



Elevating Ecosystem based Adaptation (EbA) approaches to sustain life and critical ecosystems in the Tsimanampesotse-Nosy Ve Androka Biosphere Reserve seascape and scaling up in the South Western Indian Ocean (SWIO) Region.

Annex E: Stakeholder Engagement Plan

WWF Madagascar Country Office

Blue Action SEP

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1. Introduction

The purpose of the Stakeholder Engagement Plan (SEP) is to demonstrate how “Elevating Ecosystem based Adaptation (EbA) approaches to sustain life and critical ecosystems in the Tsimanampesotse-Nosy Ve Androka Biosphere Reserve seascape and scaling up in the South Western Indian Ocean (SWIO) Region”. (hereafter referred to as “the Project”) has engaged with stakeholders during project design (design of the concept and full proposal), and the proposed stakeholder engagement process that will be followed during the Project’s planning and implementation.

Stakeholders are individuals or groups who are affected, or likely to be affected by the Project (“Project-Affected People/ Parties”) and/or may have an interest (stake) in the project (“Interested Parties”), or be able to influence its outcome, either positively or negatively. Stakeholders include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses¹.

The stake that each of these different individuals or groups will have in a project varies. So we will analyse and get an understanding of the degree to which stakeholders are affected by the current project (and therefore the type of engagement that is expected as a result, from a safeguards perspective), and the degree to which a stakeholder has an interest and/or influence in the project (and therefore the type of engagement that is required to ensure a successful and sustainable project).

This stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of others, and building relationships based on collaboration. This stakeholder engagement is an on-going process that builds a positive relationship between the project and its stakeholders. This stakeholder engagement is also an inclusive process to support the development of strong, constructive and responsive relationships which encourage positive outcomes for both stakeholders and conservation, and that help to identify and manage risks.

Engagement strategies included disclosure of information, consultation and equitable participation of the most vulnerable. The intensity of stakeholder engagement varies as a function of the likely level of impact of our project on stakeholders and potential risks. The intensity and scale of engagement varies also with the type of activities, socio-political complexities, geographical remoteness, technical and technological capacities, etc. Culture also influences the engagement of certain stakeholders. The mobilization of stakeholders differs then from one actor to another, depending on the above mentioned parameters and factors.

In this sense, this Blue Action Fund ESMS applies both Free Prior and Informed Consent (FPIC), Informed Consultation and Participation, Consultation, and Information Sharing, as types of engagement², as indicated in Section 2.2. Our project will adopt a process of FPIC with local communities’ customary land and marine use areas. Such FPIC is conducted following a culturally and socially appropriate forms of engagement that increases community ownership and engagement in marine conservation efforts, and manages potential E&S risks and impacts.

The WWF MDCO team and partners will engage with stakeholders based on the following principles:

- *Stakeholder identification and engagement begins as early as possible in the design of activities. It aims to identify and analyse the socio-political-economic situation of project-affected people, and local organizations which represent them. This includes analysis of rights, claims and relations of differing stakeholders, and initial stakeholder views on conservation aims, which help to inform the early design of activities.*

¹ IFC. 2007. Stakeholder Engagement: A good practice handbook for companies doing business in emerging markets. Pp. 10.

² Refer to the Blue Action Fund ESMS Glossary of Terms and Section 2.2 below for more details on the four above mentioned categories of engagement.

- *Engagement is carried out on a continuous basis, and as new environmental or social risks and impacts may arise.*
- *Engagement is carried out in a culturally sensitive, non-discriminatory and inclusive manner. Engagement actions are targeted to the audience, taking into account the different access and communications needs of various groups and individuals, especially those who are vulnerable or disadvantaged.*
- *Consultations are based on the prior disclosure and dissemination of relevant, objective, meaningful and easily accessible information in a timeframe that enables consultations with stakeholders in a culturally appropriate format; must be carried out in a non-discriminatory and gender-responsive manner, free of external manipulation, interference, coercion, discrimination and intimidation.*
- *Stakeholder feedback is encouraged.*

Blue Action Fund and World Wide Fund for Nature (WWF) Madagascar Country Office (MDCO) are committed to complying with national and international stakeholder engagement and disclosure requirements; (national compliance with the MECIE : ensuring compatibility of investments and the environment, decree n°2004-167 of 2004 and the Environmental Charter (Loi n°2015-003 of 2015).

Public Consultation and disclosure:

- *When developing environment and social safeguards assessments (ESA) and developing management plans (ESMP), WWF MDCO Team will conduct meaningful consultations with relevant stakeholders, including affected groups, CSOs, and local authorities, concerning the project's environmental and social impacts (positive and negative) and to take their views into account. For meaningful consultations, the WWF MDCO Team provides relevant information in a timely manner and in a form and language (Malagasy) that are understandable and accessible to diverse stakeholders.*
- *The Project Team consults relevant stakeholders two times: (a) during scoping and before the terms of reference for the ESA are finalized, (b) once a draft ESA report is prepared. For the initial consultation, the WWF MDCO Project Team provides a summary of the proposed project's objectives, description, and potential impacts. For consultation after the draft ESA report is prepared, the Project Team provides a non-technical summary of the report's findings. In both cases, the summaries are provided in advance of consultation and proactively disseminated to local stakeholders in French and malagasy language meaningful to those being consulted. Following the public consultation on the draft ESA, the Project Team supplements the ESA by adding details of the public consultation process, as necessary, including the Project Team's responses to concerns raised by the various stakeholders and details of measures taken to incorporate these concerns into project design and implementation (consideration into the E&S tools).*
- *During implementation phase, WWF MDCO Project Team will continue to engage relevant stakeholders throughout project implementation and operation, as necessary, to address any environmental and social safeguard risks and other issues that affect them. The priority placed on consultation with potentially affected people (men and women) should, however, not be at the expense of consultations with other relevant groups (relevant municipal/regional/national administrations, locally elected leaders, private sectors etc.).*
- *All key safeguards documents : ESA, ESMP are publicly disclosed on the WWF web page. In addition to this, these final safeguards documents will be published on WWF MDCO national websites and made available locally in specific locations accessible to affected communities. (Since project-affected people may not have reasonable access to a WWF office or to the Internet, the Project Team will locally release all final key safeguards documents via hardcopy, translated into the malagasy language and in a culturally appropriate manner, to facilitate awareness by relevant stakeholders that the information is in the public domain for review.*

The SEP (comprising this document and an Excel document) is a public document and will be disclosed to all Project Affected People and other project stakeholders. It is also a "living document" that will be revised

and updated to account for the ongoing stakeholder engagement activities and potential changes in the Project. In Blue Action-funded projects, this safeguard instrument is annexed under the Environmental and Social Management Plan (ESMP), which serves as the umbrella Safeguard Instrument. The SEP should complement the ESMP, and be developed and applied in conjunction with the Project's Grievance Mechanism. The Blue Action Fund requirements for stakeholder engagement, and timings for these, are detailed in Table 1.

Table 1: Blue Action Fund requirements for Stakeholder Engagement (Blue Action Fund E&S Safeguarding Principles and Requirements, ESMS Manual Annex B).

