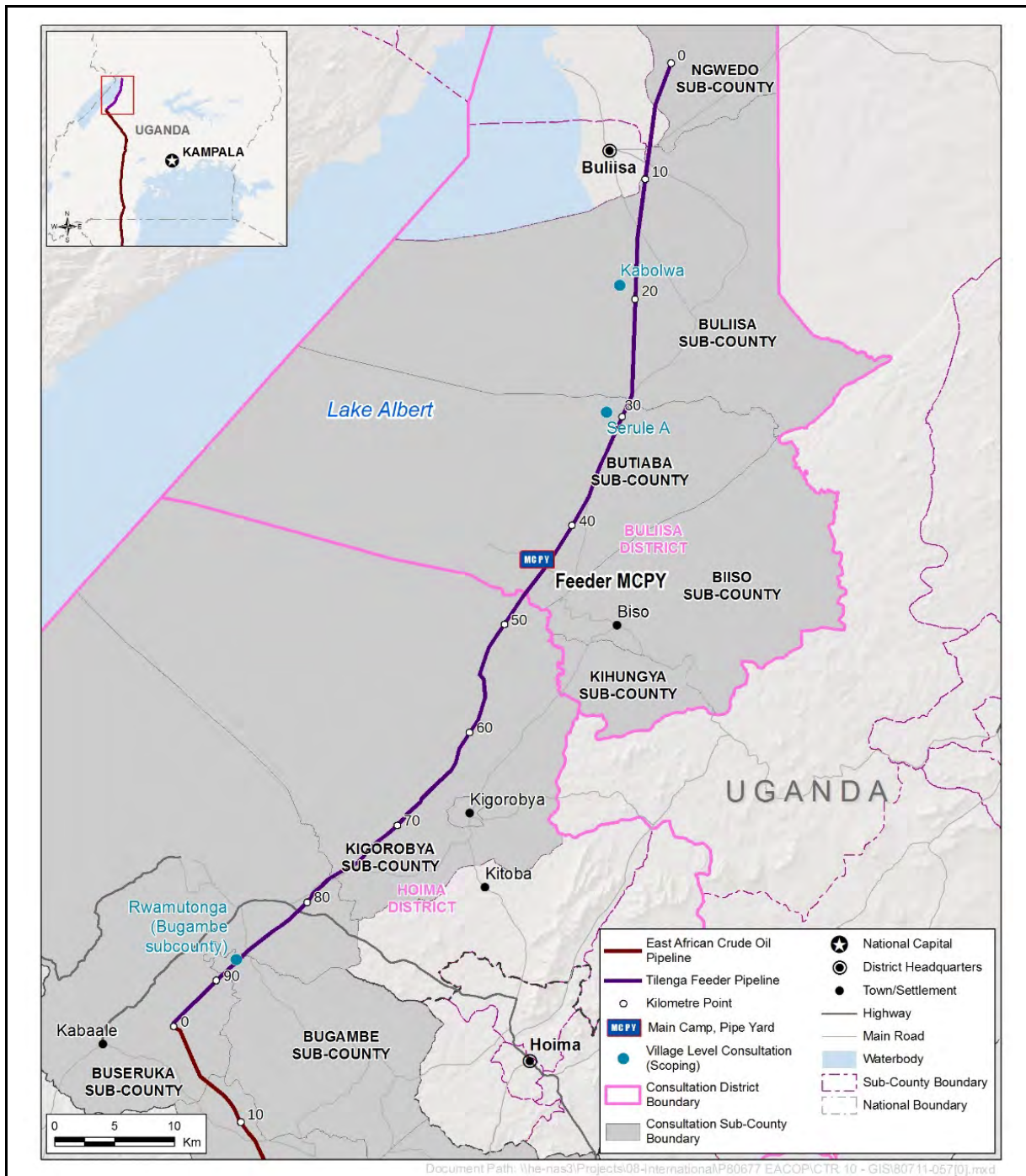


Figure 7.5-1 Districts, Subcounties and Villages Consulted During the Scoping Phase

Arranging the Engagement Activities

For meetings with district, subcounty and national government stakeholders Invitation letters were hand delivered to the stakeholders one week before the proposed meetings. The invitations were accompanied by project information and ESIA information brochures.

A confirmation phone call was made to the contact person for each stakeholder meeting to confirm the event, the time and place a few days before the meeting.

For village meetings the following procedure was followed:

- Radio announcements on local stations in English and local languages (Lugungu, Alur, Runyoro- Rutooro) were made at least ten days before the start of the stakeholder engagements in all project affected areas. These announcements aimed to inform the public about the pipeline and to mobilise the relevant communities to attend the planned meetings. Further to this, the following steps were taken.
- Selected villages, their subcounty and district government officials were visited two weeks before the planned meetings to announce the forthcoming community meetings and to obtain commitment from local council chairperson officials to mobilise the local people to attend.
- A phone call was made to the local council chairperson a week before the proposed village meetings confirming dates and venues.
- Local council chairpersons were contacted a day before each meeting to confirm their assistance with the mobilisation for the meeting.

Engagement Protocol

The protocol adopted for the meetings is outlined below.

- Meetings were led by the ESIA stakeholder engagement team and representatives of the project.
- Meetings were held in relevant local languages or English if appropriate.
- Two background information documents (BID), one outlining the pipeline and one outlining the ESIA, in English and in relevant local languages were distributed to the participants (see Appendix C2 for English version).
- For community assembly meetings, the importance of women participation was emphasised at the start of the meeting (however separate women's meetings were held).
- For community meetings, started with a prayer and opening remarks by the stakeholder appointed chairperson (each meeting appointed its own chairperson) and introductions. Meetings at district, subcounty and national levels started with introductions.
- All stakeholder meetings included a presentation on the project and the ESIA using a presentation at national level and posters (Appendix C2) at district, subcounty and village level. The project representatives introduced the project grievance procedure.
- After the presentation, a question and answer session was held allowing stakeholders to question and discuss the pipeline, the impacts and mitigations.
- During all meetings, the type and status of vulnerable peoples and groups potentially affected by the pipeline was discussed. This served as preparation for further meetings with vulnerable groups during the baseline and impact assessment phase.
- Attendance registers were completed and all questions and responses were recorded and entered in a database. Appendix C4 presents full records of all formal stakeholder meetings.

The results of the scoping phase consultations aided with the development of the list of priority VECs described in Section 6.

Figure 7.5-2 shows a scoping phase stakeholder meeting.



Figure 7.5-2 Stakeholder Meeting in Kihungya Subcounty, Buliisa District

7.5.2 Stakeholder Engagement during the Baseline and Impact Assessment Phase

7.5.2.1 Baseline and Impact Assessment Engagement Objectives

The specific objectives of the baseline and impact assessment phase engagement were to:

- introduce the pipeline and ESIA process to stakeholders identified during the scoping phase engagements and who had not been met
- identify and gain access to baseline data (collect, verify and close data gaps) from stakeholders and
- gather stakeholder feedback on the identification of impacts and development of management and mitigation measures of potential impacts, particularly where stakeholders have a potential role to play in developing and implementing these measures.

