

## **Stakeholder Engagement Plan & Grievance Mechanism**

14<sup>th</sup> January 2021

CEPF Grant 110576

Fondation Biotopie

### ***Mainstreaming Opportunities for Operationalizing business contributions to Nature in the Mano River Union countries***

**Guinea, Liberia, and Cote D'Ivoire**

## Grant Summary

**Grantee organization:** Fondation d'entreprise Biotope

**Grant title:** Mainstreaming Opportunities for Operationalizing business contributions to Nature in the Mano River Union countries

**Grant acronym:** MOON

**Grant number:** 110576

**Grant amount (US dollars):** \$343,000.00

**Proposed dates of grant:** from 1 February 2021 through 30 June 2022.

**Countries or territories of implementation:** Guinea, Liberia and Cote D'Ivoire

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## Purpose of the Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) will provide the structure for all interactions between the Project and its stakeholders. The SEP may evolve during the implementation of the Project according to the respective implications of each stakeholder.

The objectives of the SEP are to:

- Ensure the long-term success of the project and project activities through the active support of all stakeholders.
- Facilitate dissemination of project outputs and guidance materials on mainstreaming.
- Ensure that all stakeholders have a good understanding of the project and what it is trying to achieve so that they can make informed decisions with respect to activities supported by the project.
- Conduct training to ensure that project stakeholders are equipped with practical knowledge on implementing the project outputs (particularly conservation agreement blueprints and timesheets).
- Ensure that stakeholders have access to an effective grievance mechanism.
- Ensure women and other vulnerable groups are given the necessary attention in all of the above.

## Project rationale

The Guinean Forests Biodiversity Hotspot covers 621,705 km<sup>2</sup> and supports extraordinary biological diversity, high levels of endemism and species richness, and a number of Key Biodiversity Areas (KBAs). Approximately 85% of the natural forest in this ecoregion has been lost to human activities, with almost all remaining forest modified by past human disturbance. Liberia retains large forest blocks, whereas high levels of fragmentation have occurred in Côte d'Ivoire and Ghana, and to a lesser extent in Guinea. The most intact areas of forest occur within protected areas (PAs) and forest reserves (FRs), however much of their management is currently poor or non-existent due to a lack of resources. Within this hotspot, the Project will focus on the landscapes indicated in the map below.



The number of extractive (mining), energy (dams), agribusiness (plantations) and associated infrastructure (roads, rail, power-lines, ports, etc.) projects across the Guinean Forests Hotspot is expanding exponentially and these projects are destroying and fragmenting vast areas of habitat. Such projects have significant primary and/or indirect impacts and also frequently result in large influxes of people, which can further increase hunting pressure and habitat destruction. These developments also have cumulative impacts whereby, for example, the impacts resulting from the interaction of mining with other activities and industries, such as transport infrastructure and large-scale agriculture, are larger than those of each sector taken independently.

The impacts from the expansion of mining, hydropower, agriculture and infrastructure result, in part, from the lack of an enabling environment for best practice. This includes Environmental and Social Impact Assessments (ESIA) that do not meet international standards, insufficient or – more often – poorly-enforced legislation, a lack of government and civil society organizations' (CSO) capacity to review ESIA's and monitor project compliance. In addition, there is limited exposures to innovative models that have led to no net loss and even net gain elsewhere in Africa, either through biodiversity offsets and/or

conservation partnerships, such as for example public-private-partnerships (PPPs) and public-private-community-partnerships (PPCPs) with corporates.

A widely used framework to manage project impacts in order to meet specific objectives (for example biodiversity, social or carbon related) is the mitigation hierarchy. This project will organise its approach to follow this framework, which prioritises the avoidance of impacts, followed by the minimisation of their scale or intensity, restoration of disturbed habitats, and finally exploring options for biodiversity offsets and other conservation measures for impacts that have not been addressed by the preceding stages. Enhancing the capacity for successfully implementing this final step will be a key goal of the project, leveraging best practice from across Africa and elsewhere.

