

7 STAKEHOLDER ENGAGEMENT

7.1 Introduction

The term “stakeholder engagement” describes a broad, inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of a project (International Finance Corporation (IFC) 2007).

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have either interest in a project or the ability to influence its outcome, either positively or negatively.

Stakeholder engagement has been an integral part of the project to date. Stakeholder engagement activities have been undertaken by the project team, including community liaison officers (CLO), and consultants including the:

- resettlement teams
- human rights impact assessment teams
- geophysical and geotechnical survey CLO teams
- environmental and social impact assessment (ESIA) teams as part of their specific activities and aimed to provide stakeholders with information and to receive their inputs.

This section focuses on stakeholder engagement during the ESIA process and explains how it fits in with the project team engagement. Stakeholder engagement is an integral component of the ESIA process and the foundation for developing and maintaining the project's social licence to construct and operate.

Stakeholder engagement during the ESIA preparation has been undertaken in accordance with the requirements of Ugandan legislation, international requirements as set out in the Equator Principles III and the IFC (2012) and project policies for stakeholder engagement.

Appendix C3 includes a stakeholder concerns table addressing:

- concerns and questions raised by stakeholders
- responses given to stakeholders in answer to their concerns and questions
- stakeholders who raised the concerns
- reference to where the concern is addressed in the ESIA

7.2 Stakeholder Engagement Principles and Protocols

The following principles are the basis for the ESIA stakeholder engagement:

- Open and Transparent: Information relevant to project activities will be as accessible and transparent as possible, providing stakeholders with a comprehensive understanding of project activities and how they are or may be affected by them (unless legitimate reasons for commercial confidentiality or the protection of stakeholders require that it be kept confidential).

- Based on Listening and Dialogue: Stakeholders will be listened to, their concerns taken seriously, and responses provided in a timely way to address their concerns.
- Participative: Stakeholders will be invited and encouraged to actively engage with the project. The project will be inclusive in this process, considering factors such as gender and cultural considerations and ensuring stakeholders feel they have an opportunity to share their perspectives.
- Proactive: The engagement process will provide information in advance of consultation activities and decision-making points. Potential risks and impacts will be communicated proactively with stakeholders.
- Impact-focused: During the impact assessment process, engagement with communities potentially affected by the project will be, whenever possible, focused around the potential and actual negative project impacts that may concern them in order to jointly identify appropriate avoidance, mitigation and compensation measures. Other stakeholders indirectly affected by the project's impacts may also be consulted.
- Safe: Steps will be taken by the project towards ensuring stakeholder engagement is free from manipulation, interference, coercion or intimidation. Any stakeholder that participates in any form of engagement can do so in a safe and protected way without risk or fear for retaliation (for example, through the use of trusted third parties, individual meetings or group meetings).
- Effective: Information and forms of engagement will be acceptable to, and effective for, the individuals for whose use they were intended and will be accessible, legitimate, transparent and human rights compatible.
- Appropriate: Different forms of engagement may be required for different kinds of stakeholders and for different purposes. Information provided to stakeholders will be provided in formats appropriate to the stakeholder in question, considering the potential need to help with the interpretation of technically complex information.
- Empowering and responsive: Engagement should empower stakeholders to make their voices heard. This will include informing stakeholders of what they can expect in terms of feedback and responses to their inputs.
- Equal and human rights respectful: Everyone, without discrimination, will be afforded the right to participate on equal terms. The project will ensure a gender sensitive approach to engagement and identify the need for any special measures to ensure that vulnerable individuals and groups are inclusively engaged.

In addition to the above principles, project guidelines and protocols have been used to support respectful interactions during the stakeholder meetings, ensure consistency across stakeholder engagement teams in managing sensitivities, expectations and concerns, and avoid mixed messages. These include:

- protocol for photographing stakeholders and permission for use
- cultural dos and don'ts in meetings
- procedure for recording cost reimbursements to stakeholders.

7.3 Environmental and Social Impact Assessment Stakeholder Engagement Objectives

The objectives of stakeholder engagement during the ESIA process were to:

- obtain an understanding of the number and types of stakeholders in the socioeconomic study area
- inform stakeholders about the project and the ESIA
- inform stakeholders about the engagement process and grievance management
- inform stakeholders about the ESIA baseline studies in the areas traversed by the project and associated infrastructure
- obtain stakeholder input into the scope of the ESIA, including the development of valued environmental (and social) components (VEC), impact identification, mitigation measures and potential sources of cumulative impact and impact mitigation
- listen to questions and concerns from stakeholders and ensure these are addressed in the ESIA
- conduct pre-submission meetings to consult a sample of potentially impacted local stakeholders before the submission to the National Environment Management Authority (NEMA) to acquire their feedback on ESIA findings (impacts and mitigation measures), cumulative impact assessment and mitigation measures
- provide a mechanism for ongoing stakeholder engagement and ways in which the stakeholders can continue to participate in the stakeholder engagement process
- ensure regulatory requirements and project standards are met.

7.4 Environmental and Social Impact Assessment Stakeholder Engagement Planning

A stakeholder engagement plan (SEP) to support effective engagement throughout the ESIA process was developed. The ESIA SEP provides direction for the ESIA engagement approach, stakeholder identification, specific engagement plans for the different ESIA phases and the key deliverables from engagement activities.

The SEP focuses on:

- the ESIA stakeholder engagement activities in each phase (see Section 7.5)
- a stakeholder identification and analysis process (see Section 7.5.1.1)
- methods, materials and protocols for stakeholder engagement including information disclosure, consultation, and reporting to stakeholders (see Section 7.5.1.3)
- a data management system for all stakeholder data and minutes of meetings for analysis and follow up
- a project grievance mechanism, which also serves as the ESIA grievance mechanism (see Section 7.7).

7.5 Environmental and Social Impact Assessment Stakeholder Engagement Activities

7.5.1 Stakeholder Engagement During the Scoping Phase

7.5.1.1 Stakeholder Identification

A key element of the ESIA scoping phase was to identify stakeholders and determine their potential interest in, influence over or link to the project area of influence (AOI) through a systematic analysis. The identification process is crucial to ensure that a representative range of stakeholders, particularly those most vulnerable and directly affected, are incorporated within the ESIA engagement strategy.

When identifying and prioritising stakeholders, the following aspects were considered:

- who could be adversely affected by environmental and social impacts in the AOI?
- who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- which stakeholders can best assist with the early scoping of concerns and impacts?
- who strongly supports or opposes the changes that the project will bring and why?
- who is it critical to engage with first, and why? (IFC 2007)

Stakeholders were then identified through:

- inputs from project personnel and the ESIA team's local expert knowledge and experience
- previous ESIAs and other studies conducted in the area
- geographic information system analysis of the AOI to identify the location of communities
- site visits undertaken by the ESIA stakeholder engagement team comprising project personnel and the local expert consultants employed by the project
- stakeholder meetings.

Particular attention was paid to the identification of vulnerable people and groups which could be directly affected by the project. The IFC defines disadvantaged or vulnerable groups as follows:

“Individuals or groups within the project area of influence who could experience adverse impacts from the proposed project more severely than others based on their vulnerable or disadvantaged status. This status may stem from an individual's or group's race, colour, sex, language, religion, political, or other opinion, national or social origin, property, birth or other status. In addition, other factors should be considered such as gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources”.

Identification of vulnerable groups was undertaken during discussions at district and ward level and with potentially affected communities (PAC).

The stakeholder categories and subcategories identified are presented in Table 7.5-1. The specific organisations consulted are listed in Appendix C1.

Table 7.5-1 Stakeholder Categories and Subcategories

Authorities	Directly Affected Groups Including Vulnerable People	Civil Society	Others
National government Local government (district/county and subcounty) Regulatory institutions Policy makers District technical experts Village elected officials Health and educational institutions Police	Landowners Local residents Farmers (nonland owning) Shopkeepers Traders Business owners Pastoralists (cattle herders) Fisherfolk Women (including women in the workplace) Minorities Youth (including unmarried) Elderly Sex workers Children (including orphans) Widows and female headed households People with mental and physical disabilities Chronically ill (i.e., those with HIV and AIDS) Refugees and migrants	Community groups and community-based organisations Media Nongovernmental organisations (NGOs) Religious leaders Traditional leaders and organisations Traditional leaders	Business sector Professional organisations Research institutions Academia Tourism service providers Emergency services

A workshop was held in March 2017 between the project and the ESIA consultants to analyse stakeholders in terms of their interest in the project, potential influence over the project or the potential impact of the project on them.