Requirement	Project design		Project implementation		
	Concept note stage	Proposal stage	Inception Phase	Annual (or end of Year 1)	Project closing phase
Stakeholder identification [Criterion 2.1]	Required	Na.	Na.	Na.	Na.
Stakeholder analysis and consultation [Criterion 2.2]	Na.	Required	Na.	Na.	Na.
Stakeholder engagement [Criterion 2.3]	Na.	Required	Required	Required	Required
Disclosure and reporting [Criterion 2.4]	Na.	Required [initial disclosure]	Required [subsequent disclosure]	Required	Required.

- *During project proposal development, the WWF MDCO team will develop a Stakeholder Engagement Plan (SEP) in consultation with relevant stakeholders as part of programme design and disclosed, according to the following steps:*
 - *Identify Project-Affected People - those likely to be affected by the project because of the actual impacts or potential risks to their physical environment, health, security, well-being and livelihoods, and who, because of their circumstances, may be disadvantaged or vulnerable. Based on this, the WWF MDCO Team will further identify individuals or groups (ex: migrants, women) who may require different or separate forms of engagement, mitigation mechanisms, and benefits.*
 - *In consultation with those stakeholders, develop a Stakeholder Engagement Plan (SEP) which is proportionate to the nature and scale of the activities and potential risks and impacts, and addresses the concerns expressed by stakeholders.*
 - *Disclose a draft Stakeholder Engagement Plan to seek the views of interested parties.*
 - *Finalize the SEP based on the views and feedback, and then disclosed.*
 - *During project implementation, the WWF MDCO Team will execute the SEP as follows:*
 - *Continue to engage with and provide information to all stakeholders, including Project-Affected Peoples on the potential environmental and social risks and impacts of the project.*
 - *Communicate significant changes to the project that will result in additional risks and impacts to Project-Affected People. WWF will provide information on such risks and impacts and consult with Project-Affected People as to how these risks and impacts can be mitigated.*
 - *Respond to concerns and grievances from Project-Affected People in a timely manner and in line with the Standard on Accountability and Grievance Mechanism.*

All stakeholder engagement ex: meetings, workshops, etc. will be well documented, with aims, key outcomes, concerns raised, agreements, as well as time, date, place and attendance. The WWF Landscape Manager is responsible for the implementation of the Stakeholder Engagement Plan and will designate within her team specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

1.1 Purpose of the Stakeholder Engagement Plan

The overall aim of the SEP is to ensure that a timely and appropriate approach is taken to engagement with stakeholders. The SEP outlines how the Project will further engage the various stakeholder groups throughout project design and implementation in order to ensure that their views and concerns are heard and taken into account. The purpose of having a SEP is to ensure a successful and sustainable project, and alignment of the project with international good practice approaches to stakeholder engagement, including the World Bank Environmental and Social Framework (WB ESF 2017), particularly Environmental and Social Standard 10 (ESS10). This SEP will strengthen WWF's engagement with local communities who may be impacted by the present project, as required in WWF's Social Policies, Project and Program Standards (PPMS).

The objectives of the SEP are to:

2. Identify and analyse stakeholders during the project design, listing all relevant stakeholders and analysing each in relation to their potential interest in and influence on the project, as well as the project's potential impact (positive and negative) on them;
3. Actively obtain input from a broad spectrum of stakeholders at local, regional, national and international levels, with particular emphasis on Project Affected Peoples, through meaningful consultation;
4. Provide stakeholders with adequate, clear, timely and consistent information regarding the Project and project activities, including impacts and opportunities that may arise and proposed management measures/ solutions, as well as the manner in which they can participate in this process;
5. Provide sufficient opportunity/mechanism for stakeholders to raise issues, make suggestions and voice their concerns and expectations with regard to the Project;
6. Build capacity among stakeholders to enhance their ability to interpret the information, as well as to contribute their issues of concern and suggestions for enhanced benefits;
7. Working directly with the stakeholders and in particular, the Project Affected Peoples, throughout project implementation to ensure that public concerns and aspirations are consistently understood and considered by WWF MDCO; and
8. Provide stakeholders with timely feedback on whether and how their inputs were incorporated into project decisions particularly relating to management measures and strategies for enhancing benefits, and including the effective and timely management of any grievances related to the project.

Overall, the SEP will assist with building strong relationships between WWF MDCO and its stakeholders, creating an atmosphere of mutual understanding, respect, trust and collaboration. Active engagement will also give the Project Affected People a sense of ownership and/or a stake in decision-making process pertaining to the Project, thereby allowing the Project to gain and maintain a social licence to operate and to grow. Importantly, regular engagement will help with managing expectations of the Project Affected People and other stakeholders from the beginning of the Project and throughout implementation, thereby ensuring that any expectations are realistic and factually informed.

The structure of the SEP is as follows:

1. Introduction (this section);
2. Stakeholder identification and analysis (Section 2);
3. Stakeholder engagement, including past and planned engagement (Section 3);
4. Grievance procedures (Section 4);
5. Stakeholder register (Section 5); and
6. Monitoring, evaluation and reporting (Section 6).

2. Stakeholder Identification and Analysis

The stakeholder identification and analysis described in this section has been carried out in **Annex E.1** (the accompanying Excel document).

2.1 Stakeholder identification

Different stakeholders will have different positions and views on the Project. As such, it is important that all stakeholders be identified as early on in the project design as possible, whilst remaining cognisant not to raise expectations about the potential project benefits. Stakeholder identification and analysis is a tool that helps identify the key actors (or stakeholders), and assess their respective interests, influences, and degree to which they might be impacted.

The first step in the process of stakeholder engagement is stakeholder identification – determining who the project stakeholders are and their key groupings and subgroupings (e.g., Government, local communities, NGOs, Civil Society etc.). The objective of stakeholder identification is to establish which organisations, groups, local communities and individuals:

- *May be directly or indirectly affected (positively and negatively) by the Project and its activities, making special effort to identify those who are directly affected, including the disadvantaged or vulnerable individuals;*
- *May have an interest (stake) in the project;*
- *May have the potential to influence project outcomes or implementation because of their knowledge about the Project Affected Peoples or political influence over them for example.; and*
- *May be the legitimate representatives, including elected officials, non-elected community leaders, leaders of informal or customary community institutions, for example.*

As stakeholders do not have the same relevance/importance/weight, to be involved or not, their identification considers several parameters. The most important parameter is the interest in the Project, i.e. in the different types of activities that will be initiated by the present BAF Project.

Stakeholder identification for the present project was initiated during the scoping phase of the project, and stakeholder mapping is further developed following field visits conducted by the consultants hired by WWF during September 2021. The stakeholder mapping workshop was undertaken to:

- *Confirm the stakeholders and groups who were identified in initial scoping exercises and further revise and update the stakeholder list with input from key stakeholders;*
- *Analyze the level of impact the project has on each stakeholder group, their level of interest, influence and importance to identify the level of engagement required for each group; and*
- *Develop an engagement strategy for each stakeholder group and assign responsibility to team members.*

Stakeholders of the proposed project(s) can be divided into the following core categories:

1. Stakeholders affected by the Project :

- **Individuals, groups and other entities** which are located within the Biosphere Reserve that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Affected stakeholders include local population, community members and other parties that may be subject to direct impacts from the Project. These may include, but not limited to:
 - Individuals and households that will be directly affected (physically or economically) by resources access restriction linked with the project activities (Protected area, LMMA, fishery temporary reserve).
Prior to the establishment of Nosy Ve Androka MPA, an environmental and social safeguard plan was established, identifying stakeholders being impacted or touched with the MPA project. Part of the present BAF safeguard plan is i) the assessment of the

vulnerability of those identified stakeholders with regards to resources access restriction (restriction access to these resources having an impact on those stakeholders sources of income and standard of living).; ii) and the participative identification of supports to be given to the most vulnerable. An access restriction management agreement with local inhabitants is available.