7.5.2.2 Baseline and Impact Assessment Engagement Approach

Building on stakeholder engagement conducted during the scoping phase, stakeholder identification continued during the baseline and impact assessment phase. ESIA subject matter experts (social, biodiversity, hydrology and cultural heritage) engaged with national, regional and local level stakeholders as part of their baseline studies. They gathered subject specific data, provided stakeholders

with information about the project and the ESIA and potential impacts and recorded their concerns, suggestions and aspirations.

The engagement approach adopted by the teams included the following:

- International and national level:
Key informant interviews (KIIs) were the predominant engagement tool with national government agencies and officials, businesses, international and national NGOs and academic institutions.
- District and subcounty level:
KIIs and small group interviews (SGIs) were used at this level targeting, district and subcounty government agencies, civil society organisations (CSOs), service providers (e.g., health) and individual experts (e.g., land, livestock, natural resources).
- PAC level:
A sample of PACs with a diversity of socio-economic characteristics were included. The identification of sample PACs was based on the social baseline sampling methodology (see Appendix A10).
PACs were engaged through community meetings, focus group discussions (FGDs), SGIs (to understand different livelihood strategies), KIIs (including business representatives, leaders, natural resource users, religious leaders, teachers and traditional healers) and house hold interviews (HHIs). Focus group guides, which were the mechanism used for recording stakeholder responses in that forum, included questions on aspirations and concerns with regards to the project.

All engagement activities included an element of identifying vulnerable groups and exploring knowledge, perceptions and attitudes toward vulnerable groups. Women only group sessions and interviews were also included to explore gender issues with particular reference to women's perceptions and concerns.

The different methodologies were strategically employed and aimed to identify impacts on vulnerable stakeholders. (e.g., SGI with pastoralists, fishermen, artisanal miners and HHI with the very poor, widows, elderly and people with disabilities).

Meetings

The baseline and impact assessment phase meetings were held between 2 November and 18 December 2017. A total of 703 people participated in 173 meetings. The following meetings were held:

At international and national level:

- Seven KIIs and SGIs with national level organisations, including government agencies;
- One KII with an International NGO (World Vision); and
- Three KIIs with kingdom leaders from the Bunyoro-Kitara Kingdom.

At district and subcounty level:

- 18 KIIs and SGIs with district officials
- two meetings with district health management teams
- two meetings with hospital personnel

- two meetings with subcounty officials to arrange PAC meetings.

At local level:

- 14 FGDs with community leaders (including Parish leaders)
- 14 FGDs with women groups
- Four community assembly meetings
- 64 KIIs and SGIs with community members including local business owners, religious leaders, teachers, traditional healers, fisher folk, crop farmers, pastoralists, artisanal miners, natural resource users and health workers
- 42 HHIs (including vulnerable people).

Appendix C1 lists stakeholders met during the baseline and impact assessment phase.

Figure 7.5-3 shows the districts, counties, subcounties and villages engaged with during the baseline and impact assessment phase.

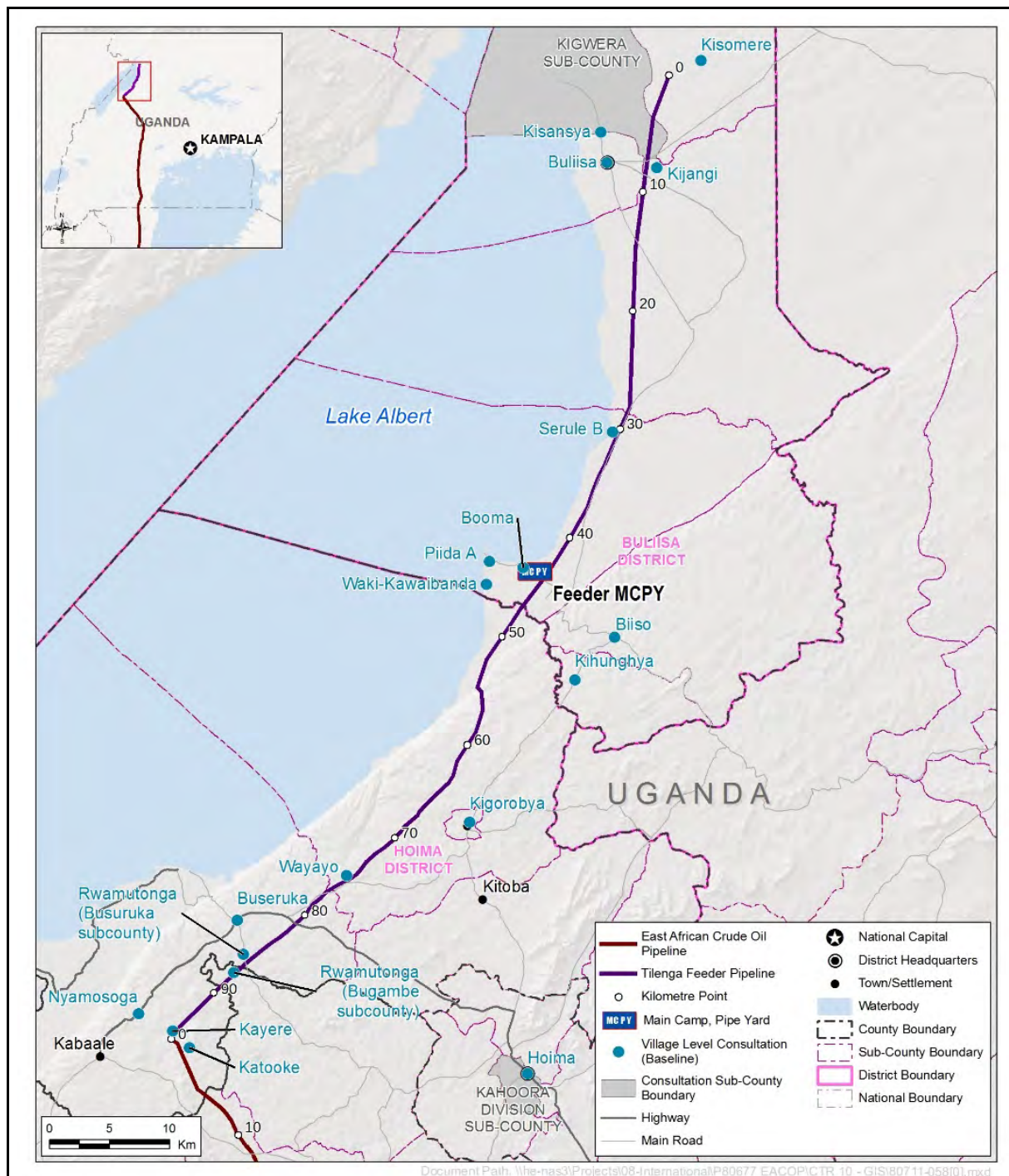


Figure 7.5-3 Districts, Subcounties and Villages Consulted During the Baseline and Impact Assessment Phase

Arranging the Engagement Activities

For meetings with district, subcounty and national government stakeholders, a process similar to the one applied during scoping was used:

- A letter providing an update on the ESIA and stakeholder engagement process was sent by email one week before the proposed meeting. The letters were accompanied by electronic versions of the BID and ESIA information brochures.