7.5.1.2 Scoping Stakeholder Engagement Objectives

The objective of scoping stakeholder engagement was to capture the main stakeholder considerations for the development of the terms of reference (ToR) for the EIS.

The specific objectives of the scoping phase engagement were to:

- identify stakeholders
- provide stakeholders with an overview of the proposed project activities, the potential impacts and opportunities and an understanding of the ESIA process

- document stakeholder views, concerns and expectations to inform the development of the scope of the EIS, including the development of the VECs
- acquire stakeholder input during the development of the ToR for the EIS.

7.5.1.3 Scoping Engagement Approach

To deliver the scoping phase objectives, meetings with key stakeholders were held:

- at national level
- in all districts crossed by the project
- in all subcounties with proposed AGIs or temporary construction facilities.

In addition, 13 PACs were consulted (see Figure 7.5-1). The PACs were selected taking into consideration:

- land uses (crop growing, grazing, natural resource use)
- locations of social and environmental sensitivity, including important biodiversity areas
- locations of VECs
- locations of the proposed AGIs and construction facilities.

Meetings

The scoping stakeholder meetings were held between 19 May and 2 June 2017. A total of 1182 people participated in 67 meetings. Meetings were held with:

- 12 national government agencies in Kampala
- a Buganda Kingdom representative
- district health authorities in eight districts
- district authorities in eight districts
- subcounty authorities in 22 subcounties
- two town councils
- 13 villages
- one umbrella organisation of NGOs (Civil Society for Oil). Thirteen NGOs were represented at the meeting.

Appendix C1 contains the list of all stakeholders consulted during the scoping phase.

Stakeholders who were consulted with specific reference to potential sources of cumulative impacts are included in Appendix C1 in a separate section. This included engagements with:

- 10 national government agencies
- government authorities in eight districts
- six town councils
- government authorities in 14 subcounties.

Figure 7.5-1 shows the districts, subcounties and villages engaged with during the scoping phase.

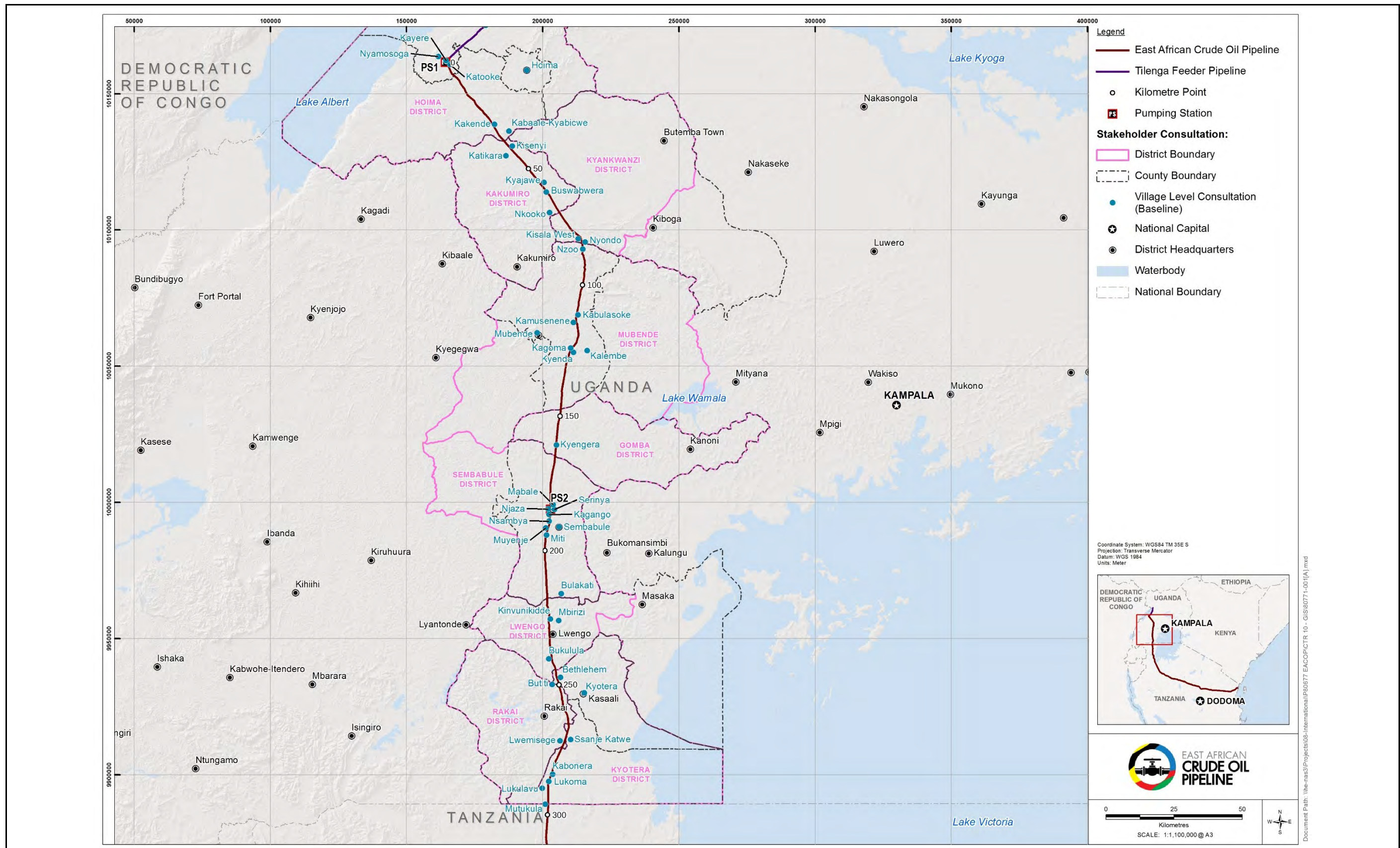


Figure 7.5-1 Districts, Subcounties and Villages Consulted During the Scoping Phase

NOTE: The scoping phase was undertaken before the formation of Kyotera district in June 2018.

Arranging the Engagement Activities

For meetings with district, subcounty and national government stakeholders, invitation letters were hand delivered to the stakeholders one week before the proposed meetings. The invitations were accompanied by project information and ESIA information brochures.

A confirmation phone call was made to the contact person for each stakeholder meeting to confirm the event, the time and place a few days before the meeting.

For village meetings, the following procedure was followed:

- Radio announcements on local stations in English and local languages (Rugungu, Runyoro-Rutooro, Luganda, Runyanko, or Rukiga, Alur) were made at least ten days before the start of the stakeholder engagements in all project affected areas. These announcements aimed to inform the public about the project and to mobilise the relevant communities to attend the planned meetings. Further to this, the following steps were taken.
- Selected villages and their subcounty and district government officials were visited two weeks before the planned meetings to announce the forthcoming community meetings and to obtain commitment from the village and government officials to mobilise the local people to attend.
- A phone call was made to the local council chairmen a week before the proposed village meetings confirming dates and venues.
- Local council chairpersons were contacted a day before each meeting to confirm their assistance with the mobilisation for the meeting.

Engagement Protocol

The protocol adopted for the meetings is outlined below.

- Meetings were held by the ESIA stakeholder engagement team and representatives of the project.
- Meetings were held in relevant local languages or English if appropriate.
- Two background information documents (BID), one outlining the project and one outlining the ESIA, in English and in relevant local languages (Lungu, Alur, Luganda, Runyakore- Rukiga, Runyoro- Rutooro), were distributed to the participants (see Appendix C2 for English version).
- For community meetings, the importance of women's participation was emphasised at the start of the meeting (although separate women's meetings were also held).
- The community meetings started with a prayer and opening remarks by the stakeholder appointed chairperson (each meeting appointed its own chairperson) and introductions. Meetings at subcounty, district and national levels started with introductions.
- All stakeholder meetings included a presentation on the project and the ESIA using a presentation at national level and posters (Appendix C2) at district, subcounty and village level. The project representatives introduced the project grievance procedure.
- After the presentation, a question and answer session was held for stakeholders to question and discuss the project, the project impacts and mitigations.