- Beneficiaries : Inhabitants of the project affected villages within the biosphere reserve seascape (fishermen and small farmers, including women) and LMMA and seasonal climate migrants (from inland) who can benefit from the project;
 - Intermediary institutions (Cooperative, LMMA Federation);
 - Government officials, including mayors of municipalities located in the project areas, The “Fokontany”³, the environmental protection authorities (Madagascar National parks MNP);
 - Public and private organizations and businesses whose normal operations are affected by the project activities.
- **Stakeholders involved in the coordination, technical support and implementation of the Project**

(Biosphere Reserve Management plan), located at the regional level (Atsimo Andrefana Region), the list below is still provisional⁴:

- CTD (Decentralized Territorial collectivity) : Region, Communes ;
 - Administrative divisions : i) Prefecture (led by the Prefect) ii) district level government authorities, and iii) STD : Deconcentrated State Services (Regional Direction of Environment and Sustainable Development DREDD, Regional Direction of Fisheries and Blue Economy DRPEB, Regional Direction of Agriculture and Husbandry, Regional Direction of Territory Planning l’Aménagement du Territoire), Chambre de commerce et d’industrie (CCI) Regional consultation committee (Comité Consultatif Régional CCR).
- **Stakeholders involved in the coordination, technical support and implementation of the Project**, located at national and SWIO Regional level: Ministry of Environment and Sustainable Development (MEDD) and the Ministry of Fisheries and Blue Economy (MPEB)
- **Stakeholders having direct responsibilities in the implementation and monitoring of activities :**
 - Organisations involved in project implementation : WWF MDCO, CRS (Catholic Relief Services), MIHARI platform and staff, Conseil Diocésien de Développement Toliara (CDD) and staff, UNEP WCMC, CORDIO, WIOMSA.
 - CTD (Administrative Bodies and Authorities Decentralised Territorial government: Region, Communes) ;
 - Deconcentrated State Services: (Regional Direction of Environment and Sustainable Development DREDD, Regional Direction of Fisheries and Blue Economy DRPEB, Regional Direction of Agriculture and Husbandry, Regional Direction of Territory Planning (Aménagement du Territoire), Regional Direction of Meteorology, Regional Direction of Population, social Protection and women Promotion, Regional Direction of National Education (DREN).
 - Recruited service providers who will support and strengthen decentralized administration bodies and local communities.
- **Indirectly Affected Population or other interested parties** – individuals, groups and/or entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. These parties may include, but not limited to:

³ The “Fokontany” is the basic administrative subdivision at the commune level (one Commune is subdivided in different “fokontany”).

⁴ Final list of coordination members to be established as project outputs (Structure of Biosphere reserve operationalized)

- *Individuals, families or communities residing in Biosphere Reserve but not directly targeted who can benefit from investment opportunities stemming from the project (ex: early warning system, cash for work);*
- *“Fokonolona”: assembly of communities including fishermen and Farmers from communities surrounding the project areas (targeted villages) who can benefit from project-supported access market for example;*
- *Civil society organizations (CSOs) such as women association, youth association, LMMA network MIHARI;*
- *Local platforms of exchange and coordination (octopus fishery platform CGP, aquaculture platform, network of actors involved in the fight against illegal trafficking of natural resources and species);*
- *Public and private organizations, local entrepreneurs, non-government organizations (NGOs) dealing with agriculture and fishery;*
- *Business owners and providers of services, goods and materials within the project area.*

2. Other stakeholders :

The other stakeholders present any actor having an interest in the implementation of the Project. They are composed by:

- *Technical and financial partners, through active development projects or programs in the intervention areas of this BAF Project;*
- *National and Regional (SWIO) civil society;*
- *Traditional authorities and customary institutions: “Mpitankazomanga” Chief of lineage, clan elders.*
- *Private sector;*
- *NGOs (efg: Blue Ventures, WFP);*
- *Media.*
- *Funders (BAF, KfW, WWF CH).*

a) Identified disadvantaged or vulnerable groups

Vulnerable groups⁵ - *persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.*

Vulnerable groups within affected stakeholders are made up of individuals who meet at least the following so-called “human development” criteria: i) lack of permanent income; ii) sources of income entirely linked to natural resources; iii) Female-headed household iv) no access to cultivated land.

Potential vulnerable groups were identified during the stakeholder identification process (proposal development phase), and include:

- *Women (housewife, female head of household) who are often marginalized or excluded, during meetings and general assemblies. In the project intervention area, women (traditionally) do not have the right to speak and do not enter into discussions except in meetings specifically for women;*

⁵ The term "vulnerable" refers to individuals or groups who are more likely to suffer from the effects of the project and/or are more limited than others in their ability to enjoy the benefits of a project (unequal access to rights, (unequal access to and control over resources or unequal access to development opportunities). As a result, they may be poorly integrated into the formal economy, may suffer from inadequate access to basic public goods and services, and may be excluded from political decision-making. These individuals or groups are also more likely to be excluded from or unable to participate fully in the general consultation process, and may therefore require specific measures and/or assistance.

- *Female-headed households with children under age of 14;*
- *Very young couple (unemployed, out of school: forced to get married to become labor force) who cannot participate voluntarily in discussion on the economic and social development of society. Like women, youth without situation is excluded from discussion;*
- *people with disabilities (Heads of households with disabilities (physical and/or mental) experiencing problems or difficulties in exercising an economic activity);*
- *Elderly without support;*
- *Migrants : they don't have their voices in decision-making (they are often excluded from exchange);*
- *Low-income farmers and fishermen, completely dependent on natural resources for their livelihood, who have limited ability, have only one type of livelihoods, do not have assets (cultivated land and/or livestock) or limited savings and do not belong to any association. Support and aid are often granted to producer associations and only the members' benefit from it.*

These groups are considered vulnerable as their present circumstances may prove challenging for their ability to take advantage of resources and opportunities offered by the project activities.

Three levels of vulnerability are identified:

- *Level 1: ultra-vulnerable without assets and very limited means of subsistence,*
- *Level 2: extremely vulnerable with limited assets and livelihoods,*
- *Level 3: moderately vulnerable with few assets and good means of subsistence.*

Further deep identification of vulnerable people will be made through this project during the inception phase of the project⁶. The above list of vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

2.2 Stakeholder analysis

Stakeholder analysis aims to examine the interests and potential influence of all stakeholders who may be affected by the Project, and who also influence the achievement of project objectives. This review will help plan how to enhance the role of stakeholders who are in favor of the project, while minimizing the risk posed by those who are unfavorable or opposed to the project.

