



## **IMO STATE**

**FRAMEWORK FOR RESPONSIBLE AND INCLUSIVE LAND INTENSIVE AGRICULTURE**

**(FRILIA)**

**STAKEHOLDER ENGAGEMENT TOOLKIT**

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## Acronyms and Abbreviations

ESIA	Environmental and Social Impact Assessment
FPIC	Free, Prior and Informed Consent
FRILIA	Framework for Responsible and Inclusive Land Intensive Agriculture
GBV/SEAH	Gender-Based Violence or Sexual Exploitation Abuse, or Harassment
IAP	Investment Approval Process
LGA	Local Government Authorities
MDA	Ministries, Departments and Agencies
MoU	Memorandum of Understanding
SE	Stakeholders Engagement
SEP	Stakeholder Engagement Plan

# 1. Introduction

Effective Stakeholder Engagement (SE) is key to implementing a Framework for Responsible and Inclusive Land Intensive Agriculture (FRILIA), and when properly done it:

- Improves communication among stakeholders.
- Minimizes the potential for conflict.
- Promotes investment project acceptance and participation.
- Enhances the likelihood of overall project success.

This Stakeholder Engagement Toolkit outlines the procedures and tools for stakeholder engagement under FRILIA. It incorporates existing communication channels and explores ways for investment project stakeholders to participate in responsible and inclusive land-intensive agriculture investments, based on their level of interest and influence. It provides guidance for community consultation and engagement throughout the six (6) stages for agricultural investment under the Imo State Investment Approval Process (IAP), from initial enquiry to aftercare. The toolkit guides investors and implementation agencies to:

- Develop a framework for stakeholder engagement that:
  - Identifies investment project stakeholders.
  - Analyses stakeholder interests, influence, roles, and responsibilities.
  - Understands the relationship between the stakeholders and guides appropriate alignments within the investment process to deliver responsible and inclusive outcomes.
- Develop a strategy and plan that defines pathways for effective communication for enhanced and inclusive participation.

In addition to this toolkit guide, related templates are provided to assist the investor and relevant MDAs in developing and implementing this framework.

It is important to note that this toolkit applies to two broad investment scenarios. The first is where the government has previously acquired land and is considering providing it to the investor. The second option involves the investor directly acquiring land from local landowners or land users. While stakeholder engagement is essential in both cases, it is likely to be more challenging and time-consuming under the second scenario, as the investor and the community will lead the agreement with little involvement from the responsible MDA or local government at the initial stage. This reinforces the objective of this Toolkit, which is to provide stakeholders with guidance in navigating the investment project lifecycle.

## 2. FRILIA Principles Applicable to Stakeholder Engagement

The FRILIA principles most applicable to stakeholder engagement are as follows:

- Investments should occur transparently (Principle 1.2).
- Investments should be subject to consultation and participation, including the disadvantaged and vulnerable, informed of their rights and assisted in their capacity to negotiate (Principle 1.5).
- Communities have the opportunity and responsibility to decide whether to make land available based on informed choices (Principle 1.6).
- Investment should be monitored (Principle 1.7).
- Compensation standards are to be disclosed and applied consistently (Principle 3.1).
- Economic and social impacts caused by land acquisition or loss of access to natural resources shall be identified and addressed, including people who may lack full legal rights to assets or resources they use or occupy (Principle 3.2)
- Offer displaced land-based earners replacement land if available (Principle 3.6).

Together, principles 1.5 and 1.6 adopt the international concept of “**Free, Prior and Informed Consent**” (FPIC). This principle states that any investment affecting the land or resources of indigenous peoples should not proceed without the free, prior, and informed consent of the individuals directly affected by the proposed investment project.

Under FRILIA, FPIC is not limited to indigenous peoples but applies to all communities whose land may be affected by a proposed investment. Thus, principle 1.6 gives affected communities a veto (the right to say no) to an investment project being implemented in their territory. This power may extend over the lifetime of the investment project if the nature or scope of the investment changes over time.

The four elements of FPIC can be described as follows:

**Free:** Those deciding whether to consent to a project should do so without coercion, intimidation, or manipulation.

**Prior:** Consent must be sought well in advance of any authorization or the commencement of project activities. The timetable must allow sufficient time for culturally appropriate consultation and for completion of local decision-making processes.

**Informed:** People receive all relevant information about the project. The information provided must be objective, accurate and presented in a manner or form that is understandable to those receiving it.

**Consent:** The people have agreed to the activity that will take place on their land. The right to consent includes the right to say no to the project or to offer to consent only under certain conditions.