- During all meetings, the type and status of vulnerable peoples and groups potentially affected by the project was discussed. This served as preparation for further meetings with vulnerable groups during the baseline and impact assessment phase.
- Attendance registers were completed, and all questions and responses were recorded and entered in a database. Appendix C4 presents full records of all formal stakeholder meetings.

The results of the scoping phase consultations aided with the development of the list of priority VECs described in Section 6.

Figure 7.5-2 and Figure 7.5-3 show scoping phase stakeholder meetings.



Figure 7.5-2 Stakeholder Meeting at Kamuli Village



Figure 7.5-3 Stakeholder Meeting with Rakai District Local Government

7.5.2 Stakeholder Engagement During the Baseline and Impact Assessment Phase

7.5.2.1 Baseline and Impact Assessment Stakeholder Engagement Objectives

The objectives of the baseline and impact assessment phase engagement were to:

- introduce the project and ESIA process to stakeholders identified during the scoping phase engagements and who had not been met
- identify and gain access to baseline data (collect, verify and close data gaps) from stakeholders
- gather stakeholder feedback on the identification of impacts and development of management and mitigation measures for potential impacts, particularly where stakeholders have a potential role in developing and implementing these measures.

7.5.2.2 Baseline and Impact Assessment Engagement Approach

Building on stakeholder engagement conducted during the scoping phase, stakeholder identification continued during the baseline and impact assessment phase. ESIA subject matter experts (social, biodiversity, hydrology and cultural heritage) engaged with national, regional and local level stakeholders in their baseline studies. The subject matter experts gathered subject specific data, provided stakeholders with information about the project and the ESIA and potential impacts and recorded their concerns, suggestions and aspirations.

The engagement approach adopted by the teams included the following:

- *International and national level:*

Key informant interviews (KII) were the predominant engagement tool with national government agencies and officials, businesses, NGOs and academic institutions.

- *District and subcounty level:*

KIIs and small group interviews (SGI) were used at this level targeting civil society organisations (CSO), district and subcounty government agencies and service providers (e.g., health) and individual experts (e.g. land, livestock, fisheries).

- *PAC level:*

A sample of PACs with a diversity of socio-economic characteristics were included. The identification of sample PACs was based on the social baseline sampling methodology (see Appendix A11).

PACs were engaged through community meetings, focus group discussions (FGD), SGIs (to understand different livelihood strategies), KIIs (including business representatives, leaders, natural resource users, religious leaders, teachers and traditional healers) and household interviews (HHI). Focus group guides, which were the mechanism used for recording stakeholder responses in that forum, included questions on aspirations and concerns with regards to the project

All engagement activities included an element of identifying vulnerable groups and exploring knowledge, perceptions and attitudes towards vulnerable groups.

Women-only group sessions and interviews were also included to explore gender matters with particular reference to women's perceptions and concerns.

The different methodologies were strategically employed and aimed to identify impacts on vulnerable stakeholders (e.g., SGI with pastoralists, fishermen, artisanal miners and HHI with the very poor, widows, elderly and people with disabilities).

Meetings

The baseline and impact assessment phase engagement meetings were held between 26 October and 18 December 2017. A total of 1401 people participated in 606 meetings. The following meetings were held:

At international and national level:

- seven KIIs and SGIs with national government agencies
- one meeting with an International NGO (World Vision)
- three meetings with traditional leaders (Buganda Kingdom, the Bunyoro-Kitara Kingdom and the Kooki Chiefdom).

At district level:

- 82 KIIs and SGIs with district authorities.

At local level:

- 34 community assembly meetings
- 32 FGDs with community leaders (including parish leaders)
- 39 FGDs with women groups

- 232 KIs and SGIs with community members including local business owners, religious leaders, teachers, traditional healers, fisherfolk, crop farmers, pastoralists, artisanal miners, natural resource users and health workers
- 176 HHIs (including vulnerable people).

Appendix C1 lists stakeholders met during the baseline and impact assessment phase.

Figure 7.5-4 shows the districts and villages engaged with during the baseline and impact assessment phase.

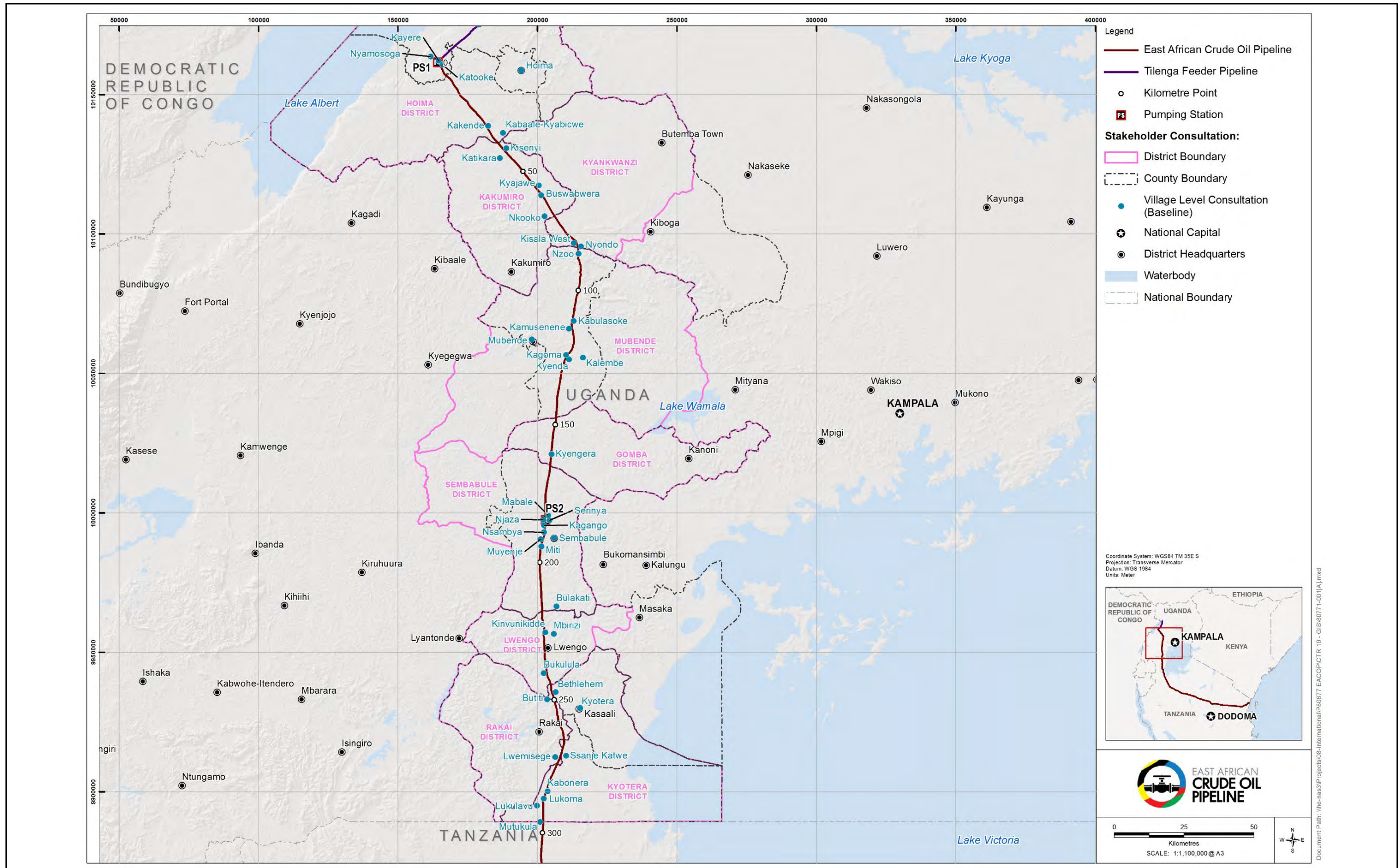


Figure 7.5-4 Districts, Subcounties and Villages Consulted During the Baseline and Impact Assessment Phase

Arranging the Engagement Activities

For meetings with district, subcounty and national government stakeholders, a process similar to the one applied during scoping was used:

- a letter providing an update on the ESIA and stakeholder engagement process was sent by email one week before the proposed meeting. The letters were accompanied by electronic versions of the BID and ESIA information brochures
- the DED of each district directed the DEMO as the liaison person for the ESIA team
- regular phone contact was maintained with the DEMOs to arrange the district, and community meetings in terms of time and location of the meetings, and mobilisation of participants.