The long-term governance and management aspects of offsetting and additional conservation gains are an important and growing hurdle, now that service providers have picked up on loss – gain accounting and offset design and sizing. The project will highlight the roles and grow the capacity of government partners, NGOs and other third-party implementation partners, which includes long term financing structures, project management / governance for the set-up of offsets, monitoring of progress, including interim targets. Another hurdle is that most NGOs and taxonomic specialists lack understanding of the mitigation hierarchy and no-net-loss / net-gain approaches and their roles in achieving these goals. There is a limited pool of partners for companies to draw upon, which generates tensions and misunderstanding with local partners who could but do not benefit from private sector procurement, and limits opportunities to raise awareness within regional and national communities of practice.

While several initiatives in the region, such as the COMBO project, have had significant impact in improving legislation (for example, the national biodiversity mitigation and offsetting strategy in Guinea) and raising capacity, implementation on the ground remains weak. The limited uptake and practical implementation of best practice at the project and landscape levels, coupled with increasing investment in large-scale infrastructure must be urgently addressed with the creation and support of better legislation, regional capacity to enforce and enable policies, strategic partnerships that benefit all the stakeholders to deliver, and working examples of PPPs and PPCPs that can showcase how business can contribute to conservation and restoration in and around KBAs.

This project builds on past successes in the region, global best practice and a new collaboration of key regional actors in order to: create an enabling environment for the application of the mitigation hierarchy to project development in the region; develop practical and user friendly guidelines (in French and English), especially for private-sector financing of conservation actions through PPPs/PPCPs; enhance capacity to support international best practice; and lay the groundwork for and enable lasting strategic partnerships between Government institutions, CSOs/non-profit organizations, community associations and the business sector.

Specifically, the project will:

- Contribute to creating an enabling environment for mainstreaming, in particular through the preparation of sectorial guidelines (at least 1 sector per country chosen following a scoping and review process), the training of taxonomic specialists on best practice for private sector management of biodiversity to ensure local expertise and service providers are available, and working with national and regional platforms, including the CN-CIBE, a platform created to oversee the rollout of Guinea's national mitigation and offsetting strategy.
- Create a risk and opportunity map with the location of private-sector operations that have the potential to anchor conservation and livelihood projects, as well as to collaborate on landscape-scale restoration initiatives linked to their regulatory restoration requirements as well as to their

sustainability strategies, also linking to opportunities to support and develop nature-based solutions.

- Broker and showcase partnerships for conservation and restoration in 3 corridors using a structured process to identify opportunities, guidance for engagement with the private sector and blueprints for conservation agreements with the private sector (as PPPs or PPCPs), for which training will be provided to local NGOs and government partners.

## **Social context and risks**

Potential social issues are concentrated in the development and brokering of partnerships for conservation between local communities, other actors, and private-sector partners. Asymmetries in economic and political power between parties to these partnerships will need to be managed carefully.

The principal livelihood activities in much of the project area is small-scale agriculture (largely subsistence, rice, coffee and oil palm), hunting, and animal husbandry. This is far from meeting social needs however. For example while 98% of Ziama’s households in Guinea practice subsistence or smallholder agriculture, 85% do not produce sufficient yield to feed their households. Remittances from family members working in urban centres, sometimes abroad, play an essential role in rural household livelihoods.

In Guinea, although in practice customary property rights remain dominant in rural areas, they are generally limited to use rights and do not permit commercial activities. Policy initiatives to formalise customary rights have had limited traction and, significantly, the state remains the property owner for all unregistered land (i.e. virtually all rural land) prior to its registration. Likewise, there is evidence of increased commodification of land, driven by population growth, liberalisation of the national economy and the importation of different land practices by returnee migrants.