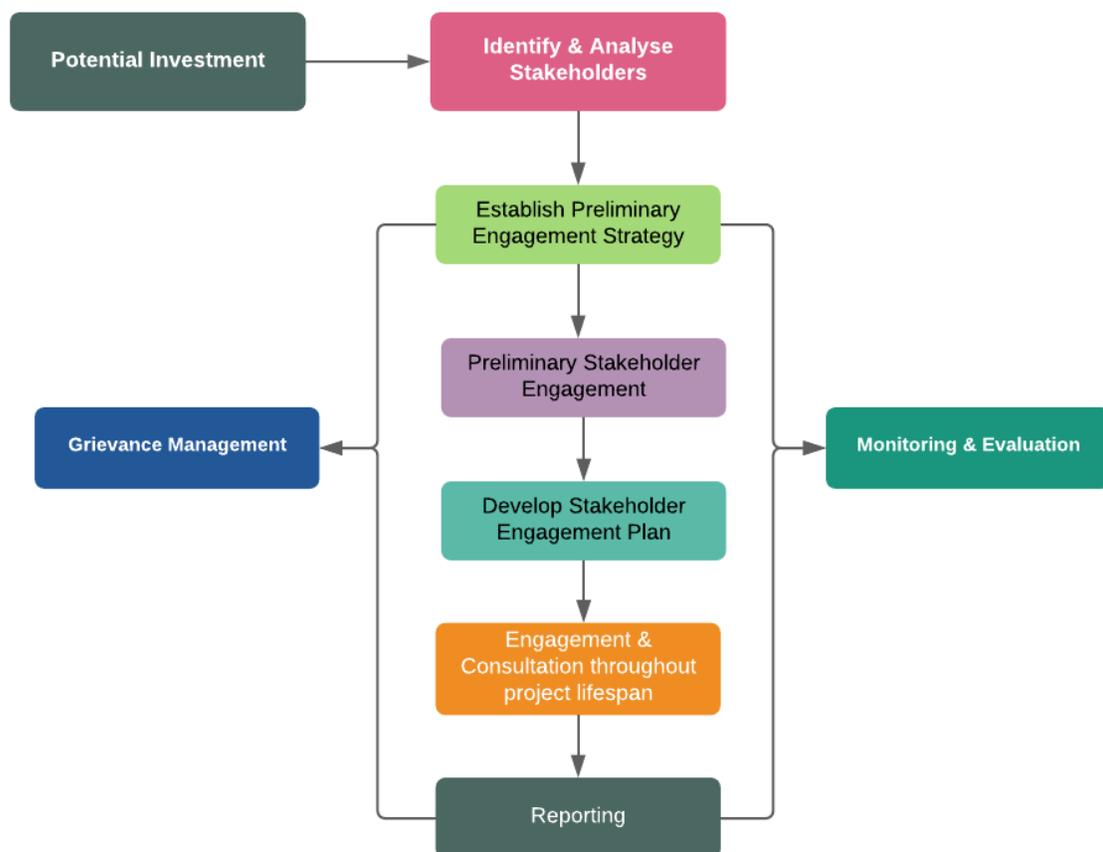
### 3. Stakeholder Engagement Plan

A Stakeholder Engagement Plan is used to identify the stakeholders of a project and how they will be constructively engaged throughout the project lifecycle. It seeks to ensure that there is a positive relationship between the investor and its stakeholders and helps to manage project risks.

A Stakeholder Engagement Plan is a living document that needs to be reviewed and constantly updated throughout the project lifecycle to reflect any project changes.

Generally, and as explained below, a stakeholder engagement plan should include the steps reflected in this graphic:

**Figure 1: Steps for stakeholder engagement Plan**



### 3.1 FRILIA Investment Approval Process (Imo State One Stop Investment Center (OSIC-IAP))

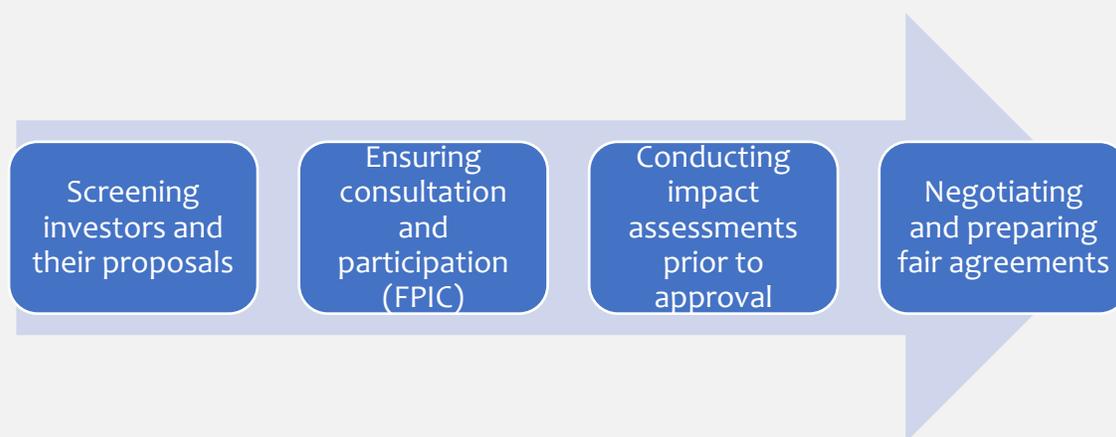
The toolkit also guides community consultation and engagement throughout the SIX (6) stages of Imo State’s FRILIA agricultural investment approval process, from “Initial Inquiries & Know Your Customer (Due Diligence) Assessments” to where “The parties enter into Final Agreements”.

1. **Stage 1: INITIAL INQUIRIES & KNOW YOUR CUSTOMER (DUE DILIGENCE** – The investor reaches out to Imo State One Stop Investment Center (ISIPA Coordinated center) with the intention to invest in Imo State. The Imo State One-Stop Investment Center (ISIPA Coordinated center) communicates the FRILIA toolkits to investors via the channels outlined in the FRILIA Communication Strategy.
2. **Stage 2: [Information Exchange & Site Visits]** – A. Imo State One Stop Investment Center, through the One Stop Investment Centre, continues to provide information and resources the potential investor may need to proceed with the investment. Also coordinates the investor’s interaction with other government agencies and assists the investor in locating service providers. B. The Ministry of Lands and the Ministry of Agriculture arrange for site visits for the investor after notifying local officials and communities of investor interest. C. Ministry of Lands and Ministry of Local Government Affairs notifies local government officials, other ward and community stakeholders to engage in internal consultations and then to respond preliminarily whether they might welcome the investment.
3. **Stage 3: [Potential Investor Proceeds or Withdraws]** – A. The investor reacts to the community’s initial response to the potential investment and their own assessment of the investment's viability and the potential site. If the investor decides to withdraw, the process stops. If the investor wishes to consider a different location within the State, the process reverts to Stage 2. The process also ends if the community decides not to proceed. B. If the potential investor decides to proceed and the community is supportive, the investor should engage further, build relationships with the community and get them fully involved. The investor and the community (with legal assistance provided by Imo State Ministry of Justice and Community Legal Council should begin to discuss a community engagement plan to guide the ongoing consultations.
4. **Stage 4: [Investor Enters into a Memorandum of Understanding (“MoU”) with Imo Investment Promotion Agency, Ministry of Lands, Ministries of Agriculture and Representatives of the Affected Communities]** – A. Imo State One Stop Investment Center does more in-depth due diligence on the investor and the Imo State One Stop Investment Center shares additional due diligence findings with other stakeholders. B. Consultations with the community continues and a community engagement plan

may be agreed to at this point. C. If all parties continue to be supportive of the proposed investment, they attempt to agree on an MoU that covers the framework of the investment, how much land is required, benefits that may accrue to the community, commitments to ongoing consultation, preparation of an ESIA, etc. The MoU does not legally commit any party to a final agreement on the proposed investment.

