

Africa Mini-grid Programme in Comoros

Stakeholder Engagement Plan

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Acronyms and Abbreviations

AMP	Africa Mini-grid Programme
DGEME	General Department of Energy, Mining and Water
ESMF	Environmental and Social Management Framework
ESPs	Electricity Service Providers
IOC	Indian Ocean Commission
KM	Knowledge Management
M&E	Monitoring and Evaluation
PPG	Project Preparation Grant
QA	Quality Assurance
SEP	Stakeholder Engagement Plan
SES	Social and Environmental Safeguards
UNDP	United Nations Development Programme

Stakeholder Engagement Plan

1 Introduction

The purpose of developing a Stakeholder Engagement Plan (SEP) for the Africa Mini-grid Programme (AMP) national project in Comoros (hereinafter referred to as the ‘AMP Comoros’ or ‘the project’) is to support the identification of key stakeholders and undertake the consultations required throughout the project cycle, i.e. project design during the Project Preparation Grant (PPG) stage, and project implementation during its 4 years’ duration. The development and implementation of the SEP is also part of the UNDP Social and Environmental Safeguards (SES) requirements. Hence, the presented SEP will be reviewed and updated during the course of the social and environmental assessment processes required for the development of the project’s Environmental and Social Management Framework (ESMF).

1.1 Project description

Comoros is one of Africa’s smallest countries (archipelago) but with one of the highest electrification rates. However, the effective access to electricity for end-users (residential, commercial and social) is significantly lower due to various reasons (incl. frequent load shedding, high transmission losses, etc.). This challenging energy situation hampers the socioeconomic development of an already fragile country, especially in rural areas with vulnerable populations.

Thus, the Comoros national child project, as part of the Africa Minigrids Program, seeks to develop a low-carbon minigrid market in Comoros to support access to sustainable, reliable, affordable and cleaner electricity in rural areas in Comoros, contributing to durable improved livelihoods and inclusive poverty alleviation while reducing GHG emissions. The project rationale is underpinned by a novel approach to de-risk private sector and community investments in the market for rural decentralized renewable energy access. This will be achieved through (i) a suitable minigrid delivery model and appropriate policies and regulations for a conducive low-carbon minigrid investments’ environment, (ii) innovative business models with strengthened private sector and communities participation, (iii) innovative suitable supply and demand financing solutions, and (iv) increased awareness, knowledge sharing and network opportunities.

1.2 Project location

Activities under AMP Comoros will be implemented at national level, covering the three islands of Grande Comore (where the capital city of Moroni is located), Mohéli and Anjouan.

The exact location for the 3 pilot projects under AMP Comoros has been identified during the PPG phase and can be found under Annex 3 – Project Map and Geospatial Coordinates of project sites. Somaliland consists of around 50 districts, with only 50% of the districts having mini-grid systems. The 3 pilot sites have been selected based on [objective criteria](#) validated by both DGEME and the national utilities SONELEC.

1.3 Potential social and environmental issues

The SESP has identified the following principles and project-level standards as relevant to the project:

- Overarching Principle 1: Leave No One Behind¹
- Programming Principle 2: Human Rights
- Programming Principle 3: Gender Equality and Women’s Empowerment
- Programming Principle 4: Sustainability and Resilience²
- Programming Principle 5: Accountability
- Project- level Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management
- Project- level Standard 2: Climate Change and Disaster Risk
- Project- level Standard 3: Community Health, Safety and Security
- Project- level Standard 4: Cultural Heritage
- Project- level Standard 5: Displacement and Resettlement
- Project- level Standard 6: Indigenous Peoples
- Project- level Standard 7: Labour and Working Conditions
- Project- level Standard 8: Pollution Prevention and Resource Efficiency

Detailed analysis of the above is presented in the project’s SESP and ESMF (Annexes 6 and 10 of the Project Document).