For meetings at PAC level, the following process was followed:

- Subcounty leaders were contacted by phone and requested to inform community leaders about the proposed meeting.
- The stakeholder engagement team met with the subcounty and PAC leaders and members. The objectives of these meetings were:
 - to explain the project, the ESIA and potential project impacts, to provide BIDs and to arrange for subsequent meetings with different community groups.
 - to provide a letter introducing the baseline studies (social and environmental)
- The village leaders were requested to mobilise community groupings for follow-up meetings (SGIs, FGDs, KIs).
- A phone call was made to the village leader at least a day in advance to confirm dates, times and venues for the interviews and group discussions.

Engagement Protocol

Community assembly meetings and national meetings followed the same protocol as during the scoping meetings. BIDs and posters were used and distributed during the meetings.

Other stakeholder engagements (FGDs, SGIs, KIs and HHIs) were executed in a less formal manner and combined with data collection. These engagements generally started with a short presentation on the project and the ESIA, followed by a discussion on topics relevant to the livelihood, experience or expertise of the stakeholder, followed by opinions, concerns and suggestions with regards to the project. Appendix C4 presents full records of all formal stakeholder meetings during the baseline and impact assessment phase.

Figure 7.5-5 and Figure 7.5-6 show stakeholder engagement during the baseline and impact assessment phase.



Figure 7.5-5 Stakeholder Meeting at Katikara Village, Kakumiro District



Figure 7.5-6 Stakeholder Meeting at Kabonera Village, Kyotera District

7.5.3 Human Rights Stakeholder Engagement

In addition to the meetings held by the ESIA team, the human rights team conducted meetings with the following stakeholders.

- At national level, meetings were held with:
 - Advocates for Natural Resources and Development (Anarde)
 - African Center for Energy and Mineral Policy (ACEMP)
 - Advocates Coalition on Development and Environment (ACODE)
 - National Association of Women Organisations in Uganda
 - National Association of professional environmentalists (NAPE)
 - Action Aid
 - Advocates Coalition on Development and Environment (ACODE).
- At village/town level, meetings were held with:
 - separate men and women groups in Mutukula, Lukoma, Mbrizi, Sembabule, Serinya, Bugula, Bucuya, Kyenda and Kamusenene
 - cultural leaders at Wajinja Cultural Site
 - Bucuya artisanal and small-scale miners' association
 - Mubende farmers association.

These informal meetings provided opportunities for stakeholders to discuss the project and its potential impacts. Details of stakeholders met are provided in Appendix C1.

7.5.4 Environmental and Social Impact Assessment Pre-Submission Stakeholder Engagement

7.5.4.1 Environmental and Social Impact Assessment Pre-Submission Engagement Objectives

As part of the project's commitment to meaningful engagement with stakeholders in general, and impacted communities in particular, the project stakeholder engagement process includes pre-submission stakeholder engagement before finalisation of the ESIA report. The objective of the ESIA pre-submission stakeholder engagement was to consult with all categories of potentially impacted stakeholders on the draft ESIA findings, specifically, the potential impacts and mitigation measures.

Pre-submission engagement served to:

- inform stakeholders of the preliminary results of the impact assessment and mitigation measures to be applied.
- inform stakeholders of how their concerns had been considered in the draft ESIA.
- receive concerns, comments and recommendations on the impacts and proposed mitigation measures for consideration and incorporation into the final ESIA report for submission to the regulators.

7.5.4.2 ESIA Pre-Submission Engagement Approach

To achieve the pre-submission stakeholder engagement objectives, engagement with key stakeholders was undertaken at:

- *District level*

Targeting technical and political leaders

- *Subcounty level (including town council)*

Targeting technical leaders

- *PAC level*

Where targeted efforts were made to extend invitations to women, elderly, youth and people with disabilities or their representatives to participate in the PAC meetings.

The process used to arrange meetings in the scoping phase was again followed.

Meetings

The pre-submission stakeholder meetings involved project representatives and the ESIA contractor. They were conducted on 6 and 18 June 2018. A total of 355 people participated in 35 meetings. The following meetings were held:

- at district level:
 - nine meetings with district authorities
- at subcounty level
 - 19 meetings with subcounty authorities
- at PAC level
 - 17 community assembly meetings.

Appendix C1 lists stakeholders met during the pre-submission meetings.

Figure 7.5-7 shows the districts, subcounties and villages engaged during the pre-submission meetings.



Arranging the Engagement Activities

For meetings with district, subcounty and PACs, the following process was followed:

- Letters requesting a meeting were sent to districts.
- Phone calls were made to local council chairpersons before the village meetings to confirm the meeting dates, times and venues and to request them to mobilise the village residents.

Engagement Protocol

Community meetings followed a similar protocol to the scoping meetings. Posters and BIDs were used and distributed during the meetings. The project was presented with the most up-to-date information, and impacts and mitigation measures were discussed. This was followed by a question and answer session. Appendix C4 presents full records of all formal stakeholder meetings. Stakeholder comments were considered in the ESIA reporting.

Figure 7.5-8 and Figure 7.5-9 show pre-submission stakeholder meetings.



Figure 7.5-8 District Meeting with Hoima District Technical Planning Committee and Political Leaders



Figure 7.5-9 Community Meeting in Kijjaguzo Village, Mubende District

7.6 Stakeholder Engagement Results

This section presents the main concerns and questions raised by stakeholders during the scoping phase, the baseline and impact assessment phase and the pre-submission meetings and indicates where these concerns are addressed in the ESIA.

Appendix C3 includes a more comprehensive list of the stakeholder concerns and project responses disaggregated for the scoping phase, baseline and impact assessment phase and pre-submission meetings and disaggregated per stakeholder engagement group.

Appendix C4 presents full records of all formal stakeholder meetings held in the scoping phase, the baseline and impact assessment phase and the pre-submission meetings. This does not include the stakeholder comments from the KIIs, FGDs, HHIs and SGIs, as these engagements were more informal and are included in the social field data records.

Figure 7.6-1 provides the percentage of comments from stakeholders (all stakeholder groups combined) across the different categories of concern. The figure indicates that during the scoping phase, the majority (38%) of the project concerns are about socio-economic and health matters. This was also the case during the baseline and impact assessment phase, with 43% of concerns related to

socio-economic and health matters. Similarly, during the pre-submission meetings, most concerns were about socio-economic and health matters (70%). Concerns about the ESIA, project information and stakeholder engagement were also prevalent during both the scoping and baseline and impact assessment phases.

Figure 7.6-2 shows the results from the FGDs with women and with community leaders at PAC level during the baseline and impact assessment phase. The data is disaggregated into concerns and aspirations. From the figure, it can be seen that:

- both community leaders and women have high aspirations with regards to community infrastructure (e.g., building of schools and clinics) and employment
- concerns about loss of land and property are important among community leaders
- concerns about health are important for both community leaders and women.
- comments regarding education were raised by community leaders and women, with aspirations consisting of better access to education services and improved standards of teaching for both children and adults. Concerns raised were focussed on school dropouts.
- in both FGDs, concerns and aspirations were voiced with regards to health. The main areas of concern were the spread of disease (both communicable and non-communicable), teenage pregnancies, accidents (mainly traffic related) and poor sanitation. All aspirations with regards to health consist of better health services and access to improved medicines.
- job opportunities were a major aspiration in FGDs with both community leaders and women.

Sections 7.6.1 to 7.6.4 provide additional information on the concerns, comments and aspirations of the stakeholders and the responses of the project.