After identification follows a stakeholder analysis which provides a more in depth look at the identified stakeholder groups. Identified stakeholder groups/ stakeholders are often analysed using three criteria, and the results of this exercise (which can be repeated at any time, and is often an iterative process) then inform the type of stakeholder engagement that is likely to be required, therefore forming the basis for the stakeholder engagement strategy.

1. *The potential of the project to impact the stakeholder (positively or negatively) - Impact is normally used to describe how the problem or project will impact the actor. Indicative impact categories that could be used are provided in **Table 1 of Annex E.1 (Tab 1.1)**.*
2. *Stakeholder's interest (stake) in the project – Interest is the level of interest (stake) of the stakeholder in the problem/ issue at hand and/or the Project and its activities. Indicative*

⁶ Vulnerability assessment is planned resulting in a database of most vulnerable households (MVH), list of MVH, mapping. We will value existing database with WWF and CRS existing projects (ex: MAHARO project).

categories that could be used to determine level of interest are provided in **Table 1 of Annex E.1 (Tab 1.1)**.

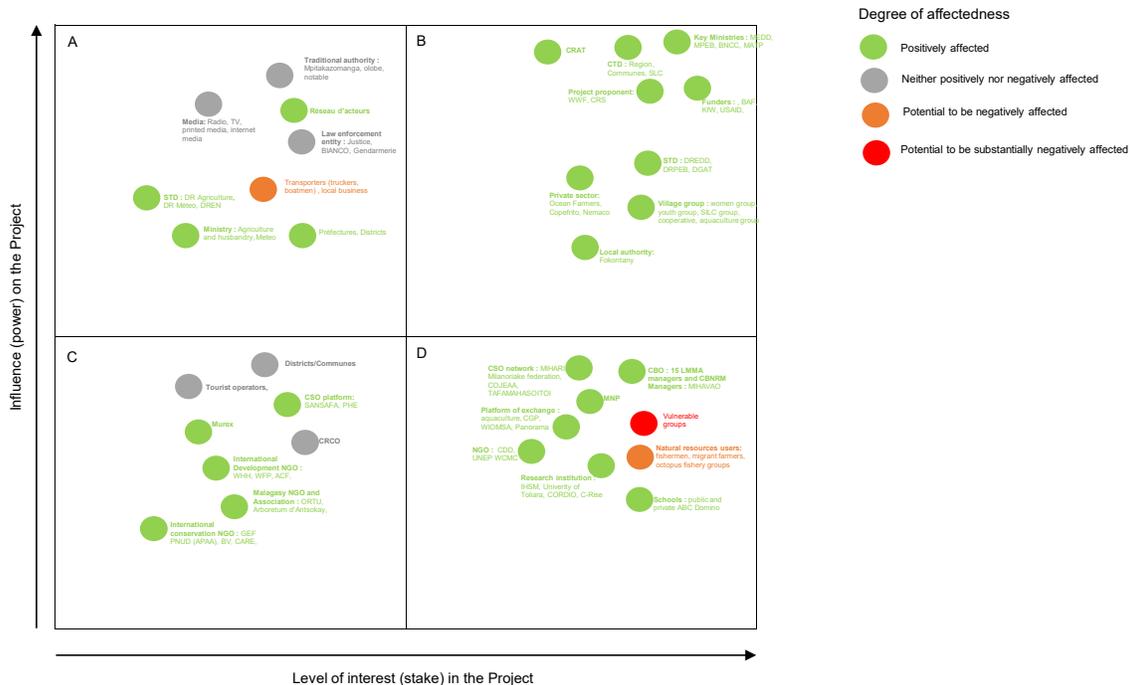
3. Stakeholder's potential to influence the Project and other stakeholders - Influence (or power) is the ability of the actor to influence positively or negatively the achievement of the objectives set by the Project (influence on other stakeholders and the Project's activities).

The stakeholder analysis for this BAF project is provided in **Tab 1.1 (Stakeholder Analysis) of Annex E.1**. The **Tab 1.2 (Stakeholder Analysis)** displays the stakeholders mapping, **Figure 1**. The stakeholders are mapped by group, based on the level of influence and level of interest.

In the stakeholder mapping figure four categories of stakeholders are highlighted, each category of stakeholders is characterised by a colour code: (A) stakeholders with strong influence and less interest/stake – these stakeholders would normally be kept in check so that influence is not out of proportion to stake; (B) stakeholders with strong influence and a high interest/stake – these stakeholders would normally be closely involved at all stages; (C) stakeholders with weak influence and only weak interest – involvement of these stakeholders is unlikely to be critical to project success; (D) stakeholders with weak influence, but a high stake – these stakeholder often require additional support for their involvement to overcome their lack of influence;

The stakeholder identification for this BAF project was initiated during the project scoping phase (concept note), and the stakeholder mapping is further developed following field visits to project sites conducted by both the consultants hired for the ESA (Environmental and Social impact assessment), and also WWF MDCO team.

This preliminary stakeholder mapping will be refined during the course of the project implementation.



A	Stakeholders with strong influence but less interest. They need to be involved but should be kept in check so that their influence is not out of proportion to their stake.
B	Stakeholders with strong influence and a high stake. They need to be closely involved at all stages.
C	Stakeholders with weak influence and only weak interest. They could be involved in some steps but this is probably not critical to the overall process.
D	Stakeholders with weak influence, but a high stake. They need to be involved and their involvement needs to be supported to overcome their lack of influence.

The “Type of engagement” required based on the Project’s potential impact on the stakeholder is stated clearly in the stakeholder analysis, to demonstrate that the extent and degree of engagement is commensurate with the risks and impacts of the Project, as per the Blue Action Fund Standards. (Tab 1.1 (Stakeholder Analysis) of Annex E.1, “Type of engagement required: Column L”).

The categories of engagement type include:

1. **‘Free, Prior and Informed Consent (FPIC)’**, for local communities potentially affected by the Project;
2. **‘Informed Consultation and Participation (ICP)⁷’**, for potentially significant adverse impacts on the stakeholder in question;
3. **‘Consultation⁸’**, also referred to as ‘meaningful consultation’ for the case impact and type of engagement is not yet clear and needs to be understood, or in cases where the potential impacts are not significant, but the stakeholders are affected nonetheless; and
4. **‘Information sharing’**, for all other stakeholders where there is no identified potential impact; information should be shared with stakeholders in 1-3 as well.

These are the minimum levels of engagement required, based on potential impact of the Project on the stakeholder.

Stakeholder engagement strategy :

(A) Stakeholders with strong influence and less interest/stake – these stakeholders would normally be kept in check so that influence is not out of proportion to stake. For the stakeholders falling under the strong influence and less interest stakeholder group, the project will put effective efforts to keep them informed. The E&S focal person will maintain regular contacts and organize targeted consultations with the group in every six months. The project will update the project status, including past activities in relation to the E&S risks management, the activities planned in coming months and the possible E&S risks. The E&S focal person will prepare a minute with signatures of the participants and the minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting E&S focal person will readout the minutes and a copy of the minute will be made available to the local ward office of concerned municipalities.