- The DED of each district directed the DEMO as the liaison person for the ESIA team.
- regular phone contact was maintained with the DEMOs to arrange the district, and community meetings in terms of time and location of the meetings, and mobilisation of participants.

For meetings at PAC level, the following process was followed:

- Subcounty leaders were contacted by phone and requested to inform community leaders about the proposed meeting.
- The stakeholder engagement team met with the subcounty and PAC leaders and members. The objectives of these meetings were to:
 - explain the pipeline, the ESIA and potential impacts, to provide BIDs and to arrange subsequent meetings with different community groups
 - provide a letter introducing the baseline studies (social and environmental)
- Local council chairpersons were requested to mobilise community groupings for follow up meetings (SGIs, FGDs, KIIs).
- A phone call was made to the village leader at least a day in advance of the to confirm date, time and venue for the interviews and groups discussions.

Engagement Protocol

Community assembly meetings and national level meetings followed the same protocol as during the scoping meetings. BIDs and posters were used and distributed during the meetings.

Other stakeholder engagements (FGDs, SGIs, KIIs and HIIs) were executed in a less formal manner and combined with data collection. These engagements generally started with a short presentation on the project and the ESIA process, followed by a discussion on topics relevant to the livelihood, experience or expertise of the stakeholder, followed by opinions, concerns and suggestions with regards to the project. Appendix C4 presents full records of all formal stakeholder meetings during the baseline and impact assessment phase.

Figure 7.5-4 and Figure 7.5-5 illustrate stakeholder engagement during the baseline and impact assessment phase.



Figure 7.5-4 Stakeholder Engagement Meeting in Serule B, Buliisa District



Figure 7.5-5 Focus Group Discussion with Community Leaders in Biiso, Buliisa District

7.5.3 ESIA Pre-Submission Stakeholder Engagement

7.5.3.1 ESIA Pre-Submission Engagement Objectives

As part of the project's commitment to meaningful engagement with stakeholders in general and impacted communities in particular, the pipeline stakeholder engagement process includes pre-submission stakeholder engagement before finalisation of the ESIA report. The objective of the ESIA pre-submission stakeholder engagement was to consult with all categories of potentially impacted stakeholders on the draft ESIA findings, specifically, the potential impacts and mitigation measures.

Pre-submission engagement served to:

- inform stakeholders of the preliminary results of the impact assessment and mitigation measures to be applied
- inform stakeholders of how their concerns have been considered; and
- receive concerns, comments and recommendations on the impacts and proposed mitigation measures that will be considered and incorporated into the final ESIA report for submission to the regulators.

7.5.3.2 Pre-Submission Engagement Approach

To achieve the pre-submission stakeholder engagement objectives, engagement with key stakeholders was undertaken at

- *District level*
targeting technical and political leaders
- *Subcounty level*
(including town council) targeting technical leaders
- *PAC level*
Targeted efforts were made to extend invitations to women, elderly, youth and people with disabilities or their representatives to participate in the PAC meetings.

The process used to arrange meetings in the scoping phase was again followed.

Meetings

The pre-submission stakeholder meetings were conducted between 6 June and 9 June 2018. A total of 422 people participated in 13 meetings.

The following meetings were held:

- at district level:
 - a meeting with Technical Planning Committees (DTPCs) and with political leaders at Hoima and Buliisa districts (four meetings in total)
- at subcounty level:
 - a meeting with Butiaba subcounty technical leaders
 - a meeting was held with the Kigorobyia Town Council technical leaders
 - a meeting with Bugoigo Environment Protection Association
- at PAC level:
 - eight community assembly meetings.

Appendix C1 lists stakeholders met during the pre-submission meetings.

Figure 7.5-6 shows the districts, subcounties and villages include in the pre-submission meetings.

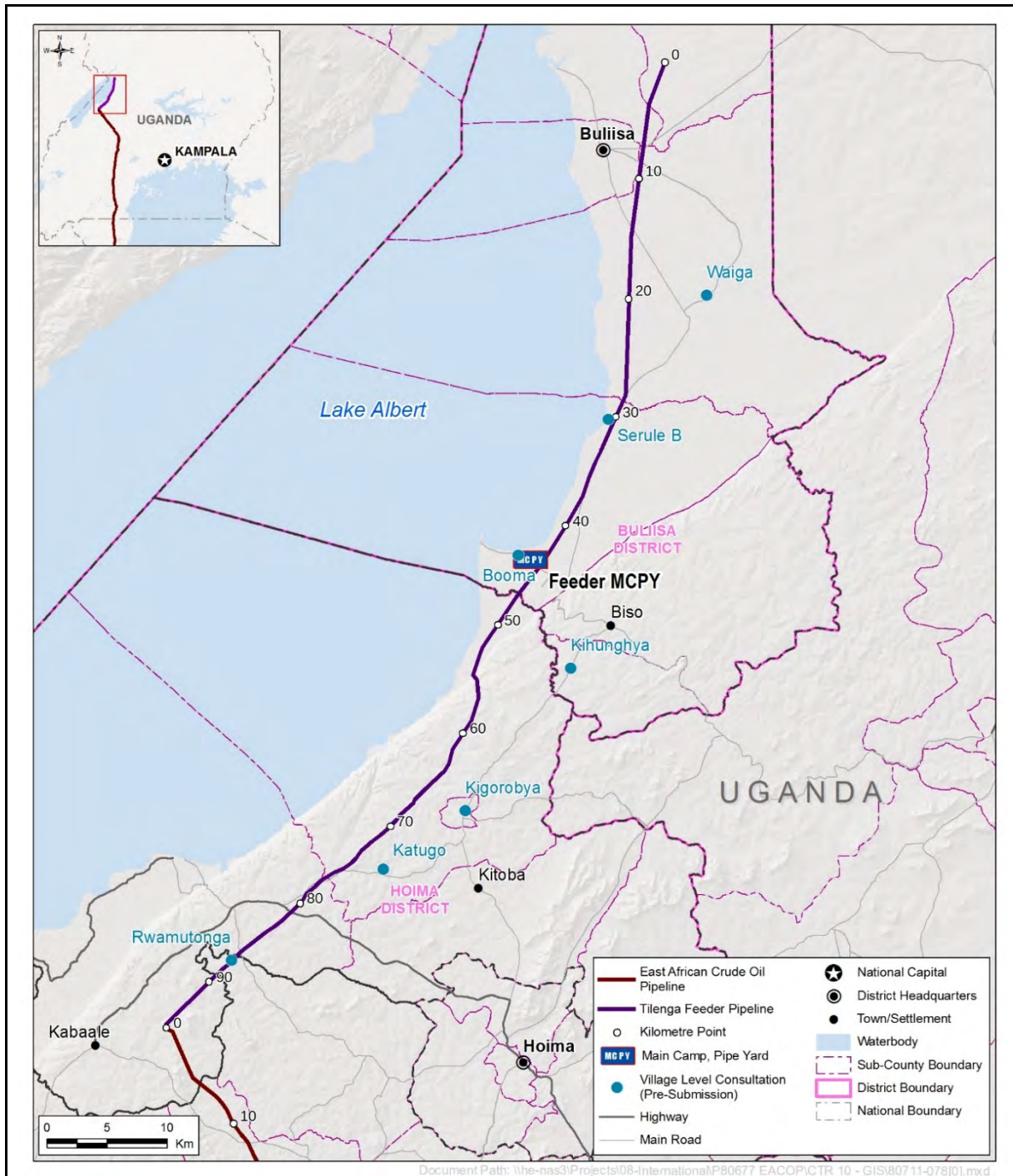


Figure 7.5-6 Districts, Subcounties and Villages Consulted in the Pre-Submission Meetings

