

THE REPUBLIC OF SOUTH AFRICA

WILDLIFE CONSERVATION BOND (P174097)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

April 2021

Table of Contents

Table of Contents	4
Abbreviations	5
I Introduction	6
1.1 Project Description	7
1.2 Component 1: Improved Rhino Conservation Management (US\$8 M)	7
1.3 Component 2 – National/Regional Enabling Conditions to coordinate shared security and research opportunities (US\$0.5 M)	10
1.4 Component 3 – Project Management and Monitoring (US\$0.5 M)	10
2 Stakeholder Identification and Analysis.....	11
2.1 Methodology	11
2.2 Affected Parties.....	12
2.3 Other Interested Parties	12
2.4 Vulnerable Individuals or Groups.....	13
3 Stakeholder Engagement Program.....	14
3.1 Purpose and Timing of Stakeholder Engagement	14
3.2 Summary of Prior Stakeholder Engagement.....	14
3.3 Consultation Overview	16
3.4 Special Measures for Vulnerable Groups.....	19
3.5 Information Disclosure	20
3.6 Special Measures and Exemption During COVID-19 Pandemic.....	20
4 Resources and Responsibilities	22
5 Grievance Redress Mechanism.....	23
6 Monitoring and Reporting.....	26
6.1 Reporting Back to Stakeholders	26
Annex 1: Overview of Stakeholder Needs.....	28

Abbreviations

AENP	Addo Elephant National Park
BRREP	Black Rhino Range Expansion Project (WWF)
CPA	Community Property Association
DEF	Department of Environment, Forestry and Fisheries (South Africa)
ECPTA	Eastern Cape Parks and Tourism Agency
EMI	Environmental Management Inspectorate
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GEF	Global Environmental Facility
GFRNR	Great Fish River Nature Reserve
IUCN	International Union for Conservation of Nature
M&E	Monitoring and Evaluation
NGI	Non-Grant Instrument (GEF)
PA	Protected Area
Project	South African Wildlife Conservation Bond
SANParks	South African National Parks
SEP	Stakeholder Engagement Plan
WCB	Wildlife Conservation Bond
WFA	Wilderness Foundation of Africa
WWF	World Wildlife Fund

Disclaimer: The following is a summary of a project which has been approved in concept and is subjected to completion and amendment. It is not an offer or invitation to sell the notes or a solicitation of an offer to buy the notes, nor does it constitute any form of advice. This summary is separate from, and should not be read in combination with, any offer. Potential investors should not subscribe for any notes referred to in this summary except on the basis of information contained in such entirely separate legal documentation and offering materials at the time of offer. This summary is very high level for simplicity and leaves out material information and does not include any legal documentation that would govern the notes.

I INTRODUCTION

This document provides the Stakeholder Engagement Plan (SEP) for the South African Wildlife Conservation Bond (Project) financed through the grant of the Global Environmental Facility (GEF) administered by the World Bank. The SEP has been prepared by the South African National Parks (SANParks) and Eastern Cape Parks and Tourism Agency (ECPTA) as part of complying with national environmental and social standards and to meet requirements of the World Bank's Environmental and Social Framework (ESF). In particular, it reflects procedures currently in place which meets the objectives of the South African Protected Areas Act (Act no. 57 of 2003) *to promote participation of local communities in the management of protected areas*. SANParks and ECPTA therefore have considerable experience in stakeholder engagement as well as existing staff and guidelines to build mutually beneficial relationships with key stakeholders, including through the Parks Fora and the People & Parks Programme.¹

The Project will utilise an innovative financing model for direct finance to benefit the conservation of black rhinos through the world's first Wildlife Conservation Bond. The Project will provide funding for rhino conservation efforts as well as provide opportunities for members in local communities to participate in the South African biodiversity economy.

The Project will support an evidence-based and adaptive management approach that uses data-supported interventions to dynamically respond to changes in performance risks (a surge in poaching incursions). It will invest in site-based conservation management (Component 1), national/regional enabling conditions (Component 2), project management support (Component 3) to effectively and efficiently execute project activities.

The Project will engage a large number of stakeholders, both those who will be direct beneficiaries and indirectly affected, but also a broader community to ensure the long-term support and success of Project investments.² Local communities and individuals who live in the vicinity of the two supported Protected Areas (PAs), Addo Elephant National Park (AENP) and Great Fish River Nature Reserve (GFRNR), will be specifically engaged. In addition, in accordance with the Project's Environmental and Social Management Framework (ESMF), as well as required under South African national law, community members will be consulted to provide insights on the environmental and social process and be informed about expected environmental and social impacts, and planned mitigation measures. The main forum for engagement will be through the existing Parks fora and community engagement structures already in place in the two PAs.