5. **Stage 5: [Investor Completes and Shares a Feasibility Study, Business Plan and an independent Environmental and Social Impact Assessment (ESIA)]** – A. Imo State Ministry of Environment makes its determination whether the ESIA is acceptable and notifies the investor within 14 working days of receiving it. B. If not already completed, a community engagement plan should be finished in this stage. C. Land lease discussions can continue (if begun in a previous stage) or begin. Leases should not be finalized and signed until Stage 6.
6. **Stage 6: [The parties enter into Final Agreements]** – The final agreement is likely to be contained in several individual agreements or could be combined into one document. While the precise requirements will vary, approved investment is likely to include some or all of the following:
  - Land lease agreement
  - Outgrower contract(s)
  - Community impact and benefit agreement
  - Community engagement plan
  - Monitoring plan

**Box 2: An investment approval process should include the following components.**



- Inclusive, accessible and equitable dispute resolution mechanisms

Once the project is in place, the responsible MDA should ensure that a proper monitoring and evaluation process is in place and implemented.

### 3.2 Stakeholder Identification

Stakeholder identification is a crucial process that involves identifying all parties whose actions or inactions may affect or be affected by the activities of an investment project. To identify the relevant stakeholders, the following questions must be answered:

1. Who is affected positively by the activities of the investment project?
2. Who is affected negatively by the activities of the investment projects?
3. Who can influence the investment project's outcome/deliverables?
4. What regulatory bodies are concerned with the activities of the investment project?

The Imo State One-Stop Investment Centre (ISIPA Coordinated centre) should engage with investors and the local community to identify stakeholders and facilitate initial stakeholder meetings. Responsible parties can make use of Table 1 in the subsequent section. Note that additional stakeholders may be identified as project development progresses.

#### Box 3: Sample list of stakeholders

- Affected and potentially affected stakeholders living on the land, including landowners, tenants, and other land users.
- Landowners not living on the land.
- Stakeholders who are affected by resources that will be affected by the investment e.g., using the water upstream.
- Community members, e.g., head of village, school committee, workers, and others in the community, etc.
- Specific vulnerable groups, e.g., women, migrants, etc.
- Local authorities and government officials
- Ministries, Departments and Agencies (MDAs)
- NGOs and/or CSOs who may work with the community.

### 3.3 Stakeholder Categorization

In developing a stakeholder engagement plan, it can be helpful to group the stakeholders into categories as the consultation content and methodology may be the same for those falling into the same category or differ across categories.

#### Box 4: List of Potential Stakeholder Categories

- State-level MDAs
- Local government authorities
- Landowners and land users
- Traditional authorities
- Vulnerable groups
- NGOs and CSOs
- Investors
- Farmers
- Actual or potential employees and labour unions

In Imo State, the responsible multi-stakeholder committees and MDAs are :

- Imo State FRILIA Steering Committee
- Imo State FRILIA Technical Committee
- Imo State FRILIA Project Implementation Unit
- Imo State Ministries of Agriculture
- Imo State Ministry of Local Government & Chieftaincy Affairs
- Imo State Ministry of Environment and Natural Resources
- Imo State Ministry of Justice
- Imo State Ministry of Water Resources
- Imo State Ministry of Women Affairs & Vulnerable
- Imo State Ministry of Youth & Talent Hunt
- Imo State Ministry of Budget, Economic Planning and Statistics
- Imo State Ministry of Lands, Survey & Physical Planning
- Imo State Ministry of Commerce, Trade and Investment
- Imo State One Stop Investment Center (ISIPA Coordinated center)
- Imo State Internal Revenue Service
- Imo State Local Government & Chieftaincy Affairs
- Imo State Geographic Information System
- Office of the State Surveyor General
- Imo State Bureau of Public Private Partnership

Other MDAs may be included depending on the nature of the agricultural investment project.

The relevant local government authorities are:

- Imo State Ministry of Local Government Affairs
- Imo State Department of Chieftaincy Affairs
- Imo State Local Government Area

Other Local Government authorities may be included depending on the nature of the agricultural investment project.

### 3.4 Stakeholder Analysis

Having identified the stakeholders, it is necessary to analyse them. This includes a clear identification and description of each stakeholder (there often will be many in each category), their interest or stake (both positive and negative), and their specific role or responsibility.

Stakeholders have an interest in an investment project if they are likely to affect or be affected by a project. The level of interest is determined by the magnitude of the effect they have on the investment project, or the investment project has on them. See Table 1 and Figure 3.

**Table 1: Stakeholder Groups in Imo State.**

STAKEHOLDER CATEGORY	STAKEHOLDER	INTEREST	LEVEL OF INTEREST	ROLES AND RESPONSIBILITIES
State FRILIA Steering Committee	All members of the Steering Committee established by Executive Order	Support Imo State One Stop Investment Center with key decision – making at government level	High interest-high influence	In charge of the overall coordination of the establishment, adoption and implementation of Imo State Framework for Responsible and Inclusive Land-Intensive Agricultural Investment
State FRILIA Technical Committee	All members of the Technical Committee established by Executive Order	Support Ministry of Lands and Ministries of Agriculture with the implementation of FRILIA	High interest-high influence	In charge of the development of Imo State Framework for Responsible and Inclusive Land-Intensive Agricultural