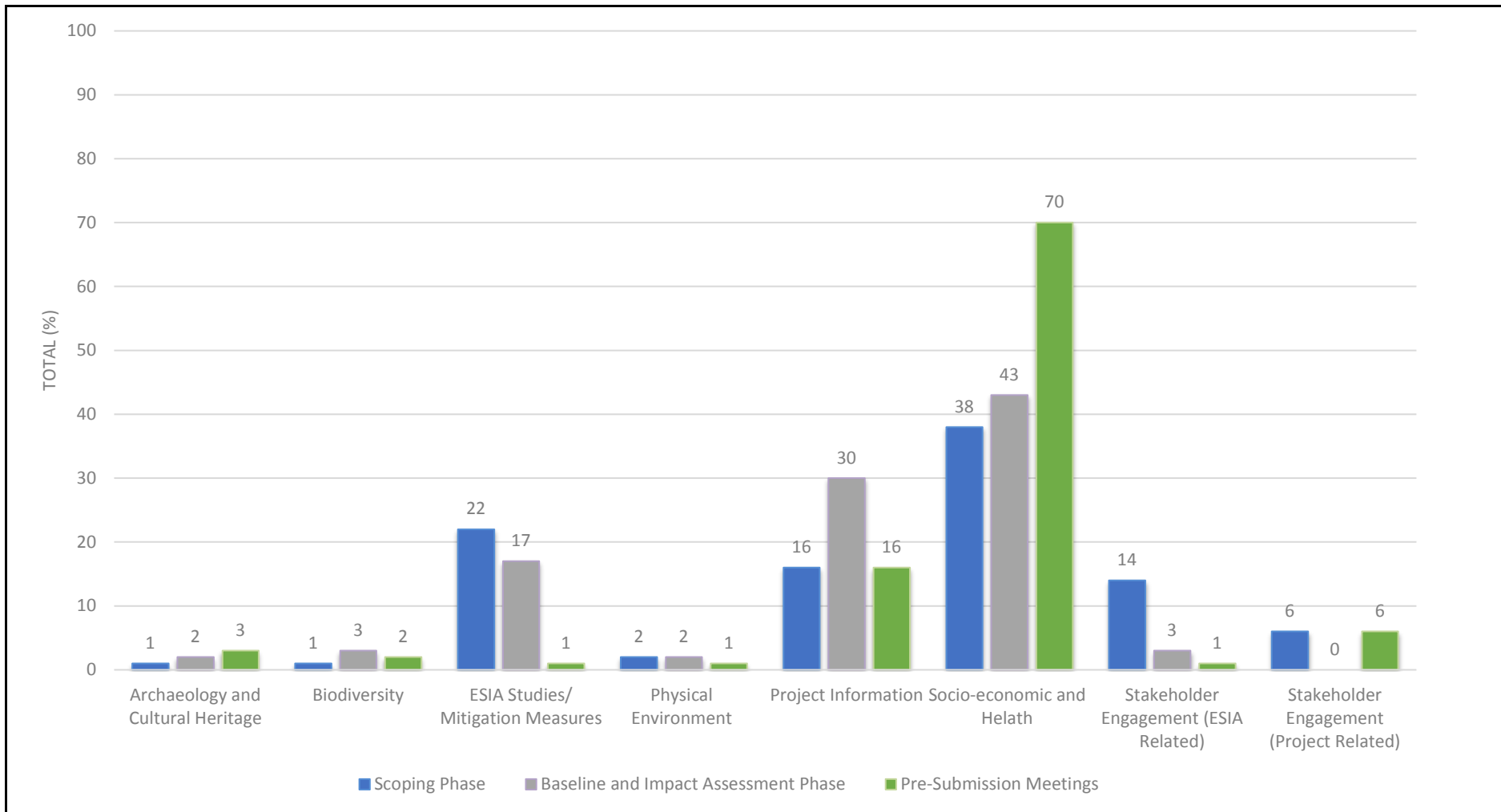


Figure 7.6-1 Grouping of Concerns and Comments by Environmental and Social Impact Assessment Phase

NOTE: The numbers indicate the percentage of concerns raised in that category during the scoping and baseline and impact assessment phases.

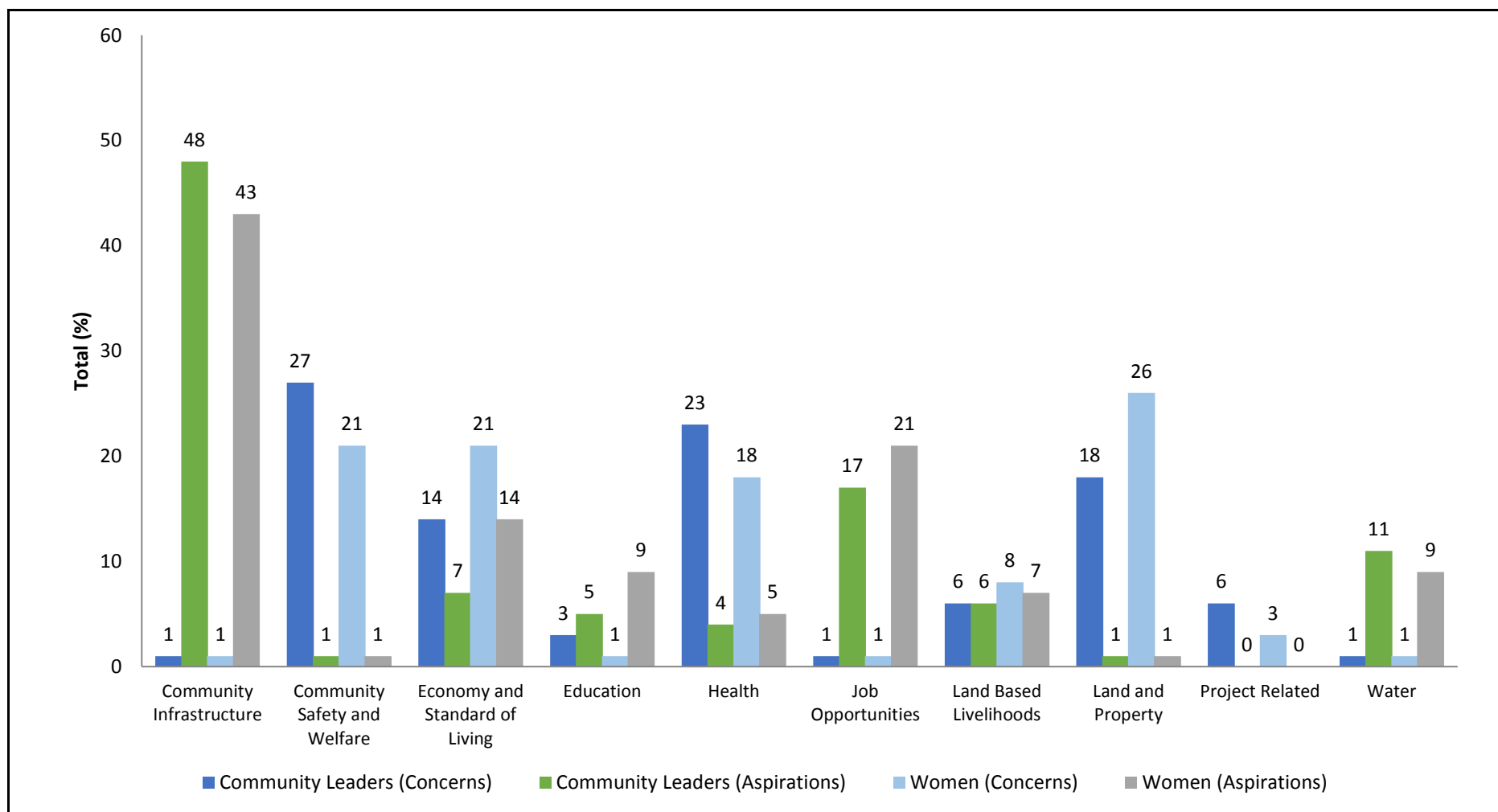


Figure 7.6-2 Grouping of Concerns and Aspirations from Focus Group Discussions during the Baseline and Impact Assessment Phase

7.6.1 Socio-economic and Health

7.6.1.1 Land and Property

Scoping Phase

Concerns Raised

A recurrent concern throughout the engagement for all stakeholder categories was compensation for loss of land, livelihoods and properties.

Stakeholders emphasised the shortage of land in project-affected districts and the difficulty of finding replacement land. Stakeholders indicated that most land for the proposed pipeline route is already under scrutiny of land speculators because of the project, rendering the present occupants of the land more vulnerable. The need to ensure that compensation is provided in a timely manner and project-affected people receive adequate compensation to enable them to rebuild their lives was a constant theme throughout the consultations.