Arranging the Engagement Activities

For meetings with district, subcounty and PACs, the following process was followed:

- Letters requesting a meeting were delivered to districts.
- Phone calls were made to local council chairpersons before the village meetings to confirm the meeting dates, times and venues and to request them to mobilise the village residents.

Engagement Protocol

Community meetings followed a similar protocol as during the scoping meetings. Posters and BIDs were used and distributed during the meetings. The project was presented based on the most up to date information and impacts and mitigation measures discussed. This was followed by a question and answer session. Appendix C4 presents full records of all formal stakeholder meetings. Stakeholder comments were considered in the ESIA reporting.

Figure 7.5-7 and Figure 7.5-8 show pre-submission stakeholder meetings



Figure 7.5-7 Community Meeting with Waiga Village, Buliisa District



Figure 7.5-8 Women’s FGD in Kigorobya Trading Centre, Hoima District

7.6 Stakeholder Engagement Results

This section presents the main concerns and questions raised by stakeholders during the scoping phase, the baseline and impact assessment phase and the pre-submission meetings and indicates where these concerns are addressed in the ESIA.

Appendix C3 includes a more comprehensive list of the stakeholder concerns and project responses disaggregated for the scoping phase, baseline and impact assessment phase and the pre-submission meetings and disaggregated per stakeholder engagement group.

Appendix C4 presents full records of all formal stakeholder meetings held in the scoping phase, the baseline and impact assessment phase and during the pre-submission meetings. This does not include the stakeholder comments from the KIIs, FGDs, HHIs and SGIs as these engagements were more informal and are included in the social field data records.

Figure 7.6-1 provides the percentage of comments from stakeholders (all stakeholder groups combined) across the different categories of concern. The figure indicates that during the scoping phase, the majority (34%) of the concerns are about socio-economic and health matters. The majority (35%) of the concerns during the baseline and impact assessment phase related to project information. Concerns about the ESIA and stakeholder engagement were also prevalent during the scoping, baseline and impact assessment phases and the pre-submission meetings.

Figure 7.6-2 shows the results from the FGDs with women and with community leaders at PAC level during the baseline and impact assessment phase. The data is disaggregated into to concerns and aspirations. From the figure it can be seen that:

- women have particularly high expectations with regards to community infrastructure (e.g. provision of clinics and schools)
- both concerns and aspirations with regards to standard of living are relatively high for both community leaders and women, although the aspirations of women are less pronounced
- concerns related to land and property are important for both community leaders and women
- health concerns are important for women
- community leaders have high aspirations with regards to job opportunities.

Sections 7.6.1 to 7.6.4 provide additional information on the concerns, comments and aspirations of the stakeholders and the responses of the project.