STAKEHOLDER CATEGORY	STAKEHOLDER	INTEREST	LEVEL OF INTEREST	ROLES AND RESPONSIBILITIES
				Investment, prepare FRILIA implementation Plan and perform other mandate as directed by the Steering Committee
Federal Ministries, Departments and Agencies (MDAs)	Federal Ministry of Environment, Federal Ministry of Agriculture,	Support Imo State Ministry of Environment with the implementation of Imo FRILIA Environmental and social risk management toolkit	Low interest – high influence	In charge of the Imo FRLIA Environmental and Social Risk Management approval
State Ministries, Departments and Agencies (MDAs)	Imo State: Ministry of Lands, Ministries of Agriculture, Ministry of Justice, Ministry of Commerce, Office of the State - Surveyor General, Imo State Geographic Information Agency, Ministry of Local Government Affairs, Ministry of Finance, Department of Chieftaincy Affairs, State Bureau of Public Private Partnership, State Boarder Commission, Investment Promotion Agency, Land Use and	Support Imo State Ministry of Lands with the development and dissemination of FRILIA toolkit, FRILIA Communication Strategy and GRM	Low interest-low influence	In charge of the implementation of Imo FRILIA toolkits

STAKEHOLDER CATEGORY	STAKEHOLDER	INTEREST	LEVEL OF INTEREST	ROLES AND RESPONSIBILITIES
	Allocation Committee			
Traditional authorities	The Chairman, and members of Imo State Council of Traditional Rulers	Support Ministry of Lands with Defining structures and human resource within the local community for the project Implementing	High influence – low interest	Assist in the identification of stakeholders and arrange other initial meetings with the broader community
Local businesses	Agro value chain businesses	Support One Stop Investment Center with the provision of suitable business partners to drive the project	Low influence – low interest	In charge of sourcing local partners for the project
Project affected persons (women, men, sub-groups (e.g., pastoralists))	Land Title owners, Families	Support Ministry of Lands with provision of land for the project	High Interest – low influence	In charge of the provision of land for project
Local Government Departments and Agencies	Ministry of Local Government & Chieftaincy Affairs	Support Ministry of Lands with intervention design as well as the evaluation of project on behalf of communities	High Influence – low interest	In charge of intervention design as well as the evaluation of project on behalf of communities
NGOs and CSOs	Community base NGOs and CSOs	Support One Stop Investment Center to create awareness and mobilization of direct and indirect beneficiaries	Low interest – low influence	In charge of creating awareness and mobilization of beneficiaries
Development partners	Investors and lenders	Support One Stop Investment Center with the project funding and	Low influence – high interest	In charge of the Project funding and technical support

STAKEHOLDER CATEGORY	STAKEHOLDER	INTEREST	LEVEL OF INTEREST	ROLES AND RESPONSIBILITIES
		strategic assistance		
Media	Imo Broadcasting Corporation, and others	Support Ministry of Information and Ministry of Lands to reach out to all stakeholders with the information dissemination about the project	Low interest-low influence	In charge of information dissemination

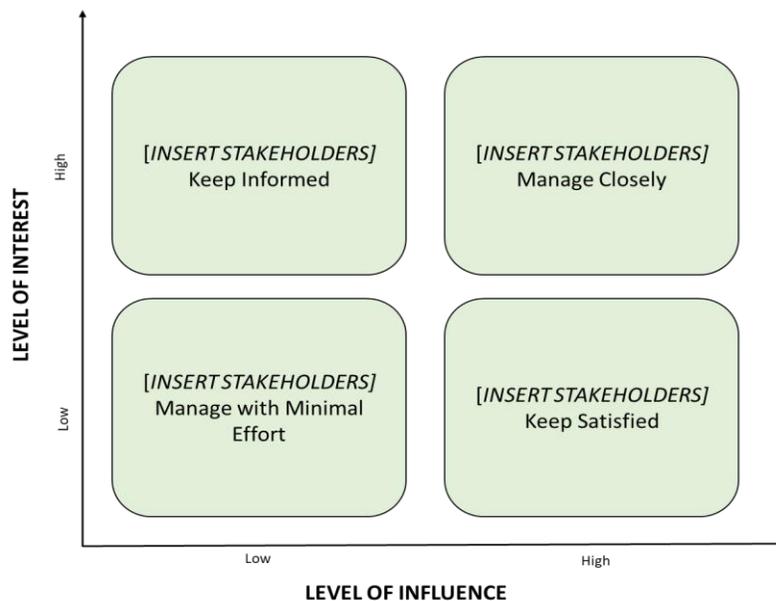
### 3.5 Stakeholder Mapping

Stakeholder mapping is the process of understanding the relationship between stakeholders and how to manage them. A stakeholder map shows a visual representation of identified stakeholders categorised by their interest and influence in the investment project. A stakeholder map is the first stage to managing stakeholders as it gives a clear understanding of how investment project proponents need to communicate with stakeholders.

A stakeholder matrix (see *Figure 3*) is one of the tools used in stakeholder mapping. Stakeholders are placed into four quadrants:

1. Low interest – low influence: **Manage with Minimal Effort (Monitor)**. These stakeholders have minimal impact on the investment project, and their level of engagement is usually limited to information disclosure.
2. Low interest- high influence: **Keep Satisfied**. This group of stakeholders require regular updates on the investment project to maintain their interest in the project and to incorporate their feedback into investment project decision making.
3. Low influence- high interest: **Keep Informed**. These stakeholders often require that their needs are met and there is constant communication about investment project decisions.
4. High interest- high influence: **Manage Closely**. These stakeholders have control over the project and make key investment project decisions. They need to be engaged constantly throughout the investment project lifecycle.

**Figure 3: Stakeholder matrix**



Organizing stakeholders into primary, secondary, and tertiary groups involves prioritizing them based on their level of influence, interest in the project, and the extent to which they are affected by the project. Here is a general guideline to help you categorize stakeholders into these groups:

**Primary Stakeholders:**

High Influence, High Interest: These stakeholders have a significant impact on the project and are actively involved or invested in its success. They often include direct beneficiaries, key decision-makers, and primary funders.

**Secondary Stakeholders:**

High Influence, Low Interest: These stakeholders have the potential to influence the project but may not be directly affected by it or have a lower level of interest. They could include regulatory bodies, industry associations, or influential community leaders.