Another key concern was the potential conflict between owners and tenants over project-acquired land. Scoping consultation found that most tenants do not have rental or tenancy agreements with owners, and many owners do not have access to their own title deeds resulting in concerns around security of tenure and rights attached to land use.

The importance of including vulnerable groups, particularly women and children, in all compensation and resettlement-related discussions was emphasised.

Local stakeholders expressed confusion about the project right-of-way (RoW) and sought clarity on whether this would be associated with permanent or temporary land take across the width of the RoW.

Responses Provided

Stakeholders were informed that the project will manage land acquisition by developing a resettlement action plan (RAP) and a livelihood restoration plan (LRP), which will be informed by various socio-economic baseline studies (see Section 6.4.3 and Appendix A9). A resettlement policy strategy has been developed to ensure fair compensation while the livelihood restoration programme will ensure that impacts on livelihoods will be mitigated consistent with national law and international standards (IFC Performance Standard 5, 2012). During the ESIA and land acquisition planning phases, there will be ongoing engagement with project affected stakeholders, including vulnerable groups, to update them on the plans and receive their questions and grievances

Baseline and Impact Assessment Phase

Concerns Raised

As during scoping, all stakeholder categories raised concerns over land acquisition and compensation for loss of land, livelihoods and properties. Clarifications regarding the RoW were sought. The difficulty of identifying replacement land in light of the already existing pressure on land, timing of compensation and

compensation needs for landowners and tenants were also raised. There were also concerns about forced resettlement, choice of host area and livelihood restoration.

Concerns were raised in terms of potential grievances and how these would be handled.

Stakeholders shared negative experiences with regards to resettlement on previous projects. Government projects such as road upgrades have resulted in legacy issues (project-affected people being paid below market rates for land and property, not being paid or being paid after the land or property had been acquired)

Responses Provided

Stakeholders were informed that a resettlement action plan will be developed and agreed with the relevant Ministry. An entitlement framework will be developed to ensure fair compensation while a livelihood restoration plan will be developed to ensure that impacts on livelihoods of tenants and landowners will be mitigated. There will be no forced acquisition of land.

It was further explained that compensation will be provided before construction and appropriate compensation rates will be identified. It was explained that a temporary 30-m RoW would be required during construction and there would be a permanent 10-m RoW for operations.

Pre-Submission Meetings

Concerns Raised

While the presentation at the meeting addressed stakeholder concerns and how these had been addressed and mitigated in the ESIA, stakeholders again raised concerns about the compensation process and emphasised the importance of timely and fair compensation. It was suggested that some affected districts lack approved compensation rates, and that, where rates exist, they are lower than prevailing market prices.

Another concern regarding the handling of vulnerable groups during the compensation process, particularly women and children was raised. The implementation of a mechanism for handling land-related conflicts that may arise due to project activities was recommended.

Clarification was sought on how orphaned land will be handled.

Responses Provided

Stakeholders were advised that concerns related to land acquisition and resettlement will be addressed through the RAP process as described in the ESIA (Section 8.15.1.1 and Appendix L). Stakeholders were further informed that the EACOP project will provide compensation based on rates validated by the chief government valuer and in compliance with national regulations and International Finance Corporation (IFC) performance standards. They were advised that any concerns about district compensation rates will be forwarded to the Ministry of Lands, Housing and Urban Development.

The development of a project grievance redress mechanism (GRM), to ensure that potential land-related conflicts are addressed in a timely manner, was discussed.

Stakeholders were notified that the land acquisition team will determine the handling of orphaned land.

7.6.1.2 In-Migration and Foreign Workforce

Scoping Phase

Concerns Raised

Concerns were raised at the national and regional level meetings on in-migration and influx management in areas close to project construction and operational sites. A common perception was that women and girls could be victimised by construction workers.

Fears regarding construction camps were widespread with the expectation that these may lead to an increase in HIV and AIDS rates, reduce water and electricity availability for the local population, overburden healthcare resources and contribute to family breakdowns.

Responses Provided

Stakeholders were informed that the potential for project-induced in-migration and the associated negative impacts will be addressed in the socio-economic part of the ESIA which includes a health impact assessment and mitigation measures developed.

Baseline and Impact Assessment Phase

Concerns Raised

Stakeholders voiced concerns about in-migration and project-induced in-migration-related impacts, echoing many of the fears expressed during the scoping phase. As for the scoping phase, stakeholders were fearful that women and girls would be lured by construction workers and susceptible to sexual harassment, rape, pregnancy and defilement. Many of the fears were based on experiences with previous projects in the area. Foreign construction workers were perceived to be the main culprits.

Responses Provided

Stakeholders were informed that social management plans (such as camp management and journey management plans) will be put in place to minimise interactions between migrant workers and local communities.

Pre-Submission Meetings

Concerns Raised

On being presented with proposed impacts and mitigations related to in-migration and foreign workforce, stakeholders raised further concerns about PIIM and associated impacts on health facilities and other public services. Questions were asked about potential plans to upgrade the health facilities in PACs to help cope with population increase during the construction period.

Responses Provided

Stakeholders were informed that the impacts and mitigation section of the ESIA (Section 8.18) and a PIIM management plan will be developed to minimise impacts associated with PIIM. The project team will liaise closely with local authorities on issues related to PIIM management. It was explained that the upgrade of health facilities is the responsibility of the Government of Uganda.

7.6.1.3 Community Health and Safety**Scoping Phase*****Concerns Raised***

All stakeholder categories raised community health and safety concerns. A main concern related to the impact of the heated pipeline on people, animals, soils and crops.

Concerns were raised about road safety. It was indicated that Uganda has one of the highest rates of traffic-related fatalities per vehicle in the world, and a major concern was the effect that increased traffic would have on both people (mainly children) and animals. Stakeholders cited speed as being the main cause of fatalities and were worried about construction vehicles sharing roads with local road users.

Responses Provided

Stakeholders were informed that a community health impact study will be undertaken and a community health management plan developed that will address the concerns raised.

Meeting Note: The pipeline is insulated and will be buried more than 1.5 m underground so there would be no impacts arising from heating the pipeline.

The project will also prepare a traffic impact assessment as part of the ESIA, and a more in-depth traffic impact assessment will be prepared as part of detailed engineering studies that will include location specific mitigation measures.

Baseline and Impact Assessment Phase***Concerns Raised***

Stakeholders asked about potential health impacts of the project. Stakeholders at community level were concerned about potential impacts of the project on water quality.

PACs asked about the measures that would be put in place to prevent the spreading of communicable diseases. They were also concerned about the safety of women.

Similar to the scoping phase, stakeholders also asked questions about the heated nature of the pipeline and whether this will impact upon people, animals and crops, among others.

Responses Provided

Stakeholders were advised that water quality will be monitored regularly and alternative community water sources will be provided where access to water sources would be restricted by construction. A camp management plan and journey management plan will minimise interaction between construction workers and communities and health impacts will be monitored. Any criminal offence will be handled according to Ugandan law and a grievance mechanism will be put in place involving community liaison officers and local leaders to address issues such as misconduct of project workers.

Pre-Submission Meetings

Concerns Raised

While stakeholders were presented with project information that showed how impacts related to physical VECs had been addressed in the ESIA, further concerns were raised about the generation of dust during pipeline construction and potential impacts on community health was a key concern among stakeholders. It was suggested that project construction workers should be provided with sanitary facilities to prevent spread of diseases due to unhygienic conditions.

Stakeholders raised questions about security measures to prevent damages to pipeline infrastructure and asked about the risk of pipeline failures causing harm to people, crops and property.

PACs raised concerns about increased crime levels and sought clarification on how the project will deal with this.

Responses Provided

The implementation of a suite of measures within the ESIA impact assessment sections (Sections 8.9 and 8.10) and the pollution prevention plan will minimise impacts such as air and noise pollution. Stakeholders were informed that dust suppression measures will include the use of water to regularly irrigate construction sites.

It was emphasised that project workers will be provided with mobile toilets, in addition to the sanitary facilities that will be established at the camps.

To prevent damages to pipeline infrastructure, an extensive pipeline monitoring and control system will be implemented to detect abnormal situations. Stakeholders were advised that the use of state of the art instrumentation and fibre optic technology along the pipeline route will allow detection of movements along the pipeline. The PPT will liaise closely with security agencies in the country to secure the pipeline corridor of any threats.