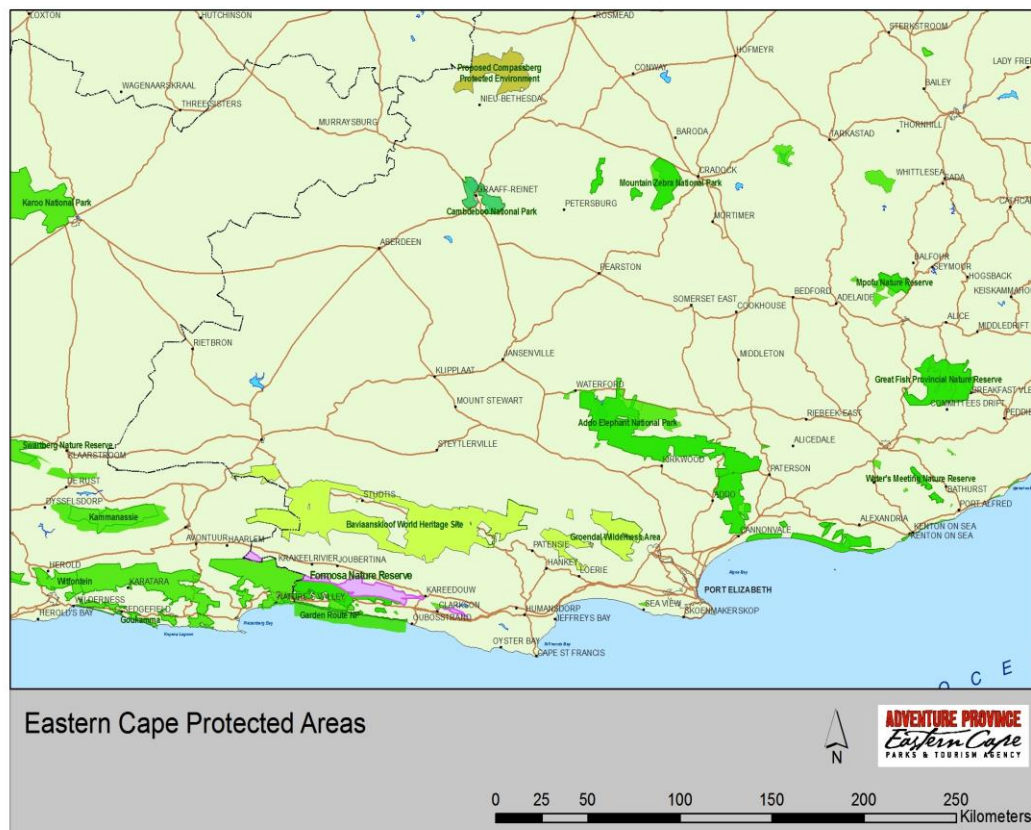
¹ The People & Parks Programme was established through the Department of Environment following the World Parks Congress held in Durban in 2003. The Programme was designed to facilitate active participation of rural communities in governance, access to and benefit sharing from Protected Areas.

² Under the Protected Areas Act, stakeholders are defined as *municipalities, other organs of state, local communities and any other affected parties which have an interest in the area, but are not limited to this group and may also include: individuals, neighbours, visitors to parks, private companies or individuals whose business relates to or could be impacted on by protected areas, community/ies, groups with specific interests and concerns, Park Forums, national and international groups with an interest in conservation or the management of protected areas, Non-Government Organisations; Community-Based Organisations; SANParks and vulnerable and disadvantaged persons.*

1.1 Project Description

The Project's geographical focus is on two priority PAs in the Eastern Cape of South Africa as seen on the map (Figure 1). The Project will support an evidence-based and adaptive management approach that uses data-supported interventions to dynamically respond to changes in performance risks (a surge in poaching incursions). It will invest in site-based conservation management (Component 1), national/regional enabling conditions (Component 2), project management support (Component 3) to effectively and efficiently execute project activities, including the World Bank Environmental and Social Framework (ESF). The World Bank will transfer funds to the project-specific segregated bank sub-accounts at partner sites: SANParks for AENP and ECPTA for GFRNR. These project partners will then use the funds to implement site-specific activities. SANParks and ECPTA will work with communities to optimise social and gender inclusion in Project benefits for a more positive future supported by better conservation.

Figure 1: Map of the Project Area



1.2 Component I: Improved Rhino Conservation Management (US\$8 M)

The Project's geographical focus is on two priority protected areas in the Eastern Cape of South Africa AENP and GFRNR. Proceeds from the Wildlife Conservation Bond (WCB) will be used to fund enhanced conservation activities at two priority black rhino populations. The AENP and the GFRNR host two priority black rhino populations that are of global significance to the conservation of this species. This region experienced a 58 percent increase in rhino poaching in 2018.

The project will support implementation of site-specific five-year black rhino conservation strategies. These site-specific rhino conservation strategies are based on best practice, focusing on habitat and biological management, range availability, containment and counter-poaching, community empowerment and robust monitoring protocols.

Component 1a – Improving rhino conservation and natural resource management in the Addo Elephant National Park (US\$4.5 M)

AENP is managed by SANParks. AENP has a strong track record of black rhino conservation and is a major conservation success story given the large-scale expansion of the Park over the past 30 years, including through funding support from the GEF. Activities under this component will include:

- **Rhino Population Management.** AENP has three sections that currently hold rhino and will expand into a fourth section during Project implementation. This includes translocation of rhinos to the new section from existing rhino sections. This will reduce densities in existing areas and ensure high rhino growth rates in all rhino sections throughout the 5-year investment period.
- **Habitat Management.** Habitat Management plays a low-cost but critical role. Access to water is limited in AENP, both in terms of physical water points and due to competition with elephants. AENP will increase distribution of water in two sections through additional boreholes and secure the supply of water in a third section. As water attracts elephants which compete with rhino, selected water points will have elephant exclusion fences. This mimics a natural water gradient, reducing elephant browse pressures across the reserve by only allowing elephants to drink at certain waterholes.
- **Range Availability.** The new section inside the PA will be fenced to the required specifications to contain rhinos with the infrastructure established for an Anti-Poaching Unit. There is a need for an upgrade to the rhino holding bomas and some rhino capture and transport equipment to facilitate the translocation of rhinos into this new section.
- **Containment and Counter-Poaching.** Given the predicted increase in poaching in the Eastern Cape and the current law enforcement capacity at AENP, substantial security interventions are needed, including recruitment, equipping and training of security staff. An operations control room will be built to collate information and inform intelligence-led law enforcement. Access control will be enhanced, fences upgraded, and communications and aerial support improved. Training and capacity building will be conducted to improve capability to react to poaching incidents, information collection and technology use. In addition, security staff will receive mandatory annual human rights training and will hold an Environmental Management Inspectorate (EMI) certificate, which provides the necessary knowledge and mandate to enforce the law.
- **Community.** The sites will work with target communities to engage them in project activities through the established community forum. The Project sites target a biodiversity economy node identified by the Government of South Africa. Community engagement will include benefits to staff currently employed on a permanent basis and project staff on the following programs: Working for Water, Working on Fire, Working on Ecosystems and Environmental Monitors. SANParks will also employ temporary staff that works on an ad hoc basis and for maintenance functions. Through the Project SANParks will appoint staff to work as rangers, monitors, gate guards, joint operations centre staff and a project manager. Furthermore, there will be employment opportunities during the construction phase of new infrastructure as well as maintaining current

infrastructure. The project offers many positive externalities that can benefit wildlife conservation and the livelihoods of local /neighbouring communities.