Low Influence, High Interest: Stakeholders with a high level of interest but limited influence on the project fall into this category. They are typically concerned citizens, advocacy groups, or local organizations.

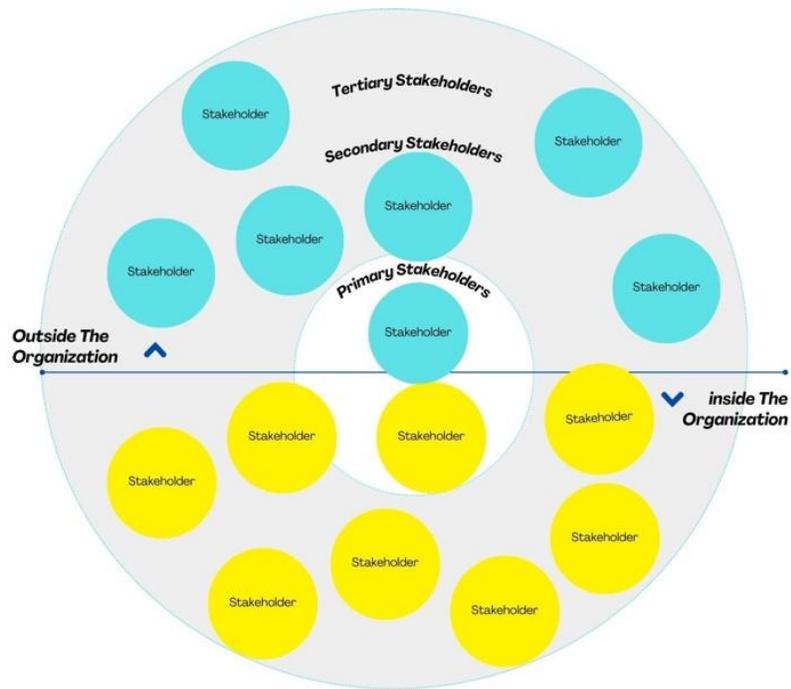
**Tertiary Stakeholders:**

Low Influence, Low Interest: These stakeholders have minimal influence on the project and low interest in its outcomes. They could be the general public, distant communities, or individuals with indirect connections to the project.

**Figure 4: Stakeholder map**

# Stakeholder Mapping

Project Name or Topic



## 4. Stakeholder Engagement

Stakeholder engagement begins early in the investment process and should continue for the entire life of the investment project. It is one of the essential elements of a responsible and successful investment in agriculture. The principles of FPIC (as described above and pursuant to FRILIA principle 1.5) should be followed at all times.

Stakeholder engagement should be guided by a Stakeholder Engagement Plan (SEP). The following elements should be included in every SEP in Imo State:

1. Initial stakeholder engagement
2. Key message document
3. Engagement with the LGA
4. Description of the methods to be used to engage with each stakeholder group.
5. The specific stakeholder activities to be utilized throughout the project lifecycle.

### 4.1.1 Initial Stakeholder Engagement

Initial community engagement by the investor and, Ministry of Lands in company with Ministries of Agriculture and representative from Investment Promotion Agency, may occur during the stakeholder mapping process. If not then, initial engagement should begin soon after stakeholder mapping has been completed. Note that all stakeholder engagement conducted throughout the project lifecycle must be recorded in the form of meeting minutes and/or pictures, videos, audio recordings, etc. Records of the initial stakeholder engagements will be required for the development of a Stakeholder Engagement Plan.

## **4.1.2 Key Message Document**

The investor may wish to draft a short document containing the key information about the investment project to be disseminated to affected persons, government officials/agencies, and other stakeholders. This “key message” document should be written in simple English (translation to the local language may be required for some communities) and should ideally not exceed one page (see **Annex 1**). It should include:

- A concise but clear description of the investment project, including project background and components, including timeframe.
- A clear description of the investment project proponents or consultancy undertaking the consultations.
- Description of the intended activities to be carried out and highlights of possible impact (positive and negative – in the case of the latter, mitigation/adaptation mechanisms to be considered should be mentioned).
- Description of the anticipated mode of stakeholder engagements.
- A statement of assurance of adherence to good practices, professionalism, and protection of community rights.

## **4.1.3 Engagement with LGA (where applicable)**

In most cases, the Local Government Authorities (LGA) will have some involvement in assessing, overseeing or monitoring the proposed investment. Communities have a close relationship with the LGAs in Imo State, so it is important to engage and consult them in addition to engaging directly with the community members. Thus, it is important that Ministry of Lands in collaboration with Ministries of Agriculture and One Stop Investment Center and the investor have a plan to engage with the LGAs. Doing so can help the investor to:

- Properly introduce the investment project to the LGA.
- Effectively Communicate objectives, goals and impacts of the investment project to the LGA.
- Understand local government regulations specific to the investment project.
- Garner the support of the local government in the development of the investment project.

The investor can use the content of the key message document (see Annex 1) in drafting a letter to the applicable LGA. This should lead to follow-up meetings and other communications with LGA officials.

## **4.1.4 Initial Engagement with the Community**

Engaging with the affected community throughout the investment approval and implementation process is essential to a successful investment. Thus, from the earliest stages, the investor should utilize a robust process of consultation and participation with the community aimed at obtaining their free, prior and informed consent (FPIC).

Because no two communities are exactly alike, the initial approach by the Ministry of Lands and the investor can vary. In most cases, it is important to identify key community stakeholders such as community leaders/traditional authorities, interest groups and other people who have current information about the community and may be seen as leaders. Communication with these leaders often should be done through a face-to-face meeting to introduce the investment project and the project proponents or representatives. The community leaders can then assist in the identification of stakeholders and arrange other initial meetings with the broader community. It should be noted that some communities have customs and traditions that need to be respected during community engagements to elicit support from community leaders and prevent hostility and grievances.

#### 4.1.5 Methods to be used in Engaging with Each Stakeholder Group

There are many stakeholder communication methods, not all of which are appropriate for each stakeholder group.