Concerns about crime levels were noted and stakeholders were informed that the project will work closely with local leaders and security agencies to ensure safety and security in the PACs.

7.6.1.4 Economy and Standard of Living

Scoping Phase

Concerns Raised

All stakeholder categories were interested in the potential benefits of the project for Uganda as well as for local communities near the project. Local benefits were viewed in terms of employment and training opportunities and the procurement of goods and services. Emphasis was placed on the importance of project compliance with national content requirements to ensure that local skills and labour are used wherever possible. Community stakeholders, however, were concerned that it would be difficult to benefit from employment because of the lack of pipeline and facilities construction and operation skills in the local workforce

Responses Provided

The stakeholder engagement team stated that a national content plan will be developed by the project, compliant with Ugandan requirements, which will include commitments to local procurement, capacity building and employment.

Baseline and Impact Assessment Phase

Concerns Raised

Similar to the scoping phase, stakeholders at community level were concerned about employment opportunities and other benefits, particularly for women and youths.

Responses Provided

Stakeholders were informed that job opportunities will range from casual, unskilled, semi-skilled to skilled. Local people, including the youth and women, will be prioritised for non-skilled jobs.

Besides direct job opportunities, there will be indirect benefits such as road upgrades.

Pre-Submission Meetings

Concerns Raised

Stakeholders were presented with mitigation measures on how impacts related to community and standard of living would be addressed. During the discussions, stakeholders at village level raised showed interest in potential project benefits, particularly in terms of improvement in living standards. Stakeholders asked questions about how local people could benefit from the project, and whether materials such as aggregates will be sourced from the local area.

Stakeholders emphasised that local communities should be prioritised for employment, particularly for non-technical jobs, and for local purchasing of goods and services. Clarification was sought on what training programmes will be put in place to enable local people to gain skills and benefit from the project.

Stakeholders also asked how the rights of the labour force would be protected.

Responses Provided

The development and implementation of a transparent recruitment strategy was emphasised to stakeholders. Stakeholders were informed that the project, as part of the ESIA impacts mitigation process and the procurement and supply chain management plan (ESIA Sections 8.11–8.15), is committed to reinforcing the use of local workers and suppliers. Stakeholders were advised that project benefits will include employment opportunities for skilled and semi-skilled workers, upgrades of some roads, potential growth of small, training programmes and capacity building for local people.

Stakeholders were informed that small businesses and farmers can become part of the supply chain by submitting tenders to supply to the EACOP project. It was explained that aggregates will be sourced from local areas and along the pipeline route during pipeline construction.

Stakeholders were advised that all employment opportunities available during the construction period will be communicated in such a way as to make these employment opportunities available to as many people as possible. The recruitment of workers for non-technical jobs will prioritise local communities.

7.6.2 Physical Environment

Scoping Phase

Concerns Raised

Concerns were raised about potential effects on community water sources. It was feared that the project would need water from community water sources rendering these insufficient to meet local requirements.

There were concerns that the heat from the pipeline would affect the soils and decrease soil fertility or affect crops planted in the 10-m RoW.

Concerns were raised with regards to potential project impacts on air quality and climate change during the construction and operational phases.

Responses Provided

The stakeholder engagement team informed stakeholders that water assessments will be undertaken to ensure that project requirements can be met without affecting local water requirements.

The stakeholder engagement team explained that the engineering team will collaborate with the ESIA team to assess project impacts on air and climate change and identify mitigation measures that may be required; and project engineering team will ensure compliance with applicable emission standards.

Baseline and Impact Assessment Phase

Concerns Raised

No further concerns were raised by stakeholders during the baseline and impact assessment phase.

Pre-Submission Meetings

Concerns Raised

At the district level, stakeholders explained that some PACs depend on unprotected water sources for domestic purposes. They emphasised that the study should consider impacts on unprotected water sources.

Stakeholders also reported that communities are worried about the potentially negative impacts of pipeline activities on soil productivity.

Responses Provided

Stakeholders were advised that the potential impacts on surface water and soil productivity have been assessed and mitigation measures proposed in two sections of the ESIA report. The implementation of a suite of measures within the ESIA impact assessment sections (Section 8.6) and the pollution prevention plan will minimise impacts on surface water sources.

Landscape

Stakeholders were shown illustrations of typical project infrastructure and their responses recorded. The responses suggest that stakeholders did not perceive proposed project infrastructure as negative visual intrusions in the landscape.

7.6.3 Biodiversity

Scoping Phase

Concerns Raised

Stakeholders raised concerns about the impact of the project on Lake Albert fisheries and animal and plant biodiversity in the project area.

Impact on ecosystem habitats during construction of the pipeline was raised mostly in national consultations.

Impacts, particularly during the construction phase, on sensitive ecosystems such as forests, wetlands and wildlife reserve, which are habitats for several animal species was a concern.

Concerns were also raised regarding connectivity to protected areas and potential impacts on endemic species.

Responses Provided

Stakeholders were informed that biodiversity studies and an ecosystem services study will be undertaken to assess project impacts on aquatic and terrestrial animals and plants, the extent to which humans depend on these resources and that mitigation measures will be developed where impacts are identified.

Baseline and Impact Assessment Phase

Concerns Raised

As during the scoping phase, concern was raised about impact on interconnectivity for migratory species.

Responses Provided

Stakeholders were informed that the selection of the pipeline route included consideration to avoid environmental and social sensitivities and that the pipeline will be constructed along existing infrastructure corridors where feasible.

Pre-Submission Meetings

Concerns Raised

Stakeholders were presented with information from the ESIA that showed how potential project. At the district level, stakeholders asked questions about what measures will be put in place to ensure that loss of biomass (especially tree cover) is addressed. Stakeholders explained that their district tree planting project could help to address the issue of loss of biomass.

There was concern among district level stakeholders about potential impacts on forest resources; it was suggested that the EACOP project team should liaise with the district natural resource department to assess the number of trees destroyed so they can be replanted at another location.

Stakeholders emphasised the need for the study team to conduct a biodiversity risk assessment to quantify biodiversity loss and determine how the loss can be compensated.

Stakeholders sought clarification on the size of the construction corridor in ecologically sensitive areas.

Responses Provided

Stakeholders were informed that mitigation measures relating to loss of biodiversity are outlined in the ESIA report (Sections 8.2–8.4). Stakeholders were assured that a biodiversity risk assessment has also been included in the ESIA and a biodiversity management plan developed to address issues related to loss of biomass. It was emphasised that the project aims for no net loss for biodiversity.

Stakeholders were advised that, in ecologically sensitive areas, the project footprint will be reduced to a 20-m corridor to minimise impacts.

7.6.4 Project and Environmental and Social Impact Assessment Related Matters (Including Environmental and Social Impact Assessment Stakeholder Engagement)

Scoping Phase

Concerns Raised

Stakeholders raised questions about the grievance procedure, project community liaison officers (CLOs) and the process for providing feedback after the completion of field surveys and the ESIA. Recommendations were made on communication channels with local communities, new stakeholders to include in the next round of consultations, and the protocol for meetings, particularly about per diem payments for meeting attendance.

Responses Provided

The stakeholder engagement team provided project background information documentation, which includes information on stakeholder communication. They indicated that stakeholder engagement planning for the next phases will be revised to integrate recommendations received.

Baseline and Impact Assessment Phase***Concerns Raised***

Questions were asked about the ESIA schedule, the approval process for the scoping report, a definition of the area of influence and the grievance mechanism.

Stakeholders also requested information about project design and pipeline routing. Recommendations were made by stakeholders with regards to disaster preparedness.

Suggestions were made to involve the Chief of Defence, the Office of Prime Minister and the Chamber of Mines. Recommended were also made to run radio programmes to sensitise communities.

Responses Provided

Responses from the stakeholder engagement team included information on the envisaged ESIA submission, the process regarding approval of the scoping report, women participating in the ESIA process and audits to be undertaken on the efficacy of the grievance mechanism. Feedback was also provided on project design such as pipeline routing, pipeline insulation and markers, oil spill contingency and emergency response planning as well as security planning and the grievance mechanism. The recommendations by stakeholders were noted for consideration.