Component 1b –Securing rhino populations in the Great Fish River Nature Reserve (US\$ 3.5 M)

The GFRNR is a regional park managed by statute by the ECPTA. Activities under this component will include:

- **Rhino Population Management.** When black rhino populations are confined, they can suffer from slowing growth rates due to resource limitation and density dependence. The Project will continue ongoing activities in the GFRNR to remove rhinos to other areas to maintain a density which supports high growth rates. Rhinos will be moved in collaboration with the WWF-Black Rhino Range Expansion Project (BRREP) to establish new black rhino populations across Southern Africa, an important strategy to spread extinction risk. In order to retain high growth rates at GFRNR, the density will need to be managed by removing 15 percent of the rhino population every third year.
- **Habitat Management.** Activities will support improved water management in the GFRNR including by creating secure water points in parts of the reserve and removing some existing dams (created under the previous livestock farming era) in high-risk poaching areas. The Project will also invest in a maintenance team to support maintenance of roads, fences, infrastructure and vehicles on the reserve.
- **Containment and Counter-Poaching.** Major security interventions are needed at the GFRNR given the predicted increase in poaching in the Eastern Cape and the current law enforcement capacity at the site. Interventions will include restructuring the security staff under a newly appointed security manager; recruitment, equipment and training of new security personnel; upgrading fences; establishment of an operations room and a communications network; and upgrading access control and aerial support. Training and capacity building will be conducted to improve capability to react to poaching incidents, information collection and technology use. Security staff will receive mandatory annual human rights training and will hold an EMI certificate, which provides the necessary knowledge and mandate to enforce the law.
- **Community.** The sites will work with target communities to engage them in project activities through the established community forum. The reserve's neighbouring communities, local municipalities, traditional leadership and private landowners are all represented on the Park Forum which meets regularly. This forum is used effectively to communicate with neighbouring communities and to keep them informed about new developments and projects like the WCB. The Project sites target a biodiversity economy node identified by the Government of South Africa, and direct employment will support growth of these wildlife economy nodes. The community will also benefit from the project as staff will be hired, including rangers, monitors, administrative staff and other roles that will be employed from the communities. In addition, ECPTA has a co-management agreement with the Likhayaletu Communal Property Association and successfully co-manages the reserve with them and benefits from this project will benefit the community as co-owner of the reserve.
- Interventions under range availability are not included in this component as there are no suitable options for range expansion in the GFRNR.

1.3 Component 2 – National/Regional Enabling Conditions to coordinate shared security and research opportunities (US\$0.5 M)

To complement the project-specific interventions (component 1), component 2 focuses on creating national/regional enabling conditions to help catalyse security and research efforts that will benefit both sites. National engagement will strengthen linkages with other relevant projects (including the two GEF-7 activities - South Africa Global Wildlife Program) and engage where feasible in relevant efforts organized by the Global Wildlife Program and the International Consortium on Combating Wildlife Crime. For example, coordination efforts may include activities related to contributions to enforcement coordination, data exchange, sharing of lessons learned and testing of technologies. In addition, given the geographic proximity of the two South African sites, there are several interventions that will serve to benefit both sites through integrating the workplan and budget. These activities have been developed with both SANParks and ECPTA.

Implementation of the national/regional enabling conditions will be implemented by WFA. This component will include the provision of an experienced Senior Law Enforcement Advisor to work with both sites as they implement and institutionalize the significant changes to law enforcement operations at site. This Advisor role will phase out over the course of the 5-years once suitable capacity has been developed at both agencies. The Senior Advisor will provide technical expertise on rhino law enforcement including the deployment of suitable technologies and help facilitate uptake of technologies at both sites to improve detection of poaching incursions. This component facilitates sharing of lessons learnt and building of collaboration between the sites and with other donor-funded efforts. This component will also include support for research activities to improve the body of knowledge and further optimize chances of achieving the rhino growth rates under an adaptive management framework, as well as knowledge management and systematization of the project's lessons learned.

This component will build on the organizational and financial due diligence conducted on each PA during the project preparation phase (Investment Readiness conducted from 2018 to 2020) to assess the enabling environment and to understand whether there were any major associated risks to investment. The enabling conditions categories will be continually assessed during the Project to resolve risks if they arise.

1.4 Component 3 – Project Management and Monitoring (US\$0.5 M)

This component will support project management activities to ensure cost-efficient, timely, and quality delivery of project activities and results, including monitoring and evaluation and project reporting. This would include support for fiduciary management aspects, including procurement and financial management, the World Bank's Environmental and Social Framework (ESF), and monitoring and evaluation. It supports the Monitoring and Evaluation system to report to the GEF, according to its monitoring policies and guidelines on the expected project's results (disaggregating by gender, where appropriate), informing the Conservation Success Payment. Component 3 activities will be carried out by staff assigned by SANParks and the ECPTA to carry out these functions.

The project design includes targeted interventions for generating better jobs at both sites. The number of direct beneficiaries disaggregated by gender as co-benefit is a key indicator that will be monitored and reported on for the project. This will provide detail on permanent and temporary employment at both sites, disaggregated by gender.

2 STAKEHOLDER IDENTIFICATION AND ANALYSIS

This section identifies project stakeholder that will be informed and consulted about Project activities. For SANParks this will build on the existing stakeholder mapping initiative which is being rolled out by SANParks nationally. The project stakeholders will include Project Affected Parties and other Interested Parties – those individuals, communities, groups, and public-sector agencies that will be affected by or have interest in the Project activities. Project stakeholders are defined as individuals, groups or other entities who:

- Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project (also known as ‘affected parties’); and
- May have an interest in the project (‘interested parties’). They include individuals or groups whose interests may be affected by the project and who have the potential to influence the project outcomes in any way.