The following table details various communication methods which may be considered:

**Table 2: Stakeholder communication methods**

METHOD	DESCRIPTION
Townhall Meetings	These are large meetings that are convened in the community to inform the community members, mainly for information disclosure. It is used to inform the community about the investment project status and progress.
Focus Group Discussions	These are engagements conducted with different stakeholder groups to discuss topics of similar interests. At the community level, this can be gender-segregated (male and female groups), age-segregated (youth and adults), limited to those engaging in certain livelihoods, etc. Discussions usually follow themes that are discussed, with multiple participants sharing their views and opinions.
Key Informant Interviews	This is a method of engagement that involves consultation with persons that have authorial knowledge about issues to gain an in-depth understanding and collect information.
Workshops	These are meetings designed for stakeholders to work together to share views and opinions. They are often participatory with the aim of either sensitising stakeholders, finding solutions to problems or consultation for decision making.
Media Broadcast	This is the use of print media, radio or television to convey information about the project to a wider audience.
Notice Boards	These are information boards set up at vantage points to disseminate information to the general community.
Letters and Emails	This is a written and typed mode of communication which can be used to introduce the investment project to Government stakeholders, traditional leadership and others. A sample letter of intent is provided in Annex 2.

Surveys	This is the use of structured and semi-structured questionnaires to collect data from a defined group of people.
Project Information Document	A high-level project brief provided to MDAs, traditional leaders and others during project inception.
Infographics	Visual representation of project details presented in a simple, clear and linguistically appropriate manner.

An important aspect of planning for stakeholder engagement is determining which communication method will work best for each stakeholder. That can be done using a table such as the one in Table 3:

**Table 3: Communication methods applicable to each stakeholder group**

STAKEHOLDER GROUP	COMMUNICATION METHOD	DESCRIPTION
Federal Ministries, Departments and Agencies (MDAs)	Letters	Introduction of Investment Project to government stakeholders and level of participation/support required
State Ministries, Departments and Agencies (MDAs)	Direct meetings, workshops, key informant interviews	Facilitate project entry in collaboration with other nongovernment stakeholders
Traditional authorities	Direct meetings; townhall meetings, key informant interviews, infographics	Introduction of project to local communities
Local businesses	Letters, townhall meetings, media broadcast	
Project affected persons (women, men, sub-groups (e.g., pastoralists))	Townhall meetings; focus group discussions, infographics, noticeboard, media broadcast etc. (Note the possible need for women-only meetings.)	
Local Government Departments and Agencies	Letters, meetings, key informant interviews	
NGOs and CSOs	Letters, townhall meetings	
Development partners	Letters, townhall meetings, media broadcast	

Media	Townhall meetings, Media broadcast	
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#### 4.1.6 Special Considerations for Gender and Vulnerable Groups

In every community, there are people who are disadvantaged or vulnerable and need special consideration or attention to ensure their participation in investment project decision making and outcomes.

Thus, one section of the SEP should identify and describe vulnerable groups and the special measures that should be taken to ensure they are engaged, their concerns and opinions entrenched in investment project decision making. For example, it may be necessary to have separate meetings with women to ensure their voices are heard. The section will also describe the steps the investment project will take to ensure project representatives who work in the community do not trigger any Gender-Based Violence or Sexual Exploitation Abuse, or Harassment (GBV/SEAH).

#### 4.1.7 Engagement Activities in each Phase of Investment Project Development and Implementation

The SEP should describe the engagement activities to be undertaken in each phase of investment project development and implementation and be aligned with the steps in Plateau state’s IAP as set forth in Table 4.

**Table 4: Stakeholder engagement activities in investment project phases**

INVESTMENT PROJECT PHASE (PER IAP)	STAKEHOLDER	ENGAGEMENT ACTIVITY	IMPLEMENTATION SCHEDULE
Initial Inquiries & Know Your Customer (Due Diligence)	<ul style="list-style-type: none"> <li>Other MDAs</li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	14 working days
Information Exchange & Site Visits	<ul style="list-style-type: none"> <li>Ministries of Agriculture, Ministry of Lands, Ministry of Local Government Affairs, investors and Stakeholders identified)</li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	21 working days
Potential Investor Proceeds or Withdraws	<ul style="list-style-type: none"> <li>Imo State Ministry of Justice, Imo State Ministry of Lands, investors and Stakeholders identified)</li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	21 working days

INVESTMENT PROJECT PHASE (PER IAP)	STAKEHOLDER	ENGAGEMENT ACTIVITY	IMPLEMENTATION SCHEDULE
Investor Enters into a Memorandum of Understanding (“MoU”) with Imo Investment Promotion Agency, Ministry of Lands, Ministries of Agriculture and Representatives of the Affected Communities	<ul style="list-style-type: none"> <li>Imo State Investment Promotion Agency Ministry of Lands, Ministries of Agriculture, investors and Stakeholders identified)</li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	21 working days
Investor Completes and Shares a Feasibility Study, Business Plan and an independent Environmental and Social Impact Assessment (ESIA).	<ul style="list-style-type: none"> <li>Imo State ministry of Environment, investors and Stakeholders identified</li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	21 working days
The parties enter into Final Agreements.	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Meetings; letters; sharing of reports</li> </ul>	31 working days

## 5. Stakeholder Engagement Budget

This section emphasises the need for a budget to fund the implementation of any Stakeholder Engagement Plan (SEP). It is important that the budgets of both the investor and responsible MDA provide sufficient funding to sustain stakeholder engagement activities throughout the lifecycle of the investment project. Depending on the existing resources, the budget will ideally cover items such as:

- Breakdown of stakeholder engagement activities as per plan and their estimated costs.
- Source of funding for implementing activities in the stakeholder engagement plan.

The budget is designed to ensure adequate funding for sustaining stakeholder engagement activities throughout the project's lifecycle.

## Box 5: Example of a Summary Budget Outline

### A. Stakeholder Engagement Activities and Estimated Costs:

#### 1. Workshops and Training Sessions:

- Estimated Cost:  $\$X$  for venue rental, materials, and facilitation.

#### 2. Community Meetings and Consultations:

- Estimated Cost:  $\$Y$  for logistics, refreshments, and facilitation.