Major engagement strategy:

- Maintain regular contact with individuals/institutions categorized in this group;
- Organize informed half-yearly consultation meetings;
- Provide updates about the project including the past and upcoming ones.

(B) Stakeholders with strong influence and a high interest/stake – these stakeholders would normally be closely involved at all stages. Stakeholders with strong influence and high interest will be managed closely and with serious efforts to fully engage them. The E&S focal person, will maintain in close contact with these stakeholders. In addition, the E&S focal person will also organize quarterly consultations with the stakeholders where project managers will update the project status, including past activities in relation to the E&S risks management, the activities planned in coming months and the possible E&S risks and impacts, and record concerns, issues and suggestions raised by the stakeholders.

Major engagement strategy:

- Maintain contact details of the individuals/institutions categorized in the group and update it regularly;
- Maintain regular and close contacts;
- Organize informed quarterly consultation meeting;
- Provide updates about the project including the past and upcoming ones;
- Organize quick and short exposure visits, when required.

⁷ See Blue Action Fund ESMS Glossary of Terms for definition of ICP.

⁸ See Blue Action Fund ESMS Glossary of Terms for definition of Consultation.

(C) Stakeholders with weak influence and only weak interest – involvement of these stakeholders is unlikely to be critical to project success. For the stakeholders that have weak interest and weak influence stakeholder group, the project and subproject will monitor their activities. For this, the E&S focal person will remain vigilant about the activities of this group and will share project related information when demanded.

Major engagement strategy:

- Monitor activities of the categorized in the group;
- Share project-related information.

(D) Stakeholders with weak influence, but a high stake – these stakeholders often require additional support for their involvement to overcome their lack of influence. For the stakeholders falling under the weak influence and high stake stakeholder group, the project will put efforts to keep them informed. The E&S focal person will maintain regular contact and organize targeted consultations with the group once in a year. The project manager will update the project status, including past activities in relation to the E&S risks management, the activities planned in coming months and the possible E&S risks. The E&S focal person will prepare a minute with signatures of the participants and the minutes will include the issues discussed and the decisions or actions agreed in the consultative meeting. At the end of every meeting E&S focal person will readout the minutes and a copy of the minute will be made available to the local ward office of the concerned municipalities.

Major Engagement strategy:

- Maintain contact with individuals/institutions categorized in the group;
- Organize informed yearly consultation meeting;
- Provide updates about the project including the past and upcoming ones.

3. Stakeholder engagement

The disclosure of relevant project information⁹ will be done well in advance of the start of the Project. Ongoing stakeholder engagement activities ensure that stakeholders are kept informed and have an opportunity to continue a constructive dialogue about the project and provide feedback. Updated versions of the SEP, which are under responsibility of WWF MDCO will be consulted with Project Affected People to achieve feedback on perception of engagement during the entire life of the project.

Additionally, the implementation of the SEP will be subject to regular monitoring through the Blue Action Fund. All personal information (e.g., name and contact details) collected for the purposes of the SEP and maintained by WWF MDCO will be done so in a secure manner in line with Blue Action Fund's GDPR Policy. This personal information will not be included in the SEP at any time.

The Sections below give a brief description of stakeholder engagement actions that have already taken place as well as engagement actions to be taken to implement this SEP.

3.1 Stakeholder engagement already undertaken

This section describes all of the stakeholder engagement activities that have taken place prior to project implementation. (**Annex E.1, Tab 2 (Engagement to Date)**).

During concept note and proposal development phase, we organized consultation sessions:

⁹ See Blue Action Fund definition of relevant project information in the ESMS Glossary of Terms. Ensure that personal information/ data is not disclosed, as per the Blue Action Fund GDPR Policy. Also be aware of sensitive information, such as information relating to cultural heritage that could endanger the integrity of that heritage, or in conflict situations where even basic information (e.g. location of settlements) cannot be disclosed: this should be decided and understood on a project by project basis.

- i) at local level with the people and entities that will be directly impacted by the project;
- ii) at regional level, with potential partners who will be involved in the implementation (e.g. private sector) or in the coordination (DREDD, territory planning, Coastal Management committee).
- iii) at national level, with the main Ministry concerned by the project (MEDD, BNCCC) and with the network of National Parks (MNP).

Local consultation in the Biosphere Reserve :

Field visit for the purpose of the ESA is conducted in the Biosphere Reserve, by a team of consultants between 04 to 15 September² 2021, that permits also the preparation of this SEP. The visits give an opportunity to conduct stakeholder meetings.

Regional consultation on the draft of ESA and mitigation :

With an aim to have regional stakeholders' comments and feedback on E&S risk assessments and the mitigation provisions, we organize consultation with the lead of the DREDD (Environment and Sustainable Development Regional Direction) on 18 January 2022.

Due to COVID-19 situation that restricted public gathering, we organized a virtual consultation. We sent electronic invitations to the identified stakeholders along with an attachment of the draft ESA and Zoom link a week prior to the proposed date of consultation. In response, 24 stakeholders participated in the consultation from 14 institutions. An hour-long consultation began with a PowerPoint presentation, which highlighted the core project activities, potential E&S risks and proposed mitigation measures, consultations, information and grievance mechanism and organizational set up to ensure effective implementation of the ES mitigation. Following the presentation, participations are asked to provide comments, concerns or feedback on the E&S risk findings and mitigation provisions.

The summary of the major issue raised/feedback during the consultations are analysed and registered in the E&S tools (excel file) with corresponding responses (as part of the project mitigation plan).

3.2 Planned stakeholder engagement and disclosure during project implementation

Following the identification and analysis of the project stakeholders, the project will design and implement a comprehensive plan for stakeholder engagement as outlined in the table **in Tab 3 (Planned Engagement) of Annex E.1.** The table describes how stakeholder groups will be further engaged throughout project implementation in order to ensure that their views and concerns are heard and taken into account, foster constructive work relationships as well as more generally sharing of information and facilitating understanding.

COVID-19 implications and considerations for stakeholder engagements:

The Government of Madagascar has imposed various measures to mitigate the spread of COVID-19 including restrictions on non-essential movement, requirements for social distancing, and prohibitions on social gathering. Other measures have also been recommended by health organizations to limit the spread of COVID19. Given these measures, some considerations are provided below, to be considered when implementing the engagement plan.

This SEP represents a "living document" such that it can be revised to reflect changing circumstances and remain relevant and responsive to stakeholder concerns and project needs. Consequently, in the situation where COVID-19 restrictions impose too many constraints in carrying out the engagement plan as envisaged to adequately meet the needs of the stakeholders and the requirements of the project, the SEP will be revised accordingly.