2 National Regulations and International Requirements

At the time of developing this SEP, there were no legally binding policies or explicit regulations in Comoros identified as pertaining to stakeholder engagement as a legal requirement. Nevertheless, the PPG consultations indicate that almost all government parties conduct specific stakeholders' consultations and engagement activities as part of their projects. The parties expressed their willingness to become actively involved in the SEP implementation for AMP Comoros and offered to play the lead role in the coordination between stakeholders in the minigrid sector throughout the project duration.

In addition, the project will adhere to the relevant international obligations on public consultation and disclosure requirements related to the social and environmental assessment process, established by the Guidance Note of the UNDP Social and Environmental Standards (SES) for Stakeholder Engagement. By preparing this SEP, the project also meets the requirements of the GEF's Environmental and Social Safeguards Policy regarding stakeholder engagement.

3 Stakeholders' Identification

As part of the PPG development process, the project team identified several groups of stakeholders. A list of contacts is available [here](#).

3.1 State and local government authorities, national utilities, i.e. public sector entities

- DGEME - General Department of Energy, Mining and Water (Direction Générale de l'Énergie, des Mines et de l'Eau)
- SONELEC, national power utilities
- Ministry of Agriculture, Fisheries and Environment
- Ministry of Health, Solidarity, Social Protection and Gender Promotion
- Ministry of National Education, Higher Education and Scientific Research
- Ministry of Youth, Employment, Labor, Vocational Training and Integration, Sports, Arts and Culture
- General National Planning Commission
- Gender Commission
- Customs Department
- ANADEN – National Digital Promotion Agency
- ANACEP – National Project Design & Implementation Agency
- Local Governments (LGs)

3.2 Private sector associations and companies

- 1) Private sector ESPs (incl. for minigrids) in Comoros
 - Kamar Solaire
 - Nétisse
 - All Fam Trade
 - Service Interelect
 - APB-Energy
 - ADC Énergie
 - Ecotech
- 2) International minigrid developers and operators already present in Comoros
 - InnoVent
 - VIGOR
- 3) Private sector parties
 - Associations
 - Union of Chambers of Commerce, Industry and Agriculture (UCCIA)
 - Employer's associations:
 - MODEC
 - Nouvelle OPACO
 - Group of RE companies – not really formalized yet (see Component 2)

3.3 Development partners with mini-grid and renewable energy projects in Comoros

- European Union (EU)
- African Development Bank (AfDB)
- World Bank (WB)
- Indian Ocean Commission (IOC)
- Abu Dhabi Fund

3.4 Local communities

Local communities of relevance to the project can be categorized into two groups: communities in pilot locations and communities in non-pilot locations. Representatives of the 3 pilot projects have been identified (local authorities, community association, women farmers association, etc.). Both groups will be further studied during the feasibility studies and GIS analysis to be conducted during project implementation.

3.5 Additional groups to be further defined during implementation

- Direct beneficiaries
 - Academics, educational institutions and vocational training centers, such as:
 - Comoros University
 - IUT des Sciences
 - CFIP of Djomani (vocational training center)
 - RE Training Center in Mohéli (not active – benefited from IOC funding and training of trainers)
 - Financial institutions and small investors:
 - Sanduk
 - MECK
 - BDC
 - BIC
 - Foreign providers
- Indirect beneficiaries
 - Industry groups (agriculture, fisheries, manufacturing)
 - Non-governmental Organization (NGOs) and Civil Society Organizations working on relevant projects and initiatives
 - PANF, an international organization to promote women entrepreneurship
 - Girls and Tech is an NGO aiming at generating new synergies to succeed in the digital transition and empower women and youth through digital technology.
 - Junior International Chamber of Comoros, is part of a large international network of Junior International Chambers, focusing on empowering and training young leaders across all sectors.
 - Shawiri-scoops is a group of multi-disciplinary individuals providing organic waste solutions (especially biodigestors). They have ongoing projects on biodigesters with GEF/UNDP Small Grants Programme on implementing biodigesters in 2 pilots sites of the AMP Comoros project – one in Wallah II on the island of Mohéli and a future one around Bandassamlini (Grande Comore island) in an organic farm close to the pilot project.
 - ADESCO Wallah II is a community association that is aiming at improving its community's livelihoods while protecting the environment. It is collaborating with Shawiri-scoops to install a biodigester of 12m3 in the local guesthouse.
 - Women Farmers Association of Bandasamlini is an association to promote women farmers in the agricultural basin of Grande Comore.
 - Women's Platform for Sustainable Development and Food Security (Plateforme Femmes Développement Durable et Sécurité Alimentaire - PFDDSA) promoting women's critical role in effectively contributing to sustainable development and food security. The platform is part of a regional platform for the Indian Ocean under the impulse of the Indian Ocean Commission
 - Etc.