Cooperation and negotiation with these stakeholders throughout the Project development and implementation also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the project-related information and as a primary communication/liaison link between the project and targeted communities and their established networks. Verification of stakeholder representatives (i.e., the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Depending on the different needs of the identified stakeholders, the legitimacy of the community representatives can be verified by checking with a random sample of community members using techniques that would be appropriate and effective considering the need to also prevent coronavirus transmission

2.1 Methodology

In order to meet best practice approaches, the Project will apply the following principles for stakeholder engagement in an appropriate manner considering social distancing requirements:

- ***Openness and life-cycle approach:*** public consultations for the Project will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- ***Informed participation and feedback:*** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analysing and addressing comments and concerns. This will also be influenced by the communication and risk management strategy and the studies undertaken to understand community attitudes and modes of communication will inform this process.
- ***Inclusiveness and sensitivity:*** stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the project is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current

circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods.

- ***Special attention should be given to vulnerable groups***, in the context of this project, particular the disabled, women, youth and elderly with attention to the ethnic and linguistic background to ensure appropriate measures are incorporated. A summary of the SEP will be translated to IsiXhosa to allow for broad stakeholder engagement through forthcoming People & Parks events as well as other key public engagements to allow for broad engagement in environmental and social management. Should the beneficiaries identify any other appropriate languages within; the project areas, the stakeholder engagement and summary of the document shall be conducted and translated in these languages in addition to isiXhosa.

An overview of Project stakeholder needs is provided in Annex 1.

2.2 Affected Parties

Affected Parties include local/neighbouring communities, community members and other parties that may be experience direct or indirect impacts from the Project.³ These impacts are primarily related to job opportunities provided through the Project investment in both permanent and temporary activities Component 1a and 1b in the two PAs. The Trusts and Associations engaged in the two PAs represent these stakeholders and currently have direct involvement in park management. Specifically, the following individuals and groups fall within this category:

- Local Communities – Addo Elephant National Park:
 1. Enon-Bersheba Community Trust
 2. Mayibuye Ndlovu Development Trust
- Local Communities – Greater Fish Nature Reserve:
 1. Likhayaletu Community Property Association (CPA)

2.3 Other Interested Parties

Other key interested parties and broader stakeholder groups who may interested in the Project include the following:

- Nationally:
 1. Department of Environment, Forestry and Fisheries
 2. Department of Agriculture, Land Reform and Rural Development
 3. Department of Tourism
 4. Department of Small Business Development
 5. Department of Employment and Labour
 6. People & Parks Programme
 7. Eastern Cape Provincial Heritage Resources Authority
- Eastern Cape Provincial and Local Government:
 1. Department of Economic Development, Environmental Affairs and Tourism
 2. Department of Social Development
 3. Department of Rural Development and Agrarian Reform
 4. Department of Health

³ Under the Protected Areas Act local communities are defined *as any community of people living or having rights or interests in a distinct geographical area.*

5. People & Parks Programme
 6. Amathole District Municipality
 7. Ngqushwa Local Municipality
 8. Sarah Baartman District Municipality
 9. Sunday's River Valley Local Municipality
- NGOs:
 1. Eastern Cape Non-Governmental Coalition
 2. Wilderness Foundation Africa
 3. Mvula Trust

2.4 Vulnerable Individuals or Groups

Within the communities outlined in section 2.2, special attention should be paid to groups and individuals or groups with particular vulnerability. The PAs already places significant emphasis on women and youth due to gender inequity and disadvantages for the youth population. In this Project, based experience within engagement, the following groups require special attention:

1. Disabled
2. Women
3. Youth
4. Elderly

The PAs currently have special arrangements for women and youth and will increase inclusion of the disabled and elderly population. The Project will also ensure appropriate measures are in place to ensure that information is available in IsiXhosa or any other predominate language identified by the beneficiaries

3 STAKEHOLDER ENGAGEMENT PROGRAM

3.1 Purpose and Timing of Stakeholder Engagement

During Project implementation, the PAs will engage stakeholders through existing engagement structures as early as possible and will continue the engagement throughout the implementation of the Project, particularly during surveys, baseline data collection, planning, mobilization, implementation stages and until the Project is eventually closed out. At this stage the decisions on public meetings, locations, and timing of meetings have not yet been made. However, existing approach to community engagement includes regular public meetings – the Park Fora and engagements with the PA associated community trusts (with consideration of restrictions for the duration of the COVID-19 pandemic), workshops and focus groups. There are currently focussed engagements with youth, women and small-medium enterprise development, and methods will be adopted to reach other vulnerable groups for specific activity engagement. The PAs actively engage to secure public and private funds to enhance engagements and upscale activities accordingly in parallel to the Project activities.

The stakeholders will be further engaged once the Project is approved as well as prior to and during implementation of the Project activities. However, the nature and frequency of follow up consultations will differ depending on the specific Project components and activities.

Key principles underpinning the stakeholder engagement program will include the following:

- Engage stakeholders through existing structures as early as possible, such as the Parks Forum/People & Parks programmes;
- Take cognisance of the social, economic and environmental needs of key stakeholders concerned;
- Support biodiversity conservation and sound environmental management integrating community based natural resource management and threat mitigation strategies;
- Address issues related to current resource constraints and utilisation impacts;
- Be integrated and supportive to current appropriate and workable initiatives;
- Focus on integrated, people-centred natural resource management and planning;
- Be based on the principles of sustainable utilisation; and
- Support general principles of sustainability, efficiency and effectiveness.

3.2 Summary of Prior Stakeholder Engagement

Stakeholder engagement is critical to the Project's success. The Project intends to help conserve natural habitats and wildlife of global value, while allowing the realisation of the economic potential for social development of these natural assets. High expectations as to what the PAs can deliver may lead to frustration with Project results.