- *Face to face meetings may not always be appropriate, and therefore the project will seek to avoid public gatherings.*
- *If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. The project members should articulate and express their understandings on social behaviour and good hygiene practice, and ensure that any consultations are preceded with procedures for articulate hygiene practices.*
- *The project team may consider engaging with local mobilizers or social influencers to support engagement. These could include trusted local individuals or social influencers, for example, youth social influencers, respected elderly persons, representatives of indigenous groups or women's groups. They can facilitate consultations and community engagement when public gatherings are restricted, or consultants cannot work safely with community members.*
- *Undertake consultation meetings virtually where feasible.*

Strategies for Information disclosure:

- ***Timely and effective disclosure** of relevant project-related information is crucial in helping stakeholders, including the affected persons and communities understand the risks, impacts and opportunities of the project. This BAF project will ensure that the disclosure of the relevant information will inform the stakeholders about :*
 - *The purpose, nature, and scale of the project;*
 - *The duration of proposed project and associated activities during preparation and implementation phases;*
 - *Risks and potential impacts of each activities to affected persons and communities and other stakeholders;*
 - *The mitigation plan, which will list out the measures that the project will undertake along with timeline for each activity, required financial resources and responsible units or persons within the project;*
 - *Stakeholder engagement process including grievance mechanism.*

The Project aims to use various mediums to disclose project-related information to all identified stakeholders throughout the project lifecycle.

- *The project manager and E&S focal person will make sure the disclosure programs are organized in **culturally appropriate manners and ensure participation of women and vulnerable groups**. The purpose of disclosing information is also to solicit information and input from community members and other project stakeholders through engaging in two-way discussions with project stakeholders. The project will ensure that the information disclosure materials that will be presented or distributed to the participants are prepared by the E&S focal person in a local language understandable to participants. Information will be displayed in well-publicized, visible and publicly accessible locations, to ensure that knowledge of/access to project information is not just limited to those who the project managers and E&S focal person engages with. Examples of publicly accessible locations includes Communes and "Fokontany" office their notice boards, MNP offices, schools, health centers (CSB), and community centers (ex: cooperative building), various local places where general public gather (weekly markets, shops).*
- *The project will make sure that **appropriate and reliable means of communication** is adopted to inform stakeholders about the date, time and place of disclosure events.*

The project plans to use the following means and methods for such purpose:

- *Display of public notice in various local places where general public gather (weekly market, shops);*
- *Communes and "fokontany", offices and their notice boards;*
- *School students and local schoolteachers and school boards;*
- *Health centers and their notice boards;*
- *District level communication.*
- *For **communication materials**, key disclosure and consultation materials include:*

- *Project Information Document: this document consists of a non-technical summary of the project, development timeline and milestones, updates, consultation program and opportunities for the stakeholders to participate in development of the project, timeline and venues for engagement activities, contact details for questions and queries. The Project Information Document will be updated to reflect the Project development and key activities at each phase.*
- *Project Factsheet: A short (two-pager) factsheet in Malagasy highlighting crucial project information in simple, plain language accompanied with map, graphics and pictures.*
- *Grievance Mechanism: It details how to access the grievance mechanism and lodge grievances. This will include information on how the grievance management process will work, including the timeframes for responses.*
- *Draft SEP, Draft ESMP, final SEP, Final ESMP.*
- *FAQs*

The Project related information documents will be translated into Malagasy and will be brought to the affected persons

- *Each WWF Toliara and CRS Toliara offices will also act as the project information centre. The office will welcome visitors from the local communities and the district/Commune/Région to obtain Project information, ask questions, raise issues or lodge grievances.*
- *WWF MDCO website will provide information about the BAF Project and disclose all Project related information to the wider public, in Malagasy and french languages. The website will be regularly updated with new Project updates, such as ongoing and upcoming project activities, job opportunities for local workforce,, benefit sharing and livelihood restoration activities. The Project telephone line and email will also be made to enable the public to ask questions, raise issues and submit grievances.*
- **Consultation strategy:** *The project will apply a number of strategies for communication to achieve a broader objective of the Stakeholder Engagement Plan. The project will implement various consultation methods to ensure inclusive and effective engagement with all stakeholders, affected communities and marginalized groups.*
 - *Consultation methods includes :*
 - *Community meetings appropriate to the local culture;*
 - *Focus group discussion;*
 - *Household visits;*
 - *Face-to-face meeting/ workshop;*
 - *School students and local schoolteachers and school boards*
 - *Project email address and telephone number (All stakeholders can email or call to request information, and raise issues/concerns).*

3.3 Informed Consultation and Participation

3.3.1 Background to ICP

For projects with potentially significant adverse impacts on Project Affected People, an Informed Consultation and Participation (ICP) process is appropriate. ICP involves an in-depth exchange of views and information, and an organised and iterative consultation, leading to the incorporating of the views of the Project Affected People into the decision-making process on matters that affect them directly, such as management measures (measures to avoid, minimise or compensate for identified impacts), sharing of development benefits and opportunities, and implementation issues.

The consultation process should:

- Capture all stakeholder's views (including both men's and women's), if necessary, through separate forums or engagements, and
- Reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.

Much of the consultation process has already been initiated during the project risk and impact assessment. All stakeholders (CSOs, government agencies, NGOs, local communities-women-men, young girls-young boys-elderly, etc.) were thus approached to share information on the project (nature, size, goal, duration, overall and specific objectives, expected results, pace, reversibility, scope, potential risks, procedures), identify together the risks and potential impacts of the project, their points of view and concerns and the priority mitigation measures. And consultations will continue during the implementation of the project to ensure that all stakeholders, including women and men, young girls, young boys, the elderly and vulnerable groups, including people with disabilities understood the issues and their involvement in the implementation of the project.

WWF MDCO will document the consultation process and in particular, the measures taken to avoid or minimise adverse impacts on the Project Affected People. WWF MDCO will also inform those affected about how their concerns have been taken into account.

3.3.2 Project ICP Process

*The stakeholders potentially significantly affected by the Project, requiring ICP, are listed in **Table 2 of Annex E.1***

For WWF, all stakeholders deserve to be consulted from project design to monitoring and evaluation. Indeed, the main stakeholders who were the subject of the consultations are women and men, young girls, young boys, the elderly and vulnerable groups, including people with disabilities.

The project's ICP process will include:

Generally, WWF MDCO's strategy for engaging stakeholders is based on public consultation. It makes it possible to identify direct partners, their needs and the appropriate steps to better protect them... So, we ensure that the development of project follows a participatory process through various consultations.

- *We share with stakeholders the target and scope of the project, the goals, target species, result chain, our planned/projected impacts on natural resources and the project socio economic impacts on the Biosphere Reserve inhabitants);*
- *Feedback from the stakeholders are collected, then each stakeholder agreeing to partnering with the project then present their needs and their understanding, feeling of our proposed programme. How do they link our project to their specific vocation, confront our project to the Region context and realities, what are the challenges, fears, possible conflicts, added value, risk assessment, the limits of our project...*
- *The next step is the stakeholders' sharing of their mission, vocation, strategy (if existing), action plan. How they see their contribution to the project, what concrete tasks can they take over, what are their propositions (changes they want to bring, additional propositions). This was useful already during the pre-consultation when preparing the full proposal.*
- *Identification of synergies between WWF and stakeholders' interventions: negotiation and further explanation, exchange between WWF and the stakeholders.*
- *The logical outcome of the consultation is to have a good understanding of the project by stakeholders, to have their "green light" and involvement to implement the project. The consultation main outcome also is : to identify the stakeholders contribution/commitment to the project, to frame and establish the partnership form to develop further and an agreed action plan, to have a clarification of roles and responsibilities between each participating stakeholders and WWF.*
- *To ensure that the consultations of the Biosphere Reserve are conducted in a culturally appropriate manner, traditional leaders, such as "Mpitakazomanga", chiefs of lineage are fully involved. Our programme is systematically introduced and validated with the fokonolona (villagers general assembly). We interact closely with traditional authorities as their role among the society*

is to promote peace and welfare among community members, our programme component addressing local development. By implementing the project with the support of traditional authorities, valuing their support/knowledge, we ensure that the community members, our implementing partners, ourselves observe the customary law of that community.