- Other groups of beneficiaries and affected persons
 - Workers unions
 - Women
 - Youth
 - Children
 - Disabled population
 - Human rights activists
 - Land rights activists
 - Minority and vulnerable groups

4 Stakeholder Consultation and Engagement during PPG Development

As part of the PPG development, and in addition to the desk review and data collection exercise, the PPG team composed of National and International Consultants identified key stakeholders and engaged with them in a series of in-person and online meetings. The purpose of these meetings was to discuss the project objective, the suitability of the proposed strategy to the present needs of the stakeholder in particular and Comoros in general, its challenges and potential solutions, and its alignment with national plans and ongoing market development. The discussions also aimed to identify the gaps which AMP can work on to fill, especially in the presence of several projects targeting energy access and renewable energy development financed by development partners other than UNDP.

Despite COVID-19 pandemic, the PPG team Lead managed to perform a field mission in January 2021 to meet with national stakeholders in-person.

The following consultation and bilateral were conducted online and in-person during the period from August 2020 to February 2021:

- 1) PPG Inception Workshops with key stakeholders in each of the 3 islands
- 2) Field visits in the 3 islands, including a pre-selection of potential pilot sites
- 3) Meetings with representatives of all different types of stakeholders as stated above
- 4) A preliminary energy demand assessment survey on a sample of beneficiaries in the 3 selected pilot sites with the support of the DGEME and SONELEC, using open-source tool [KoBoToolBox](#)
- 5) PPG Validation Workshop in Moroni

The dissemination of project information during PPG consultations and workshops was key. As such a project brochure along with presentations for the inception and validation workshops respectively were developed (all in French). Initial comments and feedback from participants in the meetings and workshops were summarized in the PPG Inception Report (issued in October 2020). The comments and recommendations from stakeholders and the UNDP review team shaped the updated project strategy which has been presented to stakeholders in January 2021 to obtain final comments on the design and validate the overall project strategy before submission to GEFSEC.

Type of information disclosed along the PPG phase is as follows:

Table 1 - Stakeholder engagement during project development

Interaction type	Type of information disclosed	Location and dates	Individuals, groups and/or organizations consulted	Key issues discussed and concerns raised	Responses to issues raised	Process to provide feedback to stakeholders
Inception Workshop	Introduction to the scope of AMP program and national project, priorities, next steps (stakeholder consultations etc.)	online (PPG team Lead) & face to face: <ul style="list-style-type: none"> 8 September 2020 in Fomboni, Mohéli 10 September 2020 in Mutsamudu, Anjouan 16 September 2020 in Moroni, Grande Comore 	All types of stakeholders were represented (49 participants), except for donor and development partners who were not able to join – see list of attendees in the annex	Interactive sessions focusing on (i) innovative minigrid business models based on specific productive use identified by the participants (specific value chains – commercial and social); and (ii) on levers (project components 1,3 and 4) supporting these innovative business model and the market scale-up. The approach to gender and social and environmental safeguards was shared with stakeholders.	Relevant value chains integrated in the ProDoc, in the field visits and stakeholder consultations	Stakeholder interview process initiated for individual inputs (incl. for donors and technical & financial partners who did not attend the inception workshops).
Stakeholder interviews	Obtaining input from stakeholders regarding priorities and needs, as well as challenges to overcome, to shape the project design.	Conducted online and face to face between September 2020 and January 2021; including via focus groups	All the ones listed above	<ul style="list-style-type: none"> Community based models and their capacities Purchasing power of residential customers Scaling-up potential of the 	Incorporated into the Project Document and concrete solutions proposed.	Validation workshop and documentation (in French) circulated for comment : results framework and activities, budget