Complex customary land tenure systems combined with population growth and waves of immigration to and emigration from the area – including as prompted by intermittent periods of civil unrest over the last 30 years – have led to changes in how people assess, use, and manage land, and in some cases, has contributed to land divisions that leave some residents functionally landless.

Unlike Guinea, Liberia’s forestry sector has a fairly robust and conducive legal framework, which recognizes customary rights of local communities to access and manage forests for their benefit.

## Project Stakeholders

Key stakeholders for the Project are listed below:

- **NGOs:** Conservation Society of Sierra Leone, Wildlife Conservation Society, Forest Trends, Missouri and Kew Botanical Gardens, Wild Chim Foundation, GRET.
- **Cross-sector platforms** including: CN-CIBE and REB in Guinea, a proposed platform to be funded by FFEM
- **Ongoing projects:** COMBO's 2<sup>nd</sup> Phase (funded by AFD/FFEM), Biotope and FFI engagement with extractives sector including Simandou project, SFMG, Arcelor-Mittal, Eni, Sogiupah
- **Financial institutions** including: Agence Française de Développement, African Development Bank, World Bank and International Finance Corporation
- **Conservation Donors** including: AFD, CEPF, the EU
- **Public conservation agencies** including Office Ivoirien des Parcs et Reserves, Department of Forest Conservation, Forestry Development Authority in Guinea, Office guinéen des parcs et réserve
- **Public agencies in charge of environmental impact assessments and permitting.**, including Environmental Protection Agency, Liberia, Guinean Office of Environmental Audit and Compliance (BGACE), the Ivorian national agency for the environment (ANDE)
- **Local governments** (Governors, Prefects and Mayors concerned, Heads of Rural Communes, etc.) and **traditional leaders** (Paramount chiefs, Councils of Elders, Lineage Chiefs, and Religious Leaders, etc.)
- **Communities** in and around Mt Nimba Strict Nature Reserve, Gola, Ziama, and other project KBAs, which can be variously represented by community associations, Clan and village leaders (chiefs), and elders; with farmers; miners; hunters; bushmeat traders representing important subgroups
- **Women, youth** (represented by youth leaders, women leaders) **and other vulnerable groups**, including households with no or limited land holdings that may be dependent on access to natural resources from natural ecosystems
- **Sub-grantees and project implementation partners** such as Fauna and Flora International, Conservation Capital, among others.

## Summary of Previous Stakeholder Engagement Activities:

As this is a new initiative, specific stakeholder engagement has not been carried out to date. The project partners, however, have worked in the region for several years.

In Liberia, FFI has been worked with government and the private sector for a number of years. FFI is on several relevant technical working groups, including the Artisanal and Small-Scale Mining Sector Working Group (ASMSWG), Species Working Group Liberia (SWGL), Safeguard Working Group (SWG) and Environmental Sector Working group (ESWG). FFI also has a long-term agreement with the Forestry Development Authority (FDA) and works closely with the Environmental Protection Agency (EPA) – both institutions sit on all the working groups listed above. Although we have not discussed this specific project at the various working groups or with our main partners FDA and EPA, we have had extensive discussions

with the FDA about the need to develop a park neighbour policy outlining guidelines for operating around protected areas which fits very well with the activities proposed under the CEPF MOON project.

FFI is also aware of and in discussion with a GIZ-funded initiative in Liberia, GIZ Regional Resource Governance Programme, which is working on governance and sustainability issues in the artisanal mining sector. At a recent training session on mainstreaming conducted by FFI on behalf of CEPF, the potential for joint mainstreaming activities were discussed with companies including Arcelor Mittal, Sogiupah (palm oil), and Firestone (rubber, manufacturing).