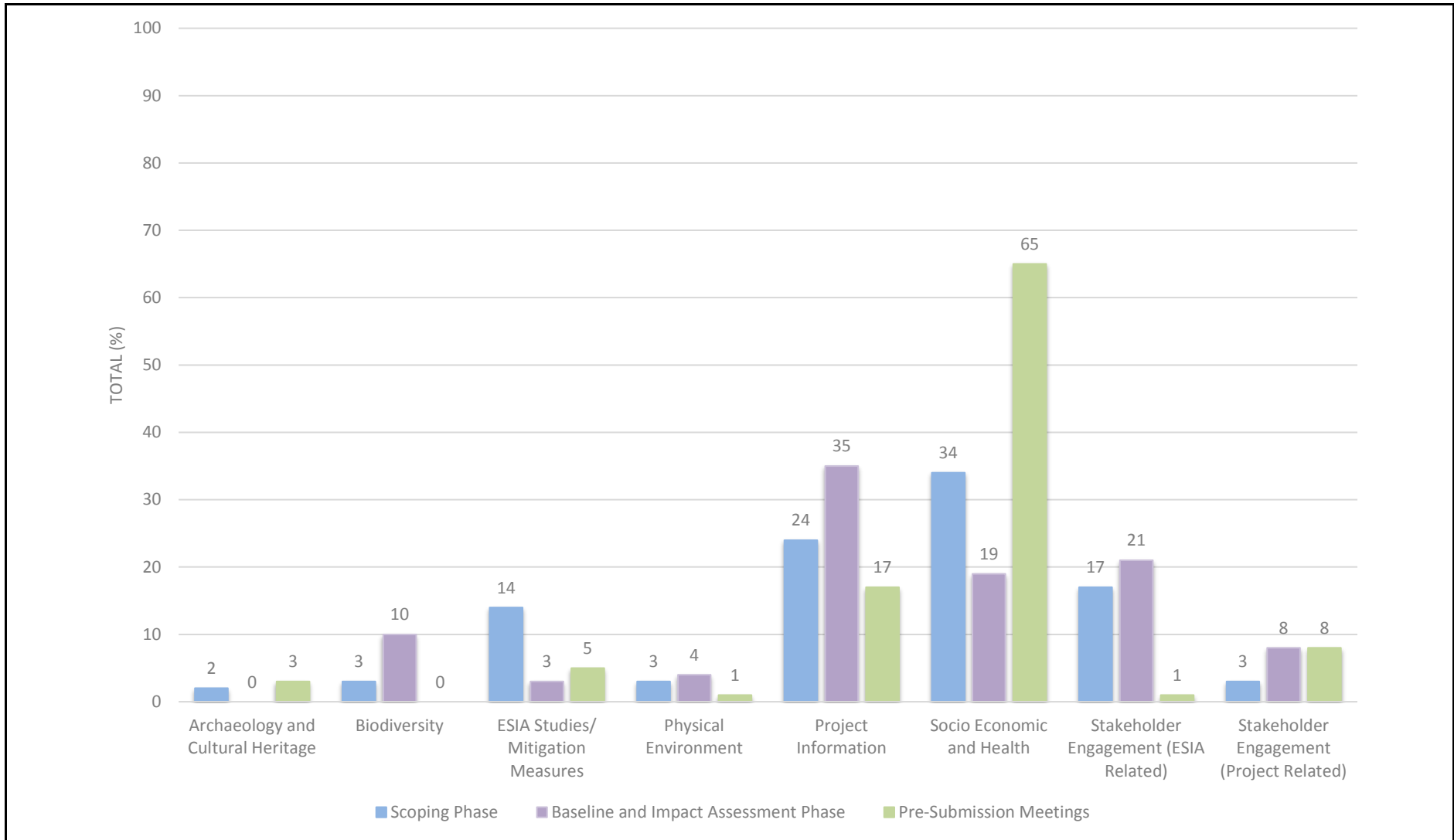


Figure 7.6-1 Grouping of Concerns and Comments by ESIA Phase

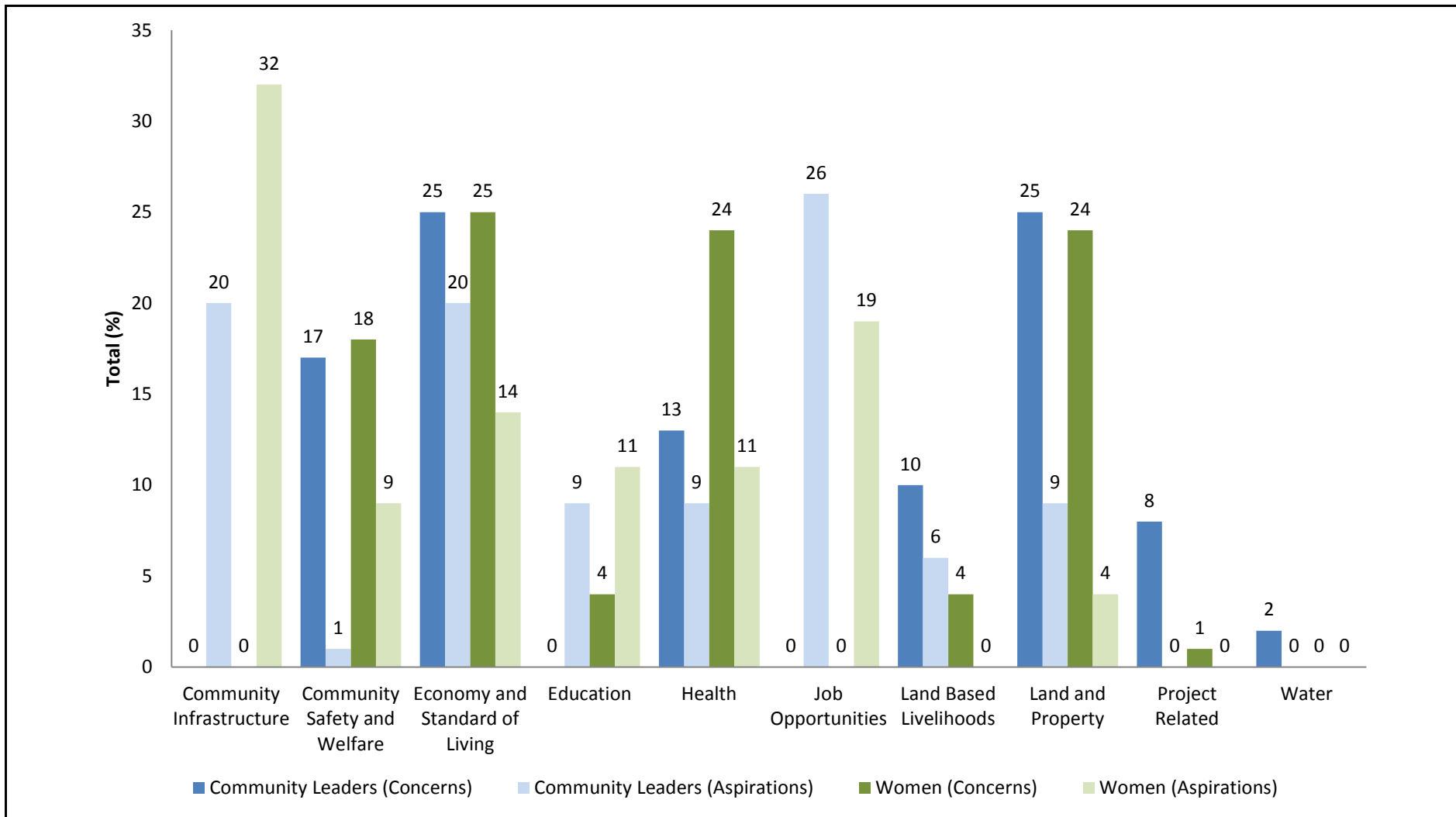


Figure 7.6-2 Grouping of Concerns and Aspirations from Focus Group Discussions during the Baseline and Impact Assessment Phase

7.6.1 Socio-economic and Health

7.6.1.1 Land and Property

Scoping Phase

Concerns Raised

A recurrent concern throughout the engagement for all stakeholder categories was compensation for loss of land, livelihoods and properties.

Stakeholders emphasised the shortage of land in project-affected districts and the difficulty of finding replacement land.

The need to ensure that compensation is provided in a timely manner and project-affected people receive adequate compensation to rebuild their lives was a constant theme throughout the consultations.

The importance of including vulnerable groups, particularly women and children, in all compensation and resettlement-related discussions was emphasised.

District stakeholders expressed confusion about the pipeline right-of-way (RoW) and sought clarity on whether this would be associated with permanent or temporary land take across the width of the RoW.

Responses Provided

Stakeholders were informed that the project will develop a resettlement action plan (RAP), including a livelihood restoration plan, which will be informed by the socio-economic baseline studies. An entitlement framework will be developed to ensure fair compensation while the livelihood restoration plan will ensure that impacts on livelihoods will be mitigated. During the ESIA and resettlement planning phases, there will be ongoing engagement with affected stakeholders, including vulnerable groups, to update them on the plans and receive their input.

It was explained that during construction a temporary 30-m RoW would be required and that there would be a permanent 10-m RoW for operations. This has subsequently updated and 30-m RoW will be acquired permanently. Communities have been informed and will be updated on this change through the ongoing engagement process.

Baseline and Impact Assessment Phase

Concerns Raised

Similar to the scoping phase, all stakeholder categories raised concerns over land acquisition and compensation for loss of land, livelihoods and properties during baseline and impact assessment phase engagement.

Responses Provided

Stakeholder concerns were noted and they were informed that a detailed RAP will be developed and agreed with the relevant Ministry. An entitlement framework will be developed to ensure fair compensation while a livelihood restoration plan will be

developed to ensure that impacts on livelihoods of tenants and land-owners will be mitigated. There will be no forced acquisition of land.

Pre-Submission Meetings

Concerns Raised

While stakeholders were presented with the pipeline description during the pre-submission meetings, they sought more clarification about the 30-m RoW being acquired for the pipeline.

Stakeholders also asked for more clarification on the compensation process, i.e., identity of PACs to be compensated and the compensation payment process. Compensation rates were also a key concern; as were the services of independent valuers to value stakeholders' assets and the handling of the resettlement and relocation process.

Responses Provided

As provided in the ESIA project description (Section 2.3.6), stakeholders were informed that the pipeline corridor will be permanently acquired by the Government of Uganda.