Interaction type	Type of information disclosed	Location and dates	Individuals, groups and/or organizations consulted	Key issues discussed and concerns raised	Responses to issues raised	Process to provide feedback to stakeholders
				<p>minigrid market in Comoros due to its small size</p> <ul style="list-style-type: none"> ○ Sustainability post-project 		per component and type of funding source (GEF/UNDP grant and other donors), project brochure
Field visits: stakeholder consultations and observations	Informal consultation to enquire about needs, challenges, interest and affordability.	October 2020	Conversations with local authorities, associations, community members, etc.	Discussions confirmed interest and urgent need for access to an available, reliable and affordable energy. Existing challenges with limited road access and absence of electricity were raised. No other social or environmental issues received spontaneous mention.	Incorporated into the Project Document and concrete solutions proposed.	Community members will be actively engaged in more comprehensive consultation as part of the project development and implementation.
Preliminary demand assessment survey on the 3 selected pilot sites	Questionnaire on beneficiaries, activities, needs, access to energy, access to credit, purchasing power, innovation, etc.	December 2020 – January 2021	129 individuals surveyed by 6 surveyors	Large gap of purchasing power between the sites; 12.15 only of surveyed individuals have access to credit; payment preferences (prepaid, payment for a service), limited knowledge of mobile money (72% do not know about it0	Incorporated into the Project Document and concrete solutions proposed	Community members will be actively engaged in more comprehensive consultation as part of the project development and implementation.
Sharing of project information with workshop invitation	Project brochure, result framework up to activities level,	January 2021	Invitations across all stakeholder categories	N.A.	N.A.	N.A.

Interaction type	Type of information disclosed	Location and dates	Individuals, groups and/or organizations consulted	Key issues discussed and concerns raised	Responses to issues raised	Process to provide feedback to stakeholders
	preliminary budget allocated per component and funding source (GEF/UNDP and others) and for preparation					
Validation Workshop	Overview of project design	19 January 2021 online with a small group face to face at Golden Tulip, Moroni with UNDP CO and PPG team Lead	Over 40 participants from all stakeholder categories	<ul style="list-style-type: none"> ○ Project sustainability ○ Missing baseline data on gender and on energy in Comoros ○ High turnover of government agents leads to loss of knowledge after capacity building efforts ○ Conducting workshops in the field rather than in Moroni ○ Training of local trainers ○ Gender mainstreaming ○ All stakeholders have a role to play 	Project Document amended to reflect these concerns	Validation report with response matrix and amended Project Document

Key issues discussed and key concerns raised, responses to issues raised, including any commitments or follow-up actions and process undertaken for documenting these activities and reporting back to stakeholders.

5 SEP Development: Strategy for Stakeholder Engagement during Project Implementation

5.1 Purpose and objectives

Unlike grid-connected power plants, the successful operation of mini-grids requires continuous collaboration between operators and end-users. In the design of the pilots under AMP Comoros and according to Article 19 of the Electricity Code, it is key to understand the needs and priorities of the communities in which the minigrids will be located, to obtain the necessary local support and ensure sustainability and longevity of the intervention. ESPs are integrated in the process from the very beginning to ensure a trusted and robust relationship with the communities that will contract them to have access to an available, reliable, affordable and greener energy.

Furthermore, the enhancement of the commercial viability of minigrids depends on the level of information flow between stakeholders from the private sector and decision makers in the public sector. This flow will guarantee that the decisions made are well-informed and constitute the best use of resources to serve the best interest of the country and beneficiaries. The flow will also guarantee that investors, developers and ESPs, as well as communities, are actively engaged in the development of regulations governing the energy sector before they become legally binding and are given the opportunity to utilize their technical expertise in the formulation of national plans and laws aiming to increase energy access rates and elevate the living conditions for populations in the rural areas. The National Dialogue Platform under Component 1 in close collaboration with all other Components are hence key.