#### 3. Surveys and Feedback Collection:

- Estimated Cost:  $\$Z$  for survey tools, data analysis, and reporting.

#### 4. Communication Materials Development:

- Estimated Cost:  $\$W$  for designing and printing brochures, flyers, and information packets.

#### 5. Technology Infrastructure:

- Estimated Cost:  $\$V$  for online platforms, software, and tools for virtual engagement.

### B. Source of Funding for the Stakeholder Engagement Plan:

#### 1. Government Allocation:

- Allocation of  $\$A$  from the state budget to support stakeholder engagement initiatives.

#### 2. Public-Private Partnerships (PPP):

- Contribution of  $\$B$  from private investors or partners for stakeholder engagement activities.

#### 3. Grant Funding:

- Securing a grant of  $\$C$  from external donors or funding agencies to supplement stakeholder engagement efforts.

#### 4. Corporate Social Responsibility (CSR) Contributions:

- Utilizing  $\$D$  from corporate entities through CSR initiatives for community engagement and outreach.

#### 5. In-kind Contributions:

- Leveraging in-kind support, such as volunteer services or donated resources, valued at  $\$E$  to enhance stakeholder engagement activities.

Total Estimated Budget:  $\$X + \$Y + \$Z + \$W + \$V + \$A + \$B + \$C + \$D + \$E$

**Note:** A more detailed budget will be required as this is only high-level to aid understanding.

This budget plan outlines the necessary funding required to sustain stakeholder engagement activities, ensuring effective communication and participation throughout the project's lifecycle. By diversifying funding sources and allocating resources appropriately, the Stakeholder Engagement Plan can be successfully implemented to foster meaningful stakeholder relationships and support project objectives.

## 6. Grievance Redress Mechanism for Stakeholder Engagement

The Grievance Redress Mechanism (GRM) is vital for effective stakeholder engagement, providing a structured process for stakeholders to address concerns, provide feedback, and seek resolution of project-related issues. The GRM aims to enhance transparency, trust, and accountability throughout the project lifecycle.

The GRM will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable, the investment project will adopt and utilise the existing GRM established for FRILIA projects in the State; adapting as needed with project-specific arrangements (see Imo State **FRILIA GRM Toolkit**). Nonetheless, the following should be considered in developing the GRM:

- The GRM is expected to address concerns promptly and effectively in a transparent manner that is readily accessible to all project-affected parties, at no cost and without retribution.
- Handling of grievances needs to be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties.
- The mechanism must allow for anonymous complaints to be raised and addressed.
- The project proponent(s) must inform the project-affected parties about the GRM process in the course of community engagements.
- The entire GRM process must be well documented to enable easy tracking and resolution of grievances.

## **6.1. Implementation of the Grievance Redress Mechanism**

### **6.1.1. Establishment of Grievance Redress Channels:**

- Set up multiple channels for stakeholders to submit grievances, such as dedicated hotlines, email addresses, suggestion boxes, and in-person meetings with a GRM officer(s)/body/committee/unit/department (as may be applicable).

### **6.1.2. Creation of Grievance Handling Guidelines:**

- Develop clear guidelines outlining the steps for submitting, processing, and resolving grievances within the defined timelines.

### **6.1.3. Appointment of Grievance Redress Officers:**

- Designate trained focal persons as Grievance Redress Officers responsible for receiving, reviewing, and resolving grievances in a timely and professional manner.

### **6.1.4. Regular Reporting and Monitoring:**

- Implement a system to document and report grievances, responses, and resolution outcomes to track trends and identify areas for improvement.

### **6.1.5. Feedback Mechanism Loop:**

- Establish a feedback loop to communicate resolution outcomes to stakeholders and provide updates on actions taken as a result of grievances to enhance transparency and accountability.

## 7. Monitoring and Reporting

### 7.1 Monitoring

This section describes how stakeholder engagement will be monitored and incorporated into the whole project monitoring or management system and how stakeholders will participate in the monitoring process. For effective cooperation, it is important to involve the stakeholders in monitoring the project's anticipated and actual impacts and obtain regular feedback on the progress made in achieving the stakeholder engagement goals, objectives and plans. The following will be described under this section:

- Monitoring indicators
- Frequency of monitoring
- Persons responsible for monitoring
- Strategy for collection of data and reporting

#### Box 6: Monitoring elements

**Indicators:** Specific measures used to assess the effectiveness and impact of stakeholder engagement efforts.

**Frequency:** How often monitoring activities will occur to evaluate stakeholder engagement activities and outcomes.

**Responsible Party:** Designated individuals or teams accountable for overseeing monitoring processes and ensuring alignment with engagement strategies.

**Strategies for Data Collection:** Methods and approaches for collecting relevant data on stakeholder interactions, feedback, and participation.

**Reporting Strategy:** How data insights and findings from monitoring activities will be documented, analysed, and shared to inform decision-making and enhance engagement strategies.

**Table 5: Examples of Monitoring Elements related to Stakeholder Engagement**

<b>S/N</b>	<b>Monitoring Dimension</b>	<b>Example</b>
1	Indicators	<ul style="list-style-type: none"><li>• Number of stakeholder engagements conducted</li><li>• Level of stakeholder satisfaction with engagement activities</li><li>• Diversity of stakeholders engaged</li><li>• Stakeholder feedback integration into project decisions</li></ul>
2	Frequency	<ul style="list-style-type: none"><li>• Monthly stakeholder engagement reviews</li><li>• Quarterly assessment of stakeholder feedback</li><li>• Bi-annual stakeholder perception surveys</li></ul>
3	Responsible Party	<ul style="list-style-type: none"><li>• Stakeholder Engagement Team Leader</li><li>• Project Manager</li><li>• Monitoring and Evaluation Officer</li></ul>
4	Strategies for Data Collection	<ul style="list-style-type: none"><li>• Surveys and feedback forms distributed after engagement activities</li><li>• Stakeholder engagement logs documenting interactions and feedback</li><li>• Focus group discussions and interviews with key stakeholders</li></ul>
5	Reporting Strategy	<ul style="list-style-type: none"><li>• Quarterly stakeholder engagement reports highlighting key insights and trends</li><li>• Annual stakeholder engagement impact assessments</li><li>• Real-time dashboards displaying stakeholder feedback and engagement metrics</li></ul>

## 7.2 Reporting

All stakeholder engagement activities must be documented and recorded. This includes not only engagements carried out but enquiries and grievances as well.