Simultaneously, local stakeholders in many instances demonstrate negative perceptions about PAs. However, there are no existing tension in the region related to the PAs. Issues that are frequently discussed in Parks Fora relate to the economic pressures in the adjacent communities. The PAs constitute major employers in the area and will increase opportunities through the Project investments, with a significant portion of recruitment through the community structures to ensure equitable access to employment. Recent discussions have taken place regarding access to elephant dung and medicinal plants.

Elephant dung will likely be accommodated while access to specific plants require further impact assessment to protect the biodiversity in the PAs. Grazing access has come up through community engagement but, in most cases, cannot be accommodated due to the associated impact related to specific areas.

During the preparation of the Project a number of engagements were organised to consult key stakeholders, including government agencies and key project stakeholders in the two PA locations. The meetings and key discussion points are reflected in the table below.

Table 1: Prior Stakeholder Consultations

Place	Date	Participants	Key Points Raised
Greater Fish Nature Reserve	5 December 2019	ECPTA Brakfontein Communal Property Association	<ul style="list-style-type: none"> ○ General discussions about developments and opportunities for Brakfontein game farm ○ ECPTA indicated that it is attempting to leverage resources for Brakfontein and Double Drift through the GEF7 process ○ The rationale of GEF7 Pillar 2 was explained and it was communicated that there seems to be an opportunity for support via GEF7 ○ It was resolved that ECPTA can continue to investigate opportunity for Brakfontein as it aligns with the vision that the community has for the region.
Greater Fish Nature Reserve	20 January 2020	ECPTA Brakfontein Communal Property Association	<ul style="list-style-type: none"> ○ Provided feedback on GEF7 developments, including copy of the proposal submitted and to verify that the content is in line with the vision of the community ○ Attendees worked through the proposal and the draft presentation. The delegated CPA representatives confirmed that the proposal and the presentation reflect the vision of the community accurately. ○ Logistics for site visit to Brakfontein
Addo Elephant National Park	29 January 2020	DEFF SANParks iSimangaliso Wetland Park Authority SANBI Eastern Cape Parks and Tourism Agency Wilderness Foundation Africa Mayibuye Ndlovu Development Trust	<ul style="list-style-type: none"> ○ Opportunities for community beneficiation from tourism in AENP ○ Need to create benefits from conservation for land claim communities ○ Need for more collaboration and closer working relationship between PA agencies and neighbouring communities ○ Need for technical and financial support in setting up community-owned enterprises ○ Importance of well-structured and capacitated community governance structures

SANParks Summit hosted at Golden Gate	25 -27 November 2019	National Socio Economic Transformation Summit participants	<ul style="list-style-type: none"> ○ Broadening access to resources ○ Development and implementation of social cohesion programmes ○ Support to obtain contracts, development of business plans, marketing, mentorship and partnerships
SANParks Summit hosted in Port Elizabeth	14 March 2020	National Youth Summit participants	<ul style="list-style-type: none"> ○ Business opportunities within the PA ○ Key areas for entrepreneurial development ○ Support for youth ○ Memorandum of understanding signed with National Youth Development Agency
Greater Fish Nature Reserve	30 January 2020	DEFF SANParks iSimangaliso Wetland Park Authority SANBI Eastern Cape Parks and Tourism Agency LikhayaLethu CPA People & Parks Programme (Eastern Cape) Umhlaba Consulting World Bank	<ul style="list-style-type: none"> ○ Limited livelihood options – very poor rural area with limited access routes ○ Effective co-management agreement between community and conservation agency ○ Opportunity to development a diverse and resilient wildlife economy model, which provides for tourism development, hunting, game breeding, wildlife meat processing ○ Active Provincial People & Parks Programme ○ Well-structured Park Forum representing community leaders and traditional leaders in the area ○ Need technical and financial support with the development of feasibility studies, private sector investment, and reserve management skills

3.3 Consultation Overview

Stakeholder needs vary depending on principle occupation and locality and include but are limited to language needs and capacity building training. These needs are shown in Annex 1. However, through further consultations and engagements with the communities, more stakeholders are expected to be identified, and the table will be updated as planning of activities advance to include them.

The level of interest is currently primarily in the environmental agencies at the national and provincial level, as well as among NGOs due to the innovative nature of the Project. However, community engagement is vital for the success and effectiveness of the Project to ensure support for the Project objectives. Stakeholder’s engagement under the Project will be carried out on two fronts: (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including eliciting their concerns, feedback and complaints about the project and any activities related to the project; and (ii) to improve the design and implementation of the project. Table 2 below identifies:

- Type of Stakeholder to be consulted

- Anticipated Issues and Interests
- Stages of Involvement
- Methods of Involvement
- Proposed Communications Methods
- Information Disclosure
- Responsible Authorities/Institutions

Stakeholder engagement will be carried out for: (i) consultations with stakeholders throughout the entire project cycle to inform them about its plan and activities, including capturing their concerns, feedback and complaints, and (ii) awareness-raising activities to sensitize communities on the project. The generic plan reflected in the table below will be used to guide the stakeholder engagement in particular in relation to Component 1 activities supporting existing multi-stakeholder coordination platforms to develop and/or strengthen a shared vision for rhino conservation and community development.

Awareness raising through information sessions will take place before starting formal consultations and negotiations. Awareness sessions will be undertaken and will take the form of community meetings, informational presentations and dissemination of informational materials, among others. The awareness-building process will entail the following:

- An on-going process, with subproject activities developed to support improved livelihoods within the communities where dialogue and learning events among the participating communities will be undertaken. The Project will support the local leaderships when developing training to mentor community leaders. Community leaders will also play a key role in supporting the implementation of activities; and
- Consultations will entail meetings and focus groups discussions to address potential adverse impacts of biodiversity stewardship and to observe the traditional practices that could be supported by the Project. Community meetings and focus groups will be organised in a manner to ensure that vulnerable groups can participate, including equal access and voice for women. The result of the information collected will be considered in the design of activities and in the planning, materials prepared for the project.