Hence, this SEP is developed to ensure tripartite engagement of public entities, private sector actors, and representatives of beneficiaries/communities in all stages of pilot development and overall project implementation.

5.2 Engagement methods and communication media

Notwithstanding the COVID-19 restrictions and social distancing recommendations, different types of engagement mediums are possible in Comoros. The following list presents the main engagement media to be utilized by the project team during implementation to ensure continuous engagement and active participation of stakeholders.

1) In-person meetings:

- Consultation workshops: These workshops will have a pre-structured agenda which will be designed to present a specific result/report and discuss with stakeholders the best way forward. These workshops will also be an opportunity to gain consensus from stakeholders on a specific action plan prior to proceeding with implementation. Therefore, stakeholder consultation meetings and workshops are included in the project design as part of the main activities to be carried out by the consultants in charge of each output.
- Interviews and focus group: These will be conducted with different groups of indirect beneficiaries, with special attention to ESPs and NGOs, to overcome their generally low participation capacity and ensure that their input is integrated in the different stages of project implementation. The Project Manager will be responsible for ensuring that these interviews and focus groups have been conducted by the responsible consultants, as appropriate.
- Community based consultations: These consultations will focus on the pilot locations to identify and discuss stakeholder concerns within the community environment, but will also extend to neighboring villages and communities. The SES Officer will be responsible for conducting these consultations on a regular basis and reporting to the Project Manager and M&E Officer per the project's ESMF.

2) Written communication:

- WhatsApp: The use of WhatsApp is widely accepted and time for reaction and action is relatively quick.
- Emails: While e-mail communication is widely used in Comoros, the reactivity and action taken based on emails is relatively low. Emails will be used as the main tool for organizing meetings, i.e. sending invitations to participants, sending the meeting minutes after the meeting, etc. To ensure invitations are well received and accepted, calling each of the participant is often a prerequisite for their attendance in Comoros – as a reminder.
- Letters: Being the formal method for communication and conveying messages between public parties, letters will be requested by the project team and provided by the relevant authority, as appropriate.

- Survey forms: Several activities under the project implementation strategy constitute undertaking a needs assessment or other types of analyses, with some involving undertaking a survey to collect information. The responsibility for the surveys is that of the consultant undertaking the analysis. However, the SES Officer will be responsible for supporting the project consultants with the sampling process and surveying procedure to the results are as representative and inclusive as possible. A thorough follow-up per WhatsApp and calls will be necessary for surveys sent online as well as the ones not filled in during a face-to-face meeting.
 - Project brochures and manuals to present the results of specific studies and outcomes of certain activities.
- 3) Online meetings and phone calls: Virtual communication is sometimes preferred since it is quicker and easier compared with email and letters, and a viable alternative to in-person meetings. Online applications and telecommunication tools will be used throughout project implementation to facilitate the work and ensure the project team has easy access to stakeholders, and vice versa.

Although the mode of communication may vary according to task and participant, yet all consultations and engagement activities will be undertaken with the goal of ensuring full participation of relevant stakeholders, whereby all participants will be provided sufficient notice to prepare well and provide input for the project and its successful implementation. Moreover, AMP Comoros will also use all possible opportunity, i.e. workshops, meetings, trainings and awareness events, to promote diversity and gender balance. Balanced representation of relevant stakeholders will be ensured by reaching out to both men and women and different groups through appropriate communication means and encouraging their participation, noting the most socially and culturally acceptable language and method of communication for each group of stakeholders.

In addition:

- To account for the safeguards, the research will include socio-economic-environmental aspects (not only socio-economic), including on relevant studies such as DREI analysis, GIS study, interconnection potential (Output 1.4.), opportunities to boost economic and social activities through electricity access and productive (Output 2.1.), the 3 minigrid pilot sites (Output 2.2.), the general market intelligence study on minigrids targeting public officials and finance community in Comoros (Output 3.3.) and Outcome 4 regarding knowledge sharing, awareness raising etc.
- A participatory process as undertaken during PPG will enable establishing an inclusive manner that ensures stakeholder diversity (i.e. gender-balance, environmental and social activist groups representing the wide variety of the stakeholder groups presented in the stakeholder table) is included in all outputs of the project, especially the National Dialogue Platform (Output 1.1.), capacity building and awareness raising efforts (Outputs 1.5., 1.6., 2.3., 2.4., 3.4., 4.2., 4.3. 4.5), the development, management and maintenance of the minigrids of the 3 pilots (Output 2.2), etc.
- The joint decision-making to account for the safeguards will be via a partnership undertaken with local communities, NGOs, or other project stakeholders, especially via the National Dialogue Platform (Output 1.1), the Quality Assurance and Monitoring Framework (Output 4.1.), as well as the Project Monitoring (Output 4.8.) and Evaluations (Output 4.9).

5.3 Public Disclosure of Information (PDI)

Project-affected, marginalized, and disadvantaged stakeholders at all 3 selected pilot sites will be further during project implementation, including persons with disabilities and other disadvantaged groups as per the list of stakeholder groups provided above. For each group, the following assessments will be conducted as part of the stakeholder engagement, taking into account their involvement in each project component:

- Identify limitations for understanding project information and participating in consultation process (e.g., language differences, lack of transportation, accessibility of venues, disability)
- Develop measures to support and accommodate engagement (e.g., provide information in accessible formats, choose convenient locations for consultations, ensure venues are accessible, provide transportation to meetings, change time of meetings to accommodate needs, provide facilitation and explain complex issues and terminology, provide support workers for assisting participants with disabilities, provide simultaneous interpretation (including sign language).

At national level, methods to receive feedback and to ensure ongoing communication with stakeholders (outside of a formal consultation meeting) will be developed as part of the project's knowledge management and dissemination plans (as part of the implementation of Component 4).

5.4 Diversity, inclusion and gender-balance

The inclusion of women and other relevant groups will be made possible through enhancing opportunities, improving access to resources, making their voice heard and respect for their rights. The process begins with appropriate identification of these groups and/or representatives and engaging them through the various project activities using the following two approaches:

- 1) Conducting context specific gender analysis using gender and mini-grid analysis framework and develop participatory action plans at community level at locations where pilot projects and productive use will be supported. The analysis will be sensitive in scheduling community level meetings selecting appropriate time and location, give deliberate attention to the participation of diverse groups to listen to their voice and apply appropriate language that fit to the audience level. It will also explore the existing status of the different groups their roles, responsibilities, opportunities, and deprivations and seek participatory solutions in their engagement as consumers and actors at various levels of the mini grid value chain.
- 2) At every stage of the project implementation the project team will make specific effort to make sure opportunities are created and accessed by women and other vulnerable groups while implementing institutional level capacity building trainings, policy level discussions, access to education and financial opportunities. The project team will also track progresses through routine monitoring and supervision based on a checklist of indicators which are formulated at the inception phase of the project. In addition, the project will communicate the steps for appealing grievance in and subsequent redress mechanisms in case complaints arise from this group. All in all, maximum efforts will be exerted to make communications between beneficiaries which includes women and other relevant groups with the project to be built in spirit of mutual understanding, positive relationship, and partnership for successful implementation of the intervention.

6 SEP Implementation: Resources, Responsibilities and Timeline

Responsibilities

As part of the management arrangement, the project will hire a SES Officer to oversee the implementation of the ESMF and continuous review and update of associating studies, including the Stakeholder Engagement Plan (SEP) and the Gender Action Plan (GAP). Hence, the SES Officer will be the responsible person for SEP implementation, collaborating with the project's M&E Officer and reporting directly to the Project Manager (PM).

Before each activity starts, the SES Officer will have approved the detailed plans ensuring the responsibilities. For example, Component 1, outcome 1, indicator 6 reflects that the stakeholder engagement plan will be done via the online tools that will be designed through a "consultative process involving key stakeholders (i.e. relevant ministries, local authorities, rural populations, private sector, media, etc.)". Similarly, each component/outcome/indicator will reflect the appropriate inclusiveness as the projects advances.