Stakeholders were further informed that the project will provide compensation for losses on the basis of rates validated by the chief government valuer (CGV) and in compliance with national regulations and International Finance Corporation (IFC) performance standards and the Land Acquisition and Resettlement Framework (Appendix J). It was explained that valuation reports are validated by the office of the CGV in liaison with representatives from the district, and that PAPs will be informed by the RAP team on how variations can be handled. Stakeholders were advised that compensation for any losses due to project activities will involve spousal consent.

With regards to resettlement, it was explained that the relocation process will be informed by the RAPs and will be developed in consultation with PAPs. Stakeholders were assured that the RAP team will engage with PAPs throughout the resettlement process.

7.6.1.2 In-Migration and Foreign Workforce

Scoping Phase

Concerns Raised

Concerns were raised at the national and district level meetings on project induced in-migration (PIIM) management in areas close to project construction and operation sites. A common perception was that women and girls could be victimised by construction workers.

Fears regarding construction camps were widespread with the expectation that these may lead to an increase in HIV and AIDS rates, reduce water and electricity availability for the local people, overburden healthcare resources and contribute to family breakdowns.

Responses Provided

Stakeholders were informed that the potential for PIIM and the associated negative impacts will be addressed in the social impact assessment and health impact assessment and mitigation measures developed.

Stakeholders were advised that there will be sensitisation campaigns, camp management plans, and general awareness for workers about the impact that dangerous behaviour can have on local communities.

Any criminal offence will be handled according to Ugandan law and a grievance procedure will be put in place involving CLOs and local leaders to address issues such as misconduct of project workers.

Baseline and Impact Assessment Phase

Concerns Raised

No further concerns were raised during the baseline and impact assessment phase.

Pre-Submission Meetings

Concerns Raised

Although stakeholders were presented with information on the project impact assessment and mitigations, further concerns were raised about the social risks of PIIM, including the breakdown of families due to project workers eloping with spouses. Stakeholders further requested for information on proposed plans to minimise the spread of sexually transmitted diseases such as HIV and AIDS.

The potential increase in crime levels due to PIIM was also a concern among stakeholders, particularly the theft of livestock by project workers.

Responses Provided

It was explained that social impacts have been identified and mitigation measures proposed in the ESIA (Sections 8.17, 8.18 and 8.19) and the project induced in-migration management plan and a community health, safety and security plan will be developed to address these concerns. Measures to minimise such social risks were explained to stakeholders, including the enforcement of labour management plans (LMPs) which aim to minimise interactions between project workers and the local community. Stakeholders were advised that the project will liaise with local leaders to identify and resolve any grievances.

Stakeholders were informed that impacts related to crime have been assessed in the ESIA report (Section 8.19) and mitigation measures proposed. It was explained that the project will liaise with local leaders to ensure that risks related to crime are minimised.

7.6.1.3 Economy and Standard of Living

Scoping Phase

Concerns Raised

All stakeholder categories were interested in the potential benefits of the project for Uganda as well as for local communities near the project. Local benefits were viewed in terms of employment and training opportunities and the procurement of goods and services. Emphasis was placed on the importance of project compliance with national content requirements to ensure that local skills and labour are used wherever possible. Community stakeholders, however, were concerned that it would be difficult to benefit from employment because of the lack of pipeline and facilities construction and operation skills in the local workforce.

Responses Provided

The stakeholder engagement team stated that a national content plan will be developed by the project, compliant with Ugandan requirements, which will include commitments to local procurement, capacity building and employment.

Baseline and Impact Assessment Phase

Concerns Raised

Similar to the scoping phase, stakeholders at community level were concerned about employment opportunities.

Responses Provided

Stakeholders were advised that job opportunities will range from casual, unskilled, semi-skilled to skilled. Local people, including the youth and women, will be prioritised for non-skilled jobs.

Besides direct job opportunities, there will be indirect benefits such as road upgrades.

Pre-Submission Meetings

Concerns Raised

Stakeholders were presented with information related to pipeline economic benefits. However, stakeholders sought further information related to pipeline benefits for the local community and number of people who would be involved in pipeline activities in the short- and long-term.

Responses Provided

Stakeholders were advised that pipeline benefits had been addressed in the ESIA (Section 8.11) and will include job creation (especially during the construction phase), upgrades to, and the establishment of, new infrastructure, technology transfer between international and local companies and increased revenue to the suppliers of pipeline-related goods and services. It was explained that the project will provide training to people during construction phase, which will enhance the skills of persons involved.

7.6.1.4 Community Health and Safety

Scoping Phase

Concerns Raised

All stakeholder categories raised community health and safety concerns. A main concern related to the impact of the heated pipeline on people, animals, soils and crops.

Responses Provided

Stakeholders were informed that the heated pipeline is insulated and will be buried over 1.5 m underground so there would be no impacts arising from heating the pipeline.

Baseline and Impact Assessment Phase

Concerns Raised

Stakeholders at village level asked what measures will be put in place to prevent the spreading of communicable diseases and what the health impacts of the project would be.

Responses Provided

Stakeholders were advised that an occupational health, safety and security management plan and transport and road safety management plan will limit interaction between construction workers and communities, and health impacts would be monitored.

A community health, safety and security plan will also be developed.

Pre-Submission Meetings

Concerns Raised

Although PACs were presented with information on the ESIA related to community health and safety, further questions were raised regarding the community benefit from the pipeline in relation to healthcare, questioning whether there is any plan to equip health centres in PACs with drugs and better facilities.

Further concerns were also raised about the impact of the pipeline on community health with stakeholders seeking clarification on the likely risks of fire and the potential emission of toxic elements that may be harmful to the community.

Responses Provided

Stakeholders were advised that impacts and mitigations related to potential pipeline impacts on social infrastructure were described in the ESIA (Section 8.17) and the project will also develop a social investment strategy that will define the kinds of projects it will support, consistent with local development plans, local needs and company policy. It was explained that the project will work in partnership with local authorities, PACs and local organisations in the implementation of any community development projects. Stakeholders were informed that the upgrade of health facilities is the responsibility of the Government of Uganda.

It was further explained that the pipeline will be buried and designed to manage potential risks of natural disasters as described in the project description (Section 2.2; Project Design). It was emphasised that the selected pipeline materials are safe and that leakages are rare. Stakeholders were also advised that the pipeline will have an extensive monitoring and control system to detect abnormal situations. With regards to emissions, stakeholders were informed that the impacts on air quality have been evaluated in a section of the ESIA report and mitigation measures have been proposed.

7.6.2 Physical Environment

Scoping Phase

Concerns Raised

Concerns were raised about potential pipeline impacts on climate change during the construction and operational phases

Responses Provided

The stakeholder engagement team explained that the engineering team will collaborate with the ESIA team to assess project impacts on air and climate change and identify mitigation measures that may be required; and will ensure compliance with applicable emission standards.

Baseline and Impact Assessment Phase

Concerns Raised

No concerns were raised by stakeholders during the baseline and impact assessment phase.