The Project participatory process will involve consultation with community representatives, including vulnerable groups, in areas where people and communities might be affected by project activities. Concerns of communities and suggestions to address them will be discussed at public meetings with anyone affected, so that informed decisions can be made about the options available to them and mitigation measures proposed by the Project. Mitigating strategies will be based on the promotion of improved livelihood initiatives, capacity building of self-help organizations and community based defined productive activities.

Table 2: Stakeholder Consultations Related to the Project

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Preparation	<ul style="list-style-type: none"> • Need for the project • Proposed and activities • E&S principles, Environment and social risk and impact management 	<ul style="list-style-type: none"> • Phone, email, letters • One-on-one meetings • Focus group discussions 	<ul style="list-style-type: none"> • Projected affected individuals and groups • Other interested parties 	Environmental Officer People & Park staff PAs

	<ul style="list-style-type: none"> • GRM 	<ul style="list-style-type: none"> • Outreach activities • Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.) 	<ul style="list-style-type: none"> • Local CSOs, NGOs and social intermediaries • Vulnerable groups • Government officials from relevant line agencies at local level • Local businesses 	
	<ul style="list-style-type: none"> • Need of the project planned activities • Environment and social risk and impact management • GRM • Benefit sharing 	<ul style="list-style-type: none"> • Outreach activities that are culturally appropriate • Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.) 	<ul style="list-style-type: none"> • Affected individuals and their families • Local communities • Vulnerable groups 	Environmental Officer People & Park staff PAs
Implement- ation	<ul style="list-style-type: none"> • Project scope and on-going activities • ESMF and other instruments • SEP • GRM • Benefit sharing • Environmental concerns 	<ul style="list-style-type: none"> • Training and workshops • Disclosure of information through brochures, flyers, website, etc. • Information desks at PAs 	<ul style="list-style-type: none"> • Affected individuals and their families • Local communities • Vulnerable groups • Government officials from relevant line agencies at local level 	Environmental Officer People & Park staff PAs

Various methods will be used for consultations depending on the nature of the activities and stakeholder group to be consulted. This will build on existing procedures and the legislative requirements in South Africa. For example, SANParks has a current stakeholder relationships programme which is detailed in the Park Management Plan for AENP (2015-2025). The objectives of the stakeholder participation process are to:

- Create a conduit for the accurate and timely dissemination of information to interested and affected stakeholders;
- Create the opportunity for communication between SANParks and the public;
- Promote opportunities for the building of understanding between different parties;
- Provide the opportunity for stakeholders to give meaningful input into the decision-making processes that drive the development of the park management plan.

Stakeholders could include all three levels of government, international and national agencies (including conservation and development NGOs and research institutes), business partners, local communities, employees, tourists and the media. Stakeholder engagement and co-operative partnerships are facilitated through a range of informal

and formal structures on a National, Provincial and local level, including CPAs, local and regional tourism operators/ partners, several community, women and youth for a range of conservation authorities and entities, agricultural, commercial and retail sectors in the local and regional landscape, conservation, education and health NGOs, local and international training and research institutions, media houses, etc.

As far as possible the stakeholder consultation strategy will be focused on using existing Fora, People & Parks Programme structures / fora as well as current structures linked to the further implementation of the land reform programme and related initiatives.

Other mechanisms that will be used to support and supplement effective and continuous stakeholder consultation include the following:

- Encourage and support attendance and effective governance of meetings for existing forums;
- Establish, support and review issue-based fora;
- Establish new fora where appropriate; and
- Conduct annual and bi-annual road shows with targeted stakeholder groups.

Comments will be captured at meetings of existing governance structures such as Park Forums, People & Parks Programme structures/fora/committees as well as current structures linked to the further implementation of the land reform programme and other related initiatives. Often meetings are held bi-monthly and the key issues discussed in these meetings are often communicated to the broader community through intensive engagements, village and ward meetings, and outreach programmes. Feedback on the outcomes of these discussions will then be provided at the next forum and/or committee meetings.

3.4 Special Measures for Vulnerable Groups

Vulnerable groups are a segment of the population that has some specific characteristics. Their conditions place them at higher risk could easily tumble into poverty than others living in areas targeted by a project. Vulnerable groups include the elderly, the mentally and physically disabled, at-risk children and youth, HIV/AIDS-affected individuals and households, religious and ethnic minorities, and women.

Key mechanisms to ensure the inclusion of vulnerable groups include:

- Inclusion of the People & Parks Programme structures in Eastern Cape and at PA level. The People & Parks Programme has broader community structures inclusive of women, including the People & Parks Youth Structure. These structures meet quarterly to discuss developmental projects and any other issues relating to protected areas management. Women are within these structures promoted to take leadership role and effective participation.
- Working with existing Park and Community Forums, which are inclusive structures representing key PA stakeholders (including Community Property Associations/Trusts) on PA level;
- Promotion of the formation of community-level peer networks to amplify the voice of people with disabilities through specialized NGOs;
- Targeting capacity-building resources to ethnic communities;
- Working directly with clusters of tribal households, instead of the traditional governance structures;
- Targeting campaigns road shows with targeted stakeholder groups; and
- Promoting the representation of people with disabilities, women and youth in governance mechanisms.

The Project envisages empowering women and vulnerable groups such as the disabled by (a) ensuring their active participation in project consultation and decision mechanisms at the community level; (b) increasing their integration into and access to proposed community benefits; and (c) providing access to training opportunities and benefits to increase their capacity on leadership. The Project will also define measures to ensure that women and other vulnerable groups, especially youth, are adequately represented and participate in both project activities and decision-making processes.

3.5 Information Disclosure

The World Bank Environmental and Social Standard 10 require that this SEP, the Project ESMF and any subsequent impact assessments or plans are made available to Project affected groups, local NGOs, and the public at large. Public disclosure of Environmental and Social Impact Assessment (ESIA) documents is also a requirement in South Africa legislation and related environmental and social procedures. Thus, any environmental and social plans or updates to plans will be shared in draft at meetings of existing governance structures such as Park Forums, People & Parks Programme structures/forums/committees as well as current structures linked to the further implementation of the land reform programme and other related initiatives to obtain feedback and comments. Where PA response to feedback and comments cannot be provided in the respective meetings, will be delivered, including final planning measures, at the following forum and/or committee meetings.