Resources

The fees for the SES Officer are accounted for in the project's budget. Moreover, the project budget for each component allocates an amount for expenditures on training, workshops, conferences, etc. Expenses under this category are expensed to the UNDP-GEF under an independent budget code (75700) and include allocation of funds to ensure proper consultation of stakeholders from the different groups throughout project implementation. Based on the work requirement during implementation, the project may hire a qualified Community Liaison Officer to undertake all or portions of the stakeholder engagement activities. This may include, where necessary, community facilitators/assistants who are able to work in local languages (where relevant, ideally from the same ethnic group/culture).

Timeline

The timeline for stakeholder consultation on specific project activities will follow the overall work plan for the project. Additional consultations will occur as part of conducting the mid-term review and terminal evaluation missions. That said,

the SES Officer shall develop a schedule for regular visits and calls with different groups of stakeholders to ensure continuous engagement from project start to end.

Before each activity start, the SES Officer will have approved the detailed plans ensuring the timeline provides a schedule outlining dates/periodicity and locations where various stakeholder engagement activities, including consultation, disclosure, and partnerships will take place and the date by which such activities will be undertaken to the extent possible. Similarly, each component/outcome/indicator will reflect the appropriate inclusiveness as the projects advances.

The following table presents the preliminary SEP developed during PPG development, noting that:

- 1) During Year 1 of project implementation, further assessments will be conducted, providing more details on the project stakeholders and allowing further consultations to take place, i.e. prior to the on-site installation works. The SES Officer will be working in close collaboration with technical consultants in charge of specific activities and studies.
- 2) The assessment of the participation capacity of the various stakeholder groups influenced the project design and strategy. For example, a new output has been introduced to help establish and capacitate an energy/minigrid industry associations to enhance and promote active participation by the private sector in minigrid planning and development. Similarly, the AMP strategy emphasized the need to include SES assessments in the site selection processes to overcome the low participation capacity by local communities in the baseline.

Table 1. Preliminary SEP

#	Stakeholder Group	Role/Relevance	Interest in the project	Influence on the project	Participation capacity	Perception of problem
1	State and local government authorities, i.e. public sector entities	Project partners and co-financiers	Public sector has been involved in project design, and is expected to plan a key role during implementation.	High	High	Will require skills, activities and measures new to their usual practice and scope.
2	Private sector associations, and ESPs involved in the 3 project's pilots	Project partners and direct beneficiaries	Given the nature of the minigrid regulatory framework and market in Comoros, the private sector is crucial for project success.	High	Moderate	Lack of certainty in the market nationally to de-risk investment
3	Development partners	Co-financiers	The project is designed to build upon ongoing work and collaborate with development partners to avoid work-duplication to the extent possible.	Moderate	High	Improved coordination and collaboration to generate synergies and leverage efforts and impacts
4	Communities in pilot sites (and further)	Direct beneficiaries and affected persons	End-users of electricity to be generated from the pilot projects.	High	Low	New set of problems for some and opportunities for others. Need for awareness raising, capacity building and access to financing
5	Academics, educational institutions and vocational training centers	Direct beneficiaries and project partners	Recipients and providers of training and future implementers of the academic certification programme.	Moderate	High	Difficulties to find students In RE, lack of awareness raising & communication,
6	Financial institutions and small investors	Direct beneficiaries	Recipients of training and future implementers of innovative financing schemes and incentive mechanisms.	High	High	Lack of certainty in the market nationally to de-risk investment
7	Developers and ESPs not involved in the pilot project(s)	Indirect beneficiaries	Affected by project outcomes and potential beneficiaries of replication. Would benefit from some capacity building efforts as well.	Moderate	Moderate	Lack of certainty in the market nationally to de-risk investment; lack of capacities and experience in minigrids
8	Industry groups (agriculture, fisheries, manufacturing)	Indirect beneficiaries	Affected by project outcomes and potential beneficiaries of replication.	Low	Moderate	Lack of energy access to improve their profitability and optimize resources
9	Communities in non-pilot location	Indirect beneficiaries	Affected by project outcomes and potential beneficiaries of replication. Study visits and awareness raising	Low	Low	New set of problems for some and opportunities for others. Need for

			campaigns at national level (Component 4)			awareness raising, capacity building and access to financing
10	NGOs and civil society groups	Indirect beneficiaries	Especially the groups working on energy access, climate change, renewable energy development, etc.	Moderate	Moderate	Disadvantaged groups are usually left behind/outside of the project benefits (i.e. women, poor, disable, indigenous...) – included in the project
11	Other groups	To be identified as part of pilot site assessments and national studies to be conducted				To be determined