- As culture in the Biosphere Reserve (Mahafaly ethnic group mainly) is discriminating to young and female gender (“manavaka aja amin’ampela”), we organize our consultation by following a double approach:
 - a. Meeting following “a generalized approach” with the fokonolona assembly, that see the presence of representatives of the village inhabitants (male, female, youth), but without the participation of vulnerable group and women and youth in discussions.
 - b. Meeting following “a differentiated approach” targeting specifically women, youth, marginalized people, migrants.
- During the lifetime of the project, the CBO (Community Based Organisation), federations, CSO involved with WWF project will conduct regular consultations with their members, and maintain dialogues with local people with regards to the project implementation (advancement, challenges, risks, potential conflicts). For a better integration of the project, and to maintain permanent presence, communication and dialogue at local level, WWF works with ACLs (local contact agents). ACL are communities’ members that are proposed by the Commune to work and implement the project with WWF. Those ACL are financially supported by WWF and facilitate all contact and relationship with local populations and ensure locals’ needs and local cultures/customs are addressed by the project. They are given capacity enforcement to act as a project relay person.
- Building trust between participating stakeholders and WWF: regular contact, meeting is organized between participating partner and WWF (at least on a quarterly basis to regularly get feedback: findings, achievements, constraints, are time schedules still realistic). During the BAF project implementation we will improve the communication (face-to-face meetings) and arrange to have it more frequent and practical. The aim is really to establish a “working relationships”. WWF is often still considered as a funder by partner. Decision making needs to be participative.
- In addition to all those above mentioned stakeholder consultation and engagement, our FPIC approach will need be reinforced at the level of the Biosphere Reserve (through workshops, information campaigns at community level). We need also to undergo the sharing and consultation of our next period (2021-2025) landscape strategy with local stakeholders.
- In parallel to consultation with partners, for implementing partners of specific project, capacity enforcement gap and needs are identified, and an agreed capacity enforcement plan developed (ex: CSO advocacy plan and CSO capacity enforcement plan, law enforcement capacity enforcement needs with regards to wildlife traffic ...). This ensures that capacity enforcements that will be further developed meets real needs and knowledge/know-how gaps. Such a concerted plan leads to an easy adoption by local/regional beneficiaries. We will support building the technical capacity of stakeholders to implement Mahafaly seascape Programme initiatives that uphold human rights.
- It is worth to mention that the consultation process will continue during the implementation of the project, as it is an iterative process

In short, the key steps are:

- Preparation of consultation, including identification of participants., establishment of a schedule according to the convenience of the participants, analysis of the context;
- Design of tools and choice of consultation methodology;
- Conduct and Facilitation of consultations;
- Presentation of the summaries of the consultations to the participants

3.4 Indigenous Peoples and local communities

Legally, there are no indigenous peoples in Madagascar. None of the 18 Malagasy tribes can meet the universal criteria (see international law and conventions) to qualify as indigenous peoples.

We recognize populations at the village level as local communities. And within the framework of this project, local communities and the Malagasy population will be represented by the CSOs and CBOs. CSOs and CBOs are their spokesperson.

In the broad sense of the term, local communities are the Malagasy populations who live in geographical areas outside the administrative districts of the administrative districts (Region / District / Commune). These communities live together in the same territory. At the level of the structure of Malagasy society, there is also value such as "Fihavanana" or "Ziva" which strengthens this coexistence between each member of the community even if there are different ethnics. So, the term "local community" here refers to the entire population of different social categories but who live in harmony in the same well-defined land (fokonolona). And the level of vulnerability does not really depend on category but rather on the activity of each member of the community.

3.5 Disadvantaged or Vulnerable Groups

In the case of disadvantaged and vulnerable groups, WWF MDCO has to ensure that they are duly and timely consulted, making sure that their concerns are heard, taking into account individuals' and communities' specificities, and delivered in an appropriate form, manner and language. In some cases, special efforts must be made to ensure that disadvantaged or vulnerable members have access to consultation events or discussion forums. As with other stakeholder groups, the type of engagement should be commensurate, to the potential level of risks/ impacts associated with the Project.

- In the Biosphere Reserve, vulnerable groups represent voiceless people who may not be able to access to project information, articulate their concerns and priorities about potential project impacts and lodge official grievance, take opportunities unveiled by the project and participant in various benefit sharing activities of the project due mainly to a number of barriers. Lower social status (young couple, young in general can't engage in in debates in public), poverty (elderly, migrants), illiteracy are among the most frequent barriers. One visible example in the Biosphere Reserve patriarchal society, women (housewife, female head of household, teen age mother), are not expected to speak out and engage in debates in public. Major factors of vulnerability are then related to gender.*
- Underrepresented people (climatic migrants) composed from farmers from inland (ethnic minorities as they are different ethnic; "tagnalana" compared to the coastal area people "vezo") are vulnerable groups and have difficulty in engaging with the project stakeholder consultation process.*

Those vulnerable groups may be affected by the project activities with resources access restriction, linked with management tools (MPA, LMMA, temporary fishing reserve established through the project)to preserve the Biosphere Reserve natural resources (fisheries, reef and lagoons ecosystems).

The majority of those vulnerable groups have only one source of livelihoods, and mainly depending on fishery resources extraction (near shore resources). Women and inland farmers can't access offshore fishing ground as they don't have the experiments for such fishery systems, elderly and poor young people don't have the mean (vessels) to access also more open fishing grounds.

Against this background, the project will implement a number of measures, as described below to ensure full and effective participation of vulnerable groups in project related consultations.

- Women focused groups: The project will facilitate formation of a focus group for women, which will be led by a female facilitator, and will provide a platform to discuss any issues and concerns that*

the women may have regarding the Project development. This will particularly ensure that female farmers/entrepreneurs have the opportunities to participate in and benefit from the project. The E&S team will hire a woman as the facilitator and will keep record of issue of discussions in the meeting of such group. The project teams will put maximum efforts to address the genuine concerns of the women group.