Pre-Submission Meetings

Concerns Raised

While stakeholders were presented with information on environmental impacts and mitigations as detailed in the ESIA, further information was sought as to whether the study has assessed impacts related to vegetation cover. Concerns were also raised about the impacts of hydrotesting on the water table given that large quantities of water will be required.

Responses Provided

It was explained that impacts and mitigations on the physical environment are described in the ESIA (Sections 8.2, 8.3 and 8.4) and impacts and mitigation on groundwater due to project activities have been evaluated in Section 8.7 of the ESIA.

Landscape

Stakeholders were shown illustrations of typical project infrastructure and their responses recorded. The responses suggest that stakeholders did not perceive proposed project infrastructure as negative visual intrusions in the landscape.

7.6.3 Biodiversity

Scoping Phase

Concerns Raised

Stakeholders raised concerns about the impact of the pipeline on Lake Albert fisheries and animal and plant biodiversity in the project area.

Impact on ecosystems during construction of the pipeline was raised mostly in national consultations.

Impacts, particularly during the construction phase, on sensitive ecosystems such as forests or wetlands that are habitats for several animal species were a concern.

Concerns were also raised regarding connectivity to protected areas and potential impacts on endemic species.

Responses Provided

Stakeholders were informed that biodiversity studies and an ecosystem services study will be undertaken to assess project impacts on aquatic and terrestrial animals and plants, the extent to which humans depend on these resources and that mitigation measures will be developed where impacts are identified.

Baseline and Impact Assessment Phase

Concerns Raised

There was concern that ecosystems providing interconnectivity for migratory species would be affected.

Responses Provided

Stakeholders were informed that the selection of the pipeline route included consideration to avoid environmental and social sensitivities (see Section 5 of this ESIA) and that the pipeline will be constructed along existing infrastructure corridors where feasible.

Pre-Submission Meetings

Concerns Raised

No further concerns were raised by stakeholders during the pre-submission phase.

7.6.4 Pipeline and ESIA-Related Matters (including ESIA Stakeholder Engagement)

Scoping Phase

Concerns Raised

Stakeholders raised several matters during the scoping phase. These included questions about the ESIA schedule, the approval process for the scoping report, definition of the AOI and the grievance procedure. Recommendations were made by stakeholders on disaster preparedness, involvement of the Chief of Defence, the OPM (Office of Prime Minister) and the Chamber of Mines.

Stakeholders also requested information on pipeline design and pipeline routing.

Recommendations were made with regards to communication channels with local communities, new stakeholders to include in the next round of consultations, and the protocol for meetings, particularly about per diem payments for meeting attendance.

Responses Provided

Responses from the stakeholder engagement team included information on the envisaged ESIA submission, the process regarding approval of the scoping report, women participating in the ESIA process and audits to be undertaken on the efficacy of the grievance procedure.

Feedback was also provided on pipeline design such as pipeline routing, pipeline insulation and markers, oil spill contingency and emergency response planning as well as security planning and the grievance procedure. The recommendations by stakeholders were noted for consideration.

The stakeholder engagement team provided project background information documentation, which includes information on stakeholder communication. The stakeholder engagement planning for the next phases was revised to integrate recommendations received.

Baseline and Impact Assessment Phase

Concerns Raised

Concerns raised during the baseline phase included concerns over the security of the pipeline, during the operation phase.

Responses Provided

The stakeholder engagement team informed the stakeholders that a security assessment would be conducted.

Pre-Submission Meetings

Concerns Raised

Stakeholders sought clarification on the impact assessment, questioning the mitigation measures that will be put in place in the event of a disaster such as bursting of the pipeline or a fire outbreak.

Responses Provided

It was explained that mitigation measures relating to such risks are included in the ESIA report (Section 9). It was explained to stakeholders that the project will have an emergency preparedness and response plan (EPRP) that will address all potential risks and mitigation measures.

7.7 Grievance Procedure

The project established a nonjudicial project grievance procedure to ensure any complaint raised by a stakeholder is registered and handled properly to guarantee

its resolution. The grievance procedure is compliant with the United Nations Guiding Principles on Business and Human Rights effectiveness criteria for project level grievance procedures.

The grievance procedure describes the process available to stakeholders for lodging a grievance during pre-construction, construction and project operations.

The grievance procedure is readily accessible to all stakeholders at no cost and without retribution. The procedure does not impede access to judicial or administrative remedies.

The project's grievance procedure has been presented to stakeholders during each consultation phase and is managed by community liaison officers (CLOs).

The grievance management process requires the following steps by the project:

- receive
- register
- investigate
- response.

Figure 7.7-1 outlines the grievance management procedure.

Stakeholders are provided with several methods of communication to report a grievance to ensure that the grievance procedure is inclusive and culturally appropriate. – verbally, in an e-mail or via post. In any case, a grievance form will be filled with the help of CLOs and signed by the complainant and his witness.

Any grievance is registered, reviewed and responded to. A project CLO will follow up and ensure the different timings for the different steps of resolution are respected.