7 Grievance Redress Mechanism (GRM)

The risk assessment conducted as part of developing the SESP for the project indicates that there is a likelihood of reprisals and retaliation against stakeholders. AMP Comoros intends to follow a policy of zero tolerance for such actions and develop possible preventative and response measures specific to the circumstances together with relevant stakeholders. Measures may include respect for confidentiality; adjustments to means and timing of communications, meetings, transportation; use of trusted intermediaries, interpreters, facilitators and other consultants; clear response protocols for notification, reporting, and support for protection strategies.

Furthermore, and as part of the project's compliance with the UNDP SES requirements, the project shall ensure setting up a suitable Grievance Redress Mechanism (GRM). This includes a procedure for stakeholders and affected communities to express their grievances and communicate their concerns and recommendations to the project team, as well as a procedure for the project team to address these grievances by taking the necessary actions, i.e. providing clarifications, opening investigations, or making changes to the project's implementation plan as may be required.

In the area of ensuring open communication on grievances, the project intends to implement the following measures:

- 1) Two boxes will be installed at the pilot project sites. The first will be placed inside and the pilot boundaries while the second will be located outside the project boundaries. These boxes will be checked on a regular basis by the project's M&E officer to check for new comments from stakeholders.
- 2) The phone numbers for the project's M&E and SES Officers will be displayed at several central locations around the pilot location, i.e. community centers at villages receiving electricity from the pilot project and nearby villages as appropriate.

The responsibility of responding/addressing the grievances received will depend on the nature of the grievance. Nevertheless, the SES Officer will be responsible for following up until actions are taken to close a grievance, including communicating with relevant persons and/or authorities on behalf of the project. Further details on the GRM will be developed during Year 1 of project implementation and prior to starting the work on the pilot project(s).

In addition to the developed GRM, stakeholders will be informed of the availability of UNDP's Accountability Mechanism (Stakeholder Response Mechanism, SRM, and Social and Environmental Compliance Unit, SECU) as additional avenues of grievance redress.

8 Monitoring and Reporting

As project information changes, the SEP should be reviewed and modified accordingly to ensure its effectiveness in securing meaningful and effect stakeholder participation. Hence, the SEP presented in this document will undergo continuous review and development by the project's SES and M&E Officers throughout the project lifetime. Similarly, the scope and focus of the SEP will be modified to reflect the lessons learned from the implementation of SEP in Comoros, but also in other national projects participating in the Regional AMP. Equally important is the review and update of SEP procedure based on the feedback that would be received form the project team and stakeholders.

The continuous review and update of the SEP will be implemented as part of the implementation of the overall M&E plan for the project (Annex 5), as well as the operationalization of the M&E systems developed under Component 4.

Before this activity starts, the SES Officer will have approved the detailed plans ensuring the following:

- The Monitoring and Reporting involves project stakeholders (including target beneficiaries and project-affected groups) or third-party monitors in the monitoring of project implementation, potential impacts and management/mitigation measures.
- The Monitoring and Reporting describes how and when the results of stakeholder engagement activities will be reported back to project-affected and broader stakeholder groups. Examples include newsletters/bulletins, social and environmental assessment reports, monitoring reports.

9 Annex 1 – Inception Workshop - Attendees List

1. Workshop in Mohéli

Fomboni, le 08 septembre 2020

Atelier de Lancement de la Conception du Projet National sous le Programme Mini-Réseaux Afrique (AMP) du GEF/EM à Mohéli

Objet : liste de présence

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3. Workshop in Grande Comore

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