The PAs will make available copies of the ESMF, SEP and any required site specific Environmental and Social Management Plans (ESMPs) or ESIA's on the respective websites and offices. The ESMF and SEP are available online and hard copies will be provided to the local municipalities adjacent to the PAs. All necessary safeguard documents that will be locally disclosed will also be forwarded to the World Bank for disclosure on the official World Bank Website.

Information related to environmental and social due diligence during Project implementation will be made available through short reports and meetings with translations in the local languages. Information will be provided through existing Park Forums, People & Parks Programme structures/forums as well as current structures linked to the further implementation of the land reform programme and related initiatives, and these mechanisms will be used to ensure feedback, suggestions and complaints are well captured and articulated.

3.6 Special Measures and Exemption During COVID-19 Pandemic

In the current scenario, public consultation and disclosure would need to be consistent with the requirements for stakeholder engagement and taking into account COVID-19 related quarantine and lockdown measures. The World Bank's guidance Technical Note on Public Consultations and Stakeholder Engagement in WB-supported operations will be followed when there are constraints on conducting public meetings. During the pandemic many of the stakeholder engagement activities planned for, as a critical part of the Project design, cannot proceed as anticipated wherefore there PAs will needs to adjust the approach.

Where there are constraints for conducting public meetings for reasons beyond the project control, the following procedures should be followed:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.

- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the engagements, and how restrictions that are in effect in the country/project area would affect these engagements.
- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines.
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

The Project will, during the pandemic:

- Avoid large public gatherings, including public hearings, workshops and community meetings.
- If smaller meetings can safely be carried out and are permitted by authorities, the Project can conduct consultations in small-group sessions, such as focus group meetings.
- Where stakeholder cannot safely meet, consider how to enable critical meetings through online meeting platforms (Google Meet, Microsoft Teams, WhatsApp, Zoom, Skype, etc.).
- Enable diversification of the PAs means of communication and rely more on social media and online communication tools.
- Develop and distribute messages through posters and leaflets.
- For broader messages, use traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail).
- Ensure that regardless of measures used to continue stakeholder engagement to advance Project activities that stakeholders and communities know how to provide feedback and suggestions to the PAs.

Reschedule and delay any critical meetings that cannot reasonably be conducted in the COVID-19 pandemic.

4 RESOURCES AND RESPONSIBILITIES

Both human and financial resources are required for the successful implementation of the stakeholder engagement activities for the Project activities and as well as the Project. The existing People & Park programme staff at the respective PAs will be in charge of implementing the SEP and report to the PA Manager. In AENP the engagement is overseen by the Regional Manager for Social Economic Transformation Officer with day to day implementation of the Social Economic Transformation Officer assigned to AENP. In GFRNR community engagement is overseen by the Community Liaison Officer. These officers will maintain all documentation related to implementation of the SEP. This includes invitations to meetings and distribution lists, minutes and registration of attendants (and increasingly, as feasible, recordings of meetings), circulation of meeting documentations to attendants for affirmation, monthly and quarterly reports on progress and plans, and the grievance procedure.

Where relevant, the People & Parks staff will liaise closely with assigned Environmental Planner/Officer and Project Manager. Detailed stakeholder planning should be undertaken as Project activity design emerges and be adequately budgeted in accordance with the principles included in this document. Where additional resources are required due to scope of stakeholder engagement, additional funds will be allocated from project funds under Component 3.

5 GRIEVANCE REDRESS MECHANISM

Grievance Redress Mechanisms (GRM) and feedback provide a formal avenue for affected groups or stakeholders to engage with the Project on issues of concern or unaddressed impacts. The mechanism will capture any complaints, feedback or suggestions about the way a Project is being implemented or related impact. They may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents or impacts or questions about benefits arising from the project. Identifying and responding to grievances supports the development of positive relationships between projects and affected groups/communities, and other stakeholders. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. The management of grievances is therefore a vital component of stakeholder management and an important aspect of risk management for a project. Projects may have a range of potential adverse impacts to people and the environment in general, identifying grievances and ensuring timely resolution is therefore very necessary.

The PAs are currently primarily receiving comments and feedback through the regular Park Fora. There is therefore already an understanding among interested and affected parties to ability to submit grievances and feedback.

Grievances and general feedback can be submitted by email, written letter, SMS and a suggestion/complaint box placed at main PA offices. All pertinent contact points and procedures will be shared during upcoming Park Fora and other communication between communities and PAs to ensure knowledge of access as well as procedures for case handing. As part of wider information sharing on the procedures, PA officials will maintain the confidentiality of any aggrieved party and access to records will be limited to a small number of staff to ensure anonymity in all cases. Registration of issues will be handled by each PA's People & Parks staff and referred within existing structures as necessary to provide a timely respond and resolve issues. The PA will provide a written response of the resolution to complainants/person who raised an issue. The Project Committee for each PA, which may be constituted within existing structures, will, on a monthly basis, review any comments and feedback registered and status of resolution. Status of the grievance mechanism will be a standing item on the Project Committee agenda. Should an appeal be filed by a complainant the Project Committee will review and determine a response. Where an issue cannot be resolved, any aggrieved person may further appeal a case here. The People & Parks staff will maintain logs and refer issues for assessment or investigation to maintain timely verification and resolution to issues. This includes issues that are raised Park Fora for the PAs. The People & Parks staff will compile status and progress reports for World Bank regular reporting based on the monthly status reports from the Project Committee.

Specific GRM and feedback contact points are the following:

Addo Elephant National Park (main camp) through the existing People & Park Forum established to oversee the implementation of the Park Management Plan, People & Parks Programme structures, Mayibuye Ndlovu Development Trust; and/ or Park Reception: 042 233 8600.