In developing this project and the related AFD proposal for an extension to COMBO in Guinée (now approved), and an FFEM proposal for Guinée forestière, project partners have engaged with a range of stakeholders including private sector businesses from the mining sector (SMFG, Simfer SA, Winning Consortium Simandou, AML), forestry (Forêt Forte) and agri-business (SOGUIPAH, ImpactAgri), Government departments (MEEF) and agencies (CFZ, CEGENS, OGUIPAR). Several of these stakeholders are represented in the Comité National pour la Compensation des Impacts sur la Biodiversité et les Ecosystèmes (CN-CIBE) which received technical assistance from Biotope as part of the COMBO project.

In Côte d'Ivoire, Biotope has worked with the Ivorian Office of Parks and Reserves [OIPR], and Ivoire Hydro Energy, a local hydropower development company, has shown preliminary interest in engaging with the project.

In addition to the above, the project partners are active members of the international conservation community in the region, with regular interactions with complementary initiatives led by e.g. Wildlife Conservation Society, Forest Trends, Missouri and Kew Botanical Gardens, Wild Chimp Foundation, GRET.

## **Stakeholder engagement activities**

The project will engage in the following activities activities:

- Identify key individuals or groups of individuals who effectively represent local stakeholders;
- Use a diversity of consultation methods to clarify, in order to better manage them, the interests, fears, motivations, and expectations of the different stakeholders;
- Specify the roles and limits of each stakeholder in the communication process;
- Develop a support program to enable these groups to engage in open dialogue, with a focus on training around blueprints and termsheets for PPCPs;
- Develop an appropriate Communication Plan to initiate dialogue among all stakeholders, which should continue to evolve as the project progresses;
- Develop and implement an effective grievance mechanism.

## **Consultation methods**

Broadly, much of the stakeholder engagement will be conducted through the following methods:

- Discussions at established meetings of stakeholders such as the CN-CIBE and REB in Guinea.
- Focus group discussions with specific groups such as financial institutions, sectorial meetings of mining firms or private sector actors in the Mount Nimba landscape

- Informal discussions with community members living and conducting livelihood activities in and around the project focal areas, including key informant interviews (e.g. interviews with artisanal miners, hunters etc.)
- Formal and informal discussions with community members to discuss their interest in PPCPs: stakeholders will be met during closed or public consultations and their interests and concerns regarding PPCPs will be assessed. These consultations will further identify the topics of the project as perceived by local stakeholders, and technical and environmental aspects will be addressed.
- Training workshops (see below): Local NGOs and other stakeholders will be trained to enable them to implement the conservation agreements.

## **Communication plan**

Local communication allows to actively contribute to the Stakeholder Engagement Plan and to a global transparency policy. It is essential to establish an effective communication network, which should be based on existing information channels within the communities, with the possibility of strengthening them without replacing them. The credibility and effectiveness of this communication network will ensure that all project communities.

A wide range of media is available in all Guinean communities: rural radio stations, government officials and traditional authorities. However, the effectiveness of these channels can be evaluated and improved in order to obtain accurate information.

Information that will be disseminated through the project include the following:

- Sectoral guidelines on achieving No Net Loss on biodiversity for government, there will be at least 3 of these technical documents, and the particular sectors will be chosen following the review of the legal and policy framework and due-diligence on opportunities in CEPF corridors. These are technical documents which will be disseminated to a pre-selected group of practitioners within the NGO and government sectors.
- Blueprints and termsheets for conservation agreements for local NGOs operating in project priority areas that will enable them to establish a PPP or PPCP. Projects will be ranked and at least one project / business will be designed in each of the four landscapes.

## **Training events**

The following training workshops will be held:

- Two workshops to train NGOs to implement the Conservation Agreement blueprints that the project will produce.
- Two workshops for regional species specialists on critical habitat assessment standards such as IFC PS6, in coordination with local networks and groups such regional IUCN species specialist groups.

Workshops will be held in English in Liberia and in French in Cote D'Ivoire and it is likely that the workshops will be held back-to-back, ie. one session in Liberia on Conservation Agreements and on IFC PS6, and one in Cote D'Ivoire covering the same topics.