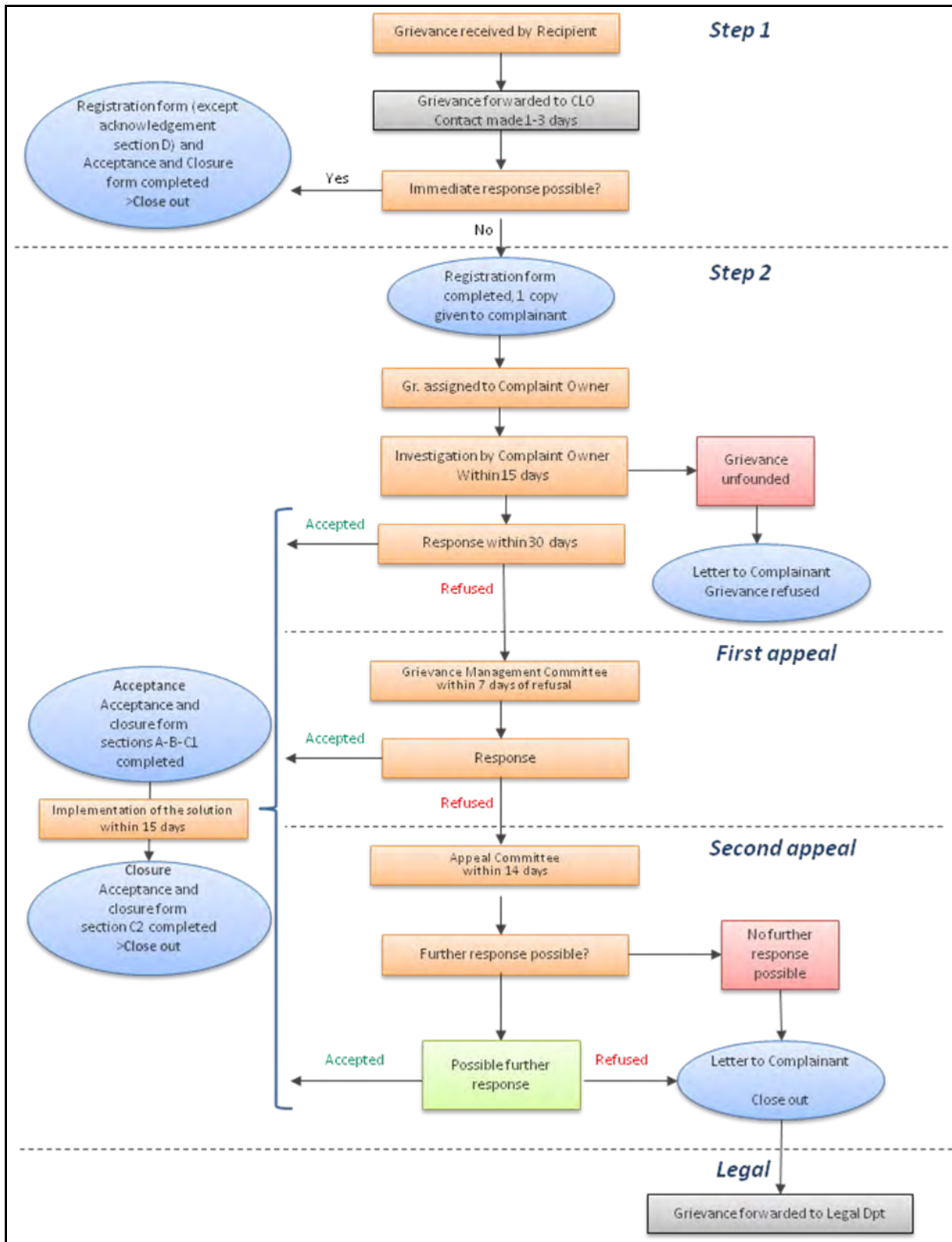


Figure 7.7-1 Project Grievance Procedure

7.8 Government Environmental Impact Statement (EIS) Disclosure

The developer will submit the EIS to the Executive Director of NEMA in accordance with Regulation 17 of the National Environment EIA Regulations, 1998.

As part of the review process, the Executive Director will transmit the EIS to a lead agency for comments on the EIS within thirty working days.

Within ten days of receiving the comments from the lead agency, the Executive Director will invite the general public to make written comments on the EIS, including comments from persons specifically affected by the project.

Thereafter, the Executive Director will consider the EIS and all the comments received and determine whether a public hearing be held in accordance with Regulation 22 of the Environment Impact Assessment Regulation, 1998 under section 107 of the National Environmental Act Cap 153.

The public hearing will be presided over by a suitably qualified person known as a presiding officer appointed by the lead agency in consultation with the Executive Director. The date and venue of the public hearing will be advertised through the mass media, so as to bring it to the attention of persons most likely to be affected by the project.

Any interested party who has requested to make formal presentations can make presentations following the initial presentation by the developer in accordance with the EIA Public Hearings Guidelines 1999. The developer will also have a chance to respond to the questions raised in the hearing.

On the conclusion of the public hearing, the presiding officer will make a report of the views presented at the public hearing and make factual findings to the lead agency and the Executive Director within thirty days from the day on which the public hearing was concluded.

Thereafter, The Executive Director makes a decision about the project taking into account the whole review process. The Director may:

- (a) approve the project or part thereof;
- (b) require that the project be redesigned including directing that different technology or an alternative site be chosen;
- (c) refer back the project or part thereof to the developer where there is insufficient information for further study or submission of additional information as may be required to enable the Executive Director to make a decision; or
- (d) reject the project.

A decision of the Executive Director under this regulation will be communicated to the developer within fourteen days of the decision.

7.9 Ongoing Stakeholder Engagement

7.9.1 Post-ESIA Submission Stakeholder Engagement

Post-submission stakeholder engagement, based on the disclosure of the ESIA report, will be undertaken after the ESIA report has been submitted to the regulators.

The engagements will include key national government authorities, NGOs and government stakeholders in the two districts and all the subcounties traversed by the pipeline, as well as community leaders (women and men) of a sample of PACs will be gathered at subcounty and village level for engagement.

Engagement activities by the project stakeholder engagement team will also continue and will be adjusted to reflect evolving project activities, stakeholder preferences and concerns over the life of the project. The project will also seek to build partnerships with NGOs, CSOs and communities to support the development and implementation of practical impact management strategies. The engagement strategy will also include targeted engagement with identified vulnerable stakeholders (such as, pastoralists, fishing communities, and communities with a significant presence of landless community members) or their representatives (such as mothers, health workers or school teachers to represent the perspectives of children as appropriate).

Meetings will be arranged as per the agreed protocol during the previous phases. Information materials on the ESIA outcomes in English and local languages where appropriate (such as information brochures, nontechnical summaries of the ESIA, posters and presentations) will be used for the meetings.

As described in some of the cumulative impact assessment parts of the ESIA (Section 8), liaison will be undertaken with the developers of third-party projects where there could be a significant cumulative impact.

The results of these engagements will be documented in a stakeholder engagement report.

Engagement activities will be adjusted to reflect evolving pipeline activities, stakeholder preferences and concerns over the life of the pipeline. The project will also seek to build partnerships with NGOs, CSOs and communities to support the development and implementation of practical impact management strategies ranging from benefit sharing to monitoring.

The grievance procedure will continue to provide opportunities for stakeholders and project-affected communities to express grievances about pipeline activities.

A stakeholder engagement monitoring and evaluation programme will be developed to ensure efficient and effective stakeholder engagement.

7.9.2 Community Engagement

Before the start of the construction phase of the pipeline, local community offices will be established at appropriate locations along the pipeline route to allow stakeholders direct access to community liaison officers.

Regular meetings with PAC representatives will be held before and when construction is active in their area to:

- communicate construction schedules and activities to those affected
- manage expectations and reduce conflicts
- receive and manage grievances
- define matters of land take, user rights and access
- ensure participation in project implementation, as needed
- communicate on project's health, safety, and security procedures and requirements concerning the communities.

Additional meetings will be held when the need arises (e.g., discontent, conflicts, incidents).

Regular meetings will be held with the district council technical teams, including health management teams to discuss potential health and other issues related to development of the pipeline and to proactively plan and coordinate the development and implementation of community programmes.

The project will reinforce its engagement with vulnerable groups. The objective is to ensure inclusive engagement reaches all vulnerable groups and to adapt engagement techniques to facilitate that objective, such as through using small group meetings, focus groups, women field team members, providing additional translation and selecting accessible locations for engagement activities.

A community liaison log (meeting minutes) will be maintained detailing the content of all meetings with PACs.

7.9.3 Community Awareness Programmes

Community awareness programmes will be developed and implemented to raise awareness of PACs to matters including but not limited to:

- employment and training opportunities. The project will develop a campaign focused on providing realistic community expectations with regards to livelihood restoration options and employment opportunities. This is to avoid people making livelihood decisions based on incorrect information.
- risks associated with construction activities and construction camps and measures to protect health, safety and security
- financial literacy
- gender-based violence and alcohol abuse
- road safety awareness
- importance of staying at school (in schools)
- children's rights
- HIV/STD (for communities and project drivers).