Great Fish River Nature Reserve through the existing Double Drift Co-management Committee established to oversee the implementation of the Double Drift Co-Management Agreement and People & Parks Programme structures.

The grievance mechanism is outlined in the table below.

Step	Issue	Setting	Responsibility	Target timeframe
1	Uptake of feedback, comments and grievance	Parks Fora Email Letter In person Phone SMS	People & Parks staff	Throughout Project
2	Registration and screen	PA offices (excel tracking)	People & Parks staff Other technical staff support initial screening, as needed	Within 48 hours of receipt
3	Acknowledgement,	Appropriate fora, direct to individual	People & Parks staff	Within 48 hours of registration
4	Assessment and solution	PA offices, visits to relevant sites where needed	People & Parks staff and technical staff, management where needed	Within 14 days of registration
5	Resolution	Direct to individual and/or appropriate fora,	People & Parks staff	Within 21 days of registration
6	Reporting, M&E	Project Committee World Bank	People & Parks staff	Monthly Bi-annually
7	Appeals	Project Committee	Project Committee	Monthly

Should any grievance relate to gender-based violence or harassment, such a case will be handled through the existing human resource (HR) procedures in SANParks and ECPTA respectively related to discipline and grievance. The existing HR procedures for such cases are clear in regard to expected conduct, case handling and consequences and handled in accordance with national law. For any staff member any has a case of this nature the existing policies on grievance will be followed. Where it is a person not employed by either PA a case should be submitted through the Project GRM but subsequently referred to HR management. In accordance with the disciplinary policies and procedures, previous harassment cases have been adequately handled swiftly in the past and led to suspension of officials/staff.

The Project will ensure in consultations with stakeholders that grievance mechanisms are appropriate and acceptable. The GRM is an essential part of the safeguard instrument to resolve complaints on the project activities. It should address concerns and complaints promptly, using an understandable and transparent process that is

gender responsive, culturally appropriate, and readily accessible to all segments of the complainant persons. Generally, the GRM will ensure that (i) the public within project areas is aware of rights to access and shall have access to the mechanism free of administrative and legal charges, and (ii) concerns arising from project activity in all phases are addressed effectively. Such kinds of approach are useful, among others, to improve project outcomes, help to prioritize supervisions, identify systematic implementation issues and trends, and promote accountability through creating more predictable, timely and results-oriented responses to citizen concerns.

In addition to the grievance mechanism itself, the Project will develop a communication plan to inform the stakeholders about the existence of the GRM and instructions of operation. The communication plan includes aspects of stakeholder-targeted communication channels, facilitators, multipliers and timelines. An outline of stakeholder characteristics is provided in Annex 1 and will be updated following Project effectiveness.

In addition, communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit **www.inspectionpanel.org**. It is however recommended that a project level grievance mechanism that has been agreed upon by all stakeholders is put in place early, to avoid small matters snowballing into conflicts that may lead to delayed disbursement and implementation.

6 MONITORING AND REPORTING

Component 3 of the project will support project management activities to ensure cost-efficient, timely, and quality delivery of project activities and results, including coordination between the nodes, M&E and project reporting. This will include workshops, and operational costs to support the project's day-to-day implementation and management, including procurement, financial management, environmental and social safeguards, preparation of annual work plans and organization of audit reports, including the implementation and monitoring of the SEP.

The PAs will monitor the SEP in accordance with the requirements of the Environmental and Social Commitment Plan (ESCP) including changes resulting from updates in the design of the Project or Project circumstances. The extent and mode of stakeholder monitoring with respect to environmental and social performance would be proportionate to the potential environmental and social risks and impacts of the project and their effect on the various stakeholder interests in specific activities.

The Project will monitor the environmental and social performance of the Project, which will include:

- Collection of feedback from stakeholders on environment and social performance of the project, and on the implementation of the mitigation measures outlined in the ESMPs on a bi-annual basis. This will include whether stakeholder engagement is carried out in a consultative manner, in accordance with the SEP and build upon the channels of communication and engagement as established with stakeholders.
- Periodic reviews of compliance with requirements of the legal agreement, including the ESCP.
- Where appropriate, engaging stakeholders and third parties such as independent experts, local communities or NGOs, to complement or verify projects stakeholder monitoring information.

6.1 Reporting Back to Stakeholders

The stakeholder engagement process will aim to support the development of strong, constructive and responsive relationships among the key Project stakeholders for successful management of the Project's environmental and social risks and preparing stakeholders for the Project. Effective engagement between the PAs and the various Project stakeholders improves the environment and social sustainability of projects, enhances project acceptance and makes significant contribution to successful project design and implementation.

The SEP builds on the existing procedures under the People & Parks program, Community Forums, and Park Forums and specific stakeholder and/or communication plans for consultation and engagement will be developed during implementation.

Annex I: Overview of Stakeholder Needs

Stakeholder Group	Key characteristics	Language needs	Preferred notification means	Specific needs
SANParks/ ECPTA	Literate adults	English	Phone/ written information via e-mail	Daytime meetings
National Government Departments	Literate adults	English	Phone/ written information via e-mail	Daytime meetings
Other Eastern Cape Provincial Government Departments	Literate adults	English	Phone/ written information via e-mail	Daytime meetings
Sarah Baartman/ Amathole District Municipalities	Literate adults	English	Phone/ written information via e-mail	Daytime meetings
Community/ People & Park Forums	Mix of semi-illiterate and literate, with a community of people with various interest	English/ Xhosa / Afrikaans	Community meetings with translator, & radio	Graphic and workshops on process Daytime meetings
NGOs/ Development Organisations	Literate adults	English/ Xhosa/ Afrikaans	Phone/ written information via e-mail	Daytime meetings
Private Sector/ Business Owners/ SMMEs	Literate adults	English/ Xhosa/ Afrikaans	Phone/ written information via e-mail	Daytime meetings