Also, as part of the monitoring process and depending on the project stages, monthly or quarterly stakeholder engagement reports should be prepared by the responsible persons to track the progress of implementing the stakeholder engagement plan and make changes where necessary.

Means of reporting include meeting minutes (**see Annex 3**) or notes, pictures, video and audio recording and report writing. Good reporting will help update the SEP current scope/content and provide the project with valuable information about its stakeholders.

## 8. Conclusion

Meaningful participation by all affected stakeholders is key to a successful investment. Investors who take the time and invest the resources necessary to do so and thus obtain the FPIC of these stakeholders are more likely to see their investment result in a long-term positive return. This toolkit can help investors achieve this result.

# Annex 1: Sample Key Message Document

## **Title:**

Key Message Document for [Investment Project Name]

## **Introduction:**

We are excited to share information about the [Investment Project Name], a transformative initiative aimed at [briefly describe the project's main objectives and benefits]. This key message document provides an overview of the project and our commitment to meaningful stakeholder engagement.

## **Project Background:**

The [Investment Project Name] aims to [summarize the project's background and key components briefly]. The project is scheduled to commence in [start date] and expected to be completed by [end date].

## **Project Proponents:**

The [Investment Project Name] is being spearheaded by [Investor/Consultancy Name], a reputable organization with a proven track record of successful investments in [industry sector]. Our team is dedicated to ensuring the project's success and creating lasting positive impacts in the community.

## **Intended Activities:**

Throughout the project lifecycle, we plan to [describe the main activities or phases of the project briefly]. These activities are designed to [briefly explain the intended outcomes and benefits for stakeholders].

## **Mode of Stakeholder Engagements:**

We are committed to fostering open and transparent communication with all stakeholders involved in the project. Our engagement approach will include [describe the planned methods of stakeholder engagement, such as community meetings, consultations, and feedback mechanisms].

## **Assurance of Good Practices:**

We pledge to adhere to the highest standards of professionalism, ethical conduct, and respect for community rights. The [Investment Project Name] will prioritize sustainability, social responsibility, and the protection of community interests throughout the project implementation.

## **Investment Project Impacts:**

The investment project will bring about the following positive impact to your immediate community: [xxx e.g employment, access roads, access to xxx mgw of electricity, xxx e.g. access to xxx water plants for portable clean water],[ xxx e.g xx% increase in land/property value]. While we envisage an initial discomfort such as xxxxx, xxx, xxx, we are committed to mutually agreeable mitigation and/adaptation investment/activities in ensuring minimal impact on your livelihood.

## Annex 2: Sample Letter of Intent

[Date]

[Recipient Name]

[Government Stakeholder/Traditional Leader]/ [Government Agency/Community Name]

[Address]

[City, State]

### **Subject: Introduction of [Investment Project Name] and Stakeholder Engagement**

Dear [Recipient Name],

I am writing on behalf of [Company/Organization] to introduce our upcoming investment project, [Investment Project Name], and to express our commitment to meaningful stakeholder engagement with Government stakeholders, traditional leadership and the residents of [Community/Area].

The [Investment Project Name] is a transformative initiative that aims to [briefly describe project objectives and benefits]. As we value the input and collaboration of key stakeholders, we are reaching out to Government agencies and traditional leaders to seek your valuable insights and support in the successful implementation of this project.

Our team is dedicated to fostering positive relationships with Government stakeholders and traditional leadership to ensure that the [Investment Project Name] aligns with community priorities and contributes to sustainable development in the region. We recognize the importance of engaging with local authorities, community leaders and others to address concerns, explore opportunities for collaboration, and achieve mutual goals.

We would like to invite you to participate in upcoming stakeholder engagement activities, including [briefly describe planned engagement activities]. Your input and feedback are vital to the success of the project, and we are committed to transparent communication, mutual respect, and collaboration throughout the project lifecycle.

Please feel free to contact me at [Your Phone Number/ Email Address] to discuss how we can work together to maximize the positive impacts of the [Investment Project Name] on our shared community.

Thank you for considering our request for partnership and collaboration. We look forward to the opportunity to engage with you and build a fruitful relationship for the benefit of all stakeholders involved.

Sincerely,

[Your Name]

[Your Title]

[Your Company/Organization]

## Annex 3: Sample Meeting Minutes

### SAMPLE MEETING MINUTES

<b>Meeting:</b>	<i>E.g. Meeting between project representatives and community leaders</i>
<b>Date:</b>	<i>E.g. 20<sup>th</sup> September 2024</i>
<b>Time and Duration:</b>	<i>E.g. 10.00 am to 11.30 am</i>
<b>Venue:</b>	<i>E.g. Chief's Palace</i>

### Agenda

#### *Example*

- *Introduction of participants*
- *Welcome Address by Community head or representative*
- *Project presentation*
- *Question and answers*

### Meeting Objectives

#### *Example*

- *To formally introduce the project and its representatives to the community*
- *To provide community leaders with a clear understanding of the project components and impacts*
- *To garner the support of the community leaders for the project*
- *To brief community leaders on the project activities and subsequent engagement*

### Key Highlights

This section gives a detailed summary of what transpired and was discussed during the meeting.

### Questions and Responses

This section summarizes the questions asked during the meeting and the responses provided. It is necessary to mention who asked the question and who provided the response.

Stakeholder	Question/ Comment	Response

### Conclusion and Next Steps

Describe how the meeting was concluded and the next steps discussed or agreed upon and the responsible persons.

### Attendance/ Meeting Register

Name	Institution	Designation/ Position	Contact

### \* For Community Meetings

Name	Position/ Occupation	Community	Contact