## **Promotion of gender equality and other vulnerable groups**

Biotope's Foundation is bound by French anti-discrimination laws and will ensure its subgrantees and service providers are held to the same standard concerning women, sexual orientations and gender identity, ethnic origins and political opinions or religious beliefs.

The project will ensure that women, the young and the least favoured and most vulnerable groups are taken into account in the design of project activities that concern them. Specifically, the project will ensure these groups are represented in stakeholder consultations and training events, and report on this representation in technical reports submitted to CEPF.

The project will also include specific clauses concerning these groups in the blueprints and termsheets for conservation agreements and partnerships with the private sector, to ensure they obtain an equitable share of the benefits that local communities will derive from these partnerships and do not suffer disproportionately from conservation commitments made by communities.

## **Grievance mechanism**

All projects that trigger a safeguard must provide local communities and other relevant stakeholders with a means to raise a grievance with the grantee, the relevant Regional Implementation Team, the CEPF Secretariat or the World Bank. Although the project is unlikely to have any direct negative social or environmental impacts, a grievance mechanism will be developed and implemented.

This grievance mechanism will include, at a minimum, the following elements:

- Email and telephone contact information for the grantee organization and their representative on the ground: Biotope in Guinea and Côte d'Ivoire, FFI in Liberia.
- Email and telephone contact information for the CEPF Regional Implementation Team.
- The email of the CEPF Executive Director: [cepfexecutive@conservation.org](mailto:cepfexecutive@conservation.org)
- Email and telephone contact information for the local World Bank office.
- A statement describing how you will inform stakeholders of the objectives of the project and the existence of the grievance mechanism (e.g., posters, signboards, public notices, public announcements, use of local languages).
- The following text will be included, exactly, in any grievance mechanism: "We will share all grievances – and a proposed response – with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance directly to the CEPF Executive Director at [cepfexecutive@conservation.org](mailto:cepfexecutive@conservation.org) or by surface mail. If the claimant is not satisfied with the response from the CEPF Executive Director, they may submit the grievance to the World Bank at the local World Bank office."

Following the guidance above, the project will provide local communities and other interested stakeholders with the means by which they may raise a grievance with Fondation Biotope, the CEPF Regional Implementation Team, the CEPF Secretariat or the World Bank. Relevant local communities will be informed of the objectives of the project and the existence of a grievance mechanism. The email address, telephone number, and physical address of Fondation Biotope, the CEPF Regional Implementation Team, and the CEPF Grant Director will be made publicly available at any public meetings that are held.

We will share all grievances – and a proposed response with the Regional Implementation Team and the CEPF Grant Director within 15 days. If the claimant is not satisfied following the response, they may submit the grievance directly to the CEPF Executive Director at [cepfexecutive@conservation.org](mailto:cepfexecutive@conservation.org) or by surface mail. If the claimant is not satisfied with the response from the CEPF Executive Director, they may submit the grievance to the World Bank at the local World Bank office.

## **Timetable**

The timetable for engagement activities is still being worked out, and much will have to do with how the Covid pandemic plays out over the next few months. Detailed planning will be conducted in the first and second quarters of 2021 for this reason.

## **Resources and Responsibilities**

The Biotope's Foundation and the national project leads at Biotope (Guinea, Côte d'Ivoire) or FFI (Liberia) will be responsible for the implementation of this SEP and the grievance mechanism, and ensuring that the goals of stakeholder engagement activities are met.

In particular, all project staff involved in stakeholder engagement related to discussions with the private sector in existing forums such as CN-CIBE and REB, as well as with species specialists and Government representatives in the context the training workshops, will be responsible for complying with the SEP.

Given the way in which stakeholder engagement is integrated within all project activities, there are no resources allocated specifically to stakeholder engagement but are included as part of all budget lines, for example in the delivery of the training workshops for species specialists.

## **Monitoring and Reporting**

It is not expected that there will be any stakeholder and third-party involvement in the monitoring of project impacts.