- For the mobilization of women, the project will optimize existing local resources and structures such as the grouping of women beneficiaries of other projects, such as humanitarian projects and social protection projects, such as the "Leading Mother approach". Indeed, the exploitation of the Leading Mother approach could contribute to changing the behavior of women in the areas of intervention of the Project. These women can then facilitate the introduction of other women considered vulnerable.
- For elderly, ethnic minorities, migrants and socially excluded people the contribution of clan leaders and traditional authorities will be solicited to facilitate the approach of these groups.
- Household visits: project will give priority to individual household visits, particularly those that are in absolute poverty, female headed households, people with disability, the elderly who have mobility difficulties, and poor migrants households to ensure they are aware of Project developments. During the visits, the targeted households can also raise questions and concerns freely without intimidation, discomfort or ridicule.
- For young people, within the framework of this BAF Project it consists in aiming for the inclusion of young people for an improvement in economic opportunities.
- Consultations in local language. The E&S field team, when necessary, will hold small group meetings to explain printed disclosure materials for people who are not literate They will also assist those groups in how to provide comments, feedback and raise grievances.
- Consultations in appropriate manner: While reaching out to different groups particularly vulnerable groups such as women, elderly and disabled, the project teams will make sure time and location of consultation are appropriate to their needs.
- In addition, the teams will make sure that all the vulnerable groups are adequately informed about the consultations at least one week prior to the schedules date.
- School visits: Project will conduct school visits to disseminate Project information and consult with students and teachers about potential impacts and benefits. Such initiatives will also be used as an opportunity to share project-related information to schoolteachers and students, which the project believes is an effective way to reach out the broader community, as teachers are important influencers in the community and students often bring information collected from school to share with their families.

4. Grievance Mechanism

Please refer to the Grievance Mechanism appended to the ESMP.

For WWF Madagascar Country Office (MDCO), the contact person for grievance is Mrs Bodo Rasendrasoa (People and organisation Development Manager). Address: WW Madagascar, Près Lot II M Ter Antsakaviro, Antananarivo 101, PO Box 738.

WWF MDCO put in place a grievance mechanism. WWF has a complaints management and resolution procedure based on the principles of accessibility, inclusiveness, transparency, accountability and confidentiality.

Accessibility: In order to ensure the availability of a non-discriminatory mechanism, WWF will make available to complainants, especially local communities, three entry points (Telephone, letter on plain paper, e-mail) allowing them to submit their complaints.

Inclusiveness: each complaint will be handled by a committee. The handling of complaints relating to WWF's activities will be carried out in an inclusive manner, and while ensuring consultation with all parties concerned.

Transparency: The complaints management and resolution mechanism will be shared with the public via various media / information resources /communications (WWF website, leaflets information, information sessions /sensitizations).

All grievances and how they have been managed will be recorded in the Stakeholder Engagement Management Plan including complaint details, a summary of the grievance, the resolution or agreement on proposed actions (between the Project and the complainant), and monitoring actions taken in response to the grievance.

The project team will inform the implementing partners, the beneficiary municipalities, the beneficiaries, the community at the level of the beneficiary Communes as well as all the actors working with the Project on the existence of this Grievance Mechanism before and during the entire duration of the Project. In this sense, we will mobilize all available means and channels of information and communication (posters, written media, audio-visual media, internet, social networks, public meetings, etc.). Public information focuses in particular on the existence of a permanent procedure for collecting complaints as well as the way to file a complaint.

5. Stakeholder Register

Table 2 (Engagement to date) in Annex E.1 (Tab 2) can be updated to function as a stakeholder engagement register. The Project's Stakeholder Register is essentially a database that records on-going stakeholder engagement activities, including specifics of the engagement activities, any issues raised by stakeholders requiring follow-up (Tab 2, Table 2, Column F "issues discussed, and information disclosed"), follow-up actions, and the status of these actions. The Stakeholder Register can also be extended to document additional information, if necessary. Where many stakeholders raise similar issues, these can be grouped as "issues" and responses to them will be tracked together in a separate section of the register.

6. Monitoring, Evaluation and Reporting

WWF MDCO will update the SEP through the lifetime of the project, in particular whenever there have been changes to the project, additional stakeholder activities or when particular milestones (e.g., agreements with communities) have been reached.

Systematically, the stakeholders mapping is reviewed every 6 months (beginning of calendar year in January, and beginning of fiscal year in July).

Monitoring of Stakeholder Engagement Activities

Monitoring and reporting of stakeholder engagement activities will help the Project track issues/ concerns, thereby providing an understanding of trends which will help pre-empt risk management activities. Furthermore, by monitoring and evaluating the Project's performance with regard to stakeholder engagement will allow for its efficacy to be evaluated and improved where necessary.

- *Stakeholder engagement process Monitoring : following each and every stakeholder engagement activity, the E&S team will assess the usefulness and effectiveness of the meetings by using a feedback evaluation form. The feedback and comments made by the participants will be carefully examined and appropriate reforms will be made in future engagement activities to increase their effectiveness.*

Stakeholder engagement overall performance will be reviewed on an ongoing basis to determine the effectiveness of the SEP, including the methods of engagement being used, their outcomes and the accuracy of the mapping results. (example of Performance Indicators used: means of informing the affected people and stakeholders, comments received on disclosure materials,

positive or negative, nature of participation in terms of gender, attendance rates, number and type of grievances lodged by stakeholders).

- *Projects should update the stakeholder register and planned engagement (Tabs 2 & 3) regularly, and at least on an annual basis. Through updating the register, the project can track some basic indicators which are commonly used to monitor and evaluate the effectiveness of a Project's stakeholder engagement programme, including:*
 - *List of stakeholder events/ activities carried out during the reporting period and the stakeholders targeted (this can be combined with photographs) - this can be tracked through updates to Annex E.1, Tab 2 (Engagement to date);*
 - *Number of participants at each event/ activity (disaggregated by gender) - this can be tracked through updates to Annex E.1, Tab 2 (Engagement to date);*
 - *Percentage of ICP or FPIC engagement activities undertaken during the review/ reporting period- - this can be tracked through updates to Annex E.1, Tab 2 (Engagement to date), or referencing the FPIC Protocol steps completed.*
 - *Percentage of follow-up actions addressed/ completed during the reporting period, percentage still open - this can be tracked through updates to Annex E.1, Tab 2, (Engagement to date);*
 - *Proportion of year's planned stakeholder engagement completed during the reporting period - this can be tracked through updates to Annex E.1, Tab 3 (Planned engagement).*

Stakeholder engagement process report : in parallel with stakeholder mapping review, the E&S team will prepare a half-yearly SEP Implementation Report, highlighting lessons learning.

The semestrial and annual review will provide a periodic opportunity to review the stakeholder mapping results to ensure that the mapping results are still accurate. It will also provide an opportunity for the project to make required corrections if deviations are found the initial mapping.

- **Reporting back to stakeholders :**
Effective implementation of community engagement is vital for building trust and respect with stakeholders. Letting affected people and interested parties know what has happened with the feedback provided during consultation, the importance of their contribution to the project, and what the next step will be, is not only a good practice, but also a common courtesy.

Reporting back is crucial in convincing the stakeholders that the project is serious about the complaints lodged by local community and the grievance mechanism, put in place by the project, indeed works.

The process of reporting back to the stakeholders will be conducted in the following ways:

- *Issues and Response Reports to be disclosed with the draft ESMP. The report will provide summary stakeholder engagement activities undertaken to date, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account or the reasons why it was not.*
- *Updated Issues and Response Report to be disclosed with the final ESMP incorporating any feedback received during the Draft ESMP consultation phase and how the feedback has been considered in the Project designs and decisions.*

9. Annex E.1: Stakeholder Engagement Plan Template

See attached Excel spreadsheet which has been designed to help Blue Action Fund applicants and grantee organisations organise, manage and document their stakeholder engagement process. Tables/ Figures can be presented in a Word document or other format if needed.