Pre-Submission Meetings***Concerns Raised***

Stakeholders raised concerns about the grievance procedure, explaining that vulnerable persons may not have their grievances properly addressed. It was recommended that the grievance procedure should include a procedure of capturing photos of the aggrieved persons, and that the aggrieved party should be provided with an acknowledgement to indicate that a grievance has been recorded.

Stakeholders at the district level asked how local governments can ensure that the proposed mitigation measures are enforced. Clarification was sought on why studies target a wide range of people, rather than only those directly affected by the project.

Stakeholders recommended that GPS coordinates of the pipeline route should be shared with the subcounty authorities so that local leaders can protect local people from land speculation and land grabbers.

Stakeholders asked if unplanned events and cumulative impacts will be addressed in the ESIA.

Responses Provided

Stakeholders were advised that there are various levels of handling grievances within the grievance procedure. It was explained that a database will be developed for

recording grievances, which will include details about the aggrieved person/entity. Stakeholders were informed that the aggrieved party will be provided with an acknowledgement form to indicate that a grievance has been received and recorded.

Stakeholders were informed that district environmental officers are mandated to conduct regular inspections and monitoring to ensure that mitigation measures are implemented. The importance of maintaining a relatively large area, when assessing environmental and social impacts, was discussed with regards to the need to establish an understanding of the baseline conditions.

It was emphasised that the districts, subcounties and villages through which the pipeline will pass have been identified, but that the exact route will only be finalised once studies have been completed (ESIA and G&G). The affected districts will be informed of the exact route during the RAP process and pre-construction surveys.

It was confirmed that unplanned events and cumulative impacts will be addressed in the ESIA.

7.7 Grievance Procedure

In April 2017, the EACOP PPT established a nonjudicial project grievance procedure to ensure any complaint raised by a stakeholder will be registered and handled properly to guarantee its resolution. The grievance procedure is compliant with the United Nations Guiding Principles on Business and Human Rights effectiveness criteria for project level grievance mechanisms.

The grievance procedure describes the process available to stakeholders for lodging a grievance during pre-construction, construction and project operations.

The grievance procedure is readily accessible to all stakeholders at no cost and without retribution. The mechanism does not impede access to judicial or administrative remedies.

The project's grievance procedure has been presented to stakeholders during each consultation phase and is managed by EACOP staff (CLO and grievance administrator).

The grievance management process requires the following steps by EACOP:

- receive
- register
- investigate
- response.

Figure 7.7-1 outlines the grievance procedure.

Stakeholders are provided with several methods of communication to report a grievance to ensure that the grievance mechanism is inclusive and culturally appropriate: verbally, in an e-mail or via post. In any case, a grievance form shall be filled with the help of CLOs and signed by the complainant and his witness.

Any grievance is registered in the grievance database, reviewed and responded to. The grievance administrator will follow up and ensure the different timings for the different steps of resolution are respected.

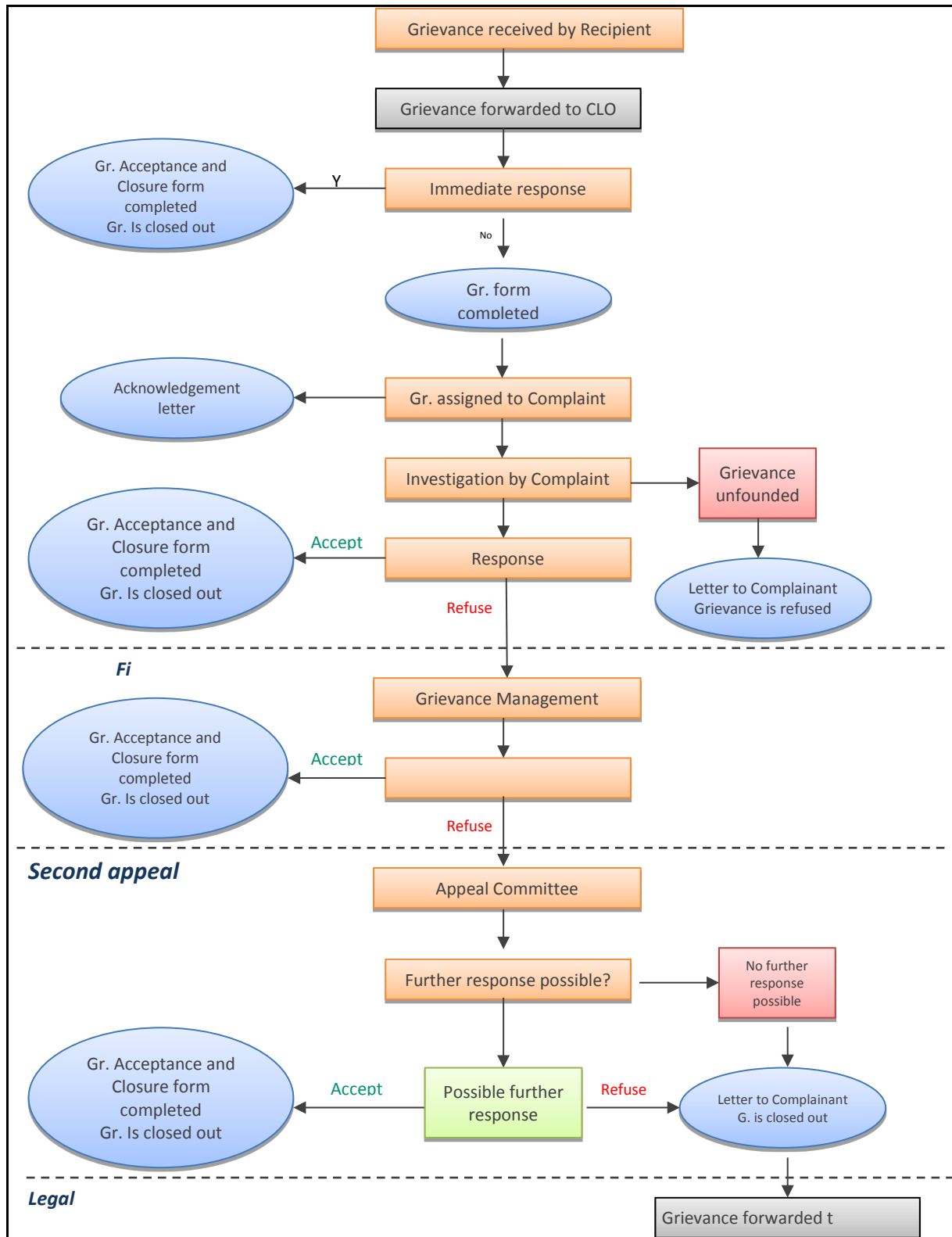


Figure 7.7-1 Project Grievance Procedure

7.8 Government Environmental Impact Statement Disclosure

The developer will submit the environmental impact statement (EIS) to the Executive Director of NEMA in accordance with Regulation 17 of the National Environment EIA Regulations, 1998.

As part of the review process, the Executive Director will transmit the EIS to a lead agency for comments on the EIS within 30 working days.

Within ten days of receiving the comments from the lead agency, the Executive Director will invite the general public to make written comments on the EIS, including comments from persons specifically affected by the project.

Thereafter, the Executive Director will consider the EIS and all the comments received and determine whether a public hearing be held in accordance with Regulation 22 of the Environment Impact Assessment Regulation, 1998 under section 107 of the National Environmental Act Cap 153.

The public hearing will be presided over by a suitably qualified person known as a presiding officer appointed by the lead agency in consultation with the Executive Director. The date and venue of the public hearing will be advertised through the mass media to bring it to the attention of persons most likely to be affected by the project.

Any interested party who has requested to make formal presentations can make presentations following the initial presentation by the developer in accordance with the EIA Public Hearings Guidelines 1999. The developer will also have a chance to respond to the questions raised in the hearing.

On the conclusion of the public hearing, the presiding officer will make a report of the views presented at the public hearing and make factual findings to the lead agency and the Executive Director within thirty days from the day on which the public hearing was concluded.

Thereafter, the Executive Director makes a decision about the project taking into account the whole review process. The Director may:

- (a) approve the project or part thereof
- (b) require that the project be re-designed including directing that different technology or an alternative site be chosen
- (c) refer back the project or part thereof to the developer where there is insufficient information for further study or submission of additional information as may be required to enable the Executive Director to make a decision, or
- (d) reject the project.

A decision of the Executive Director under this regulation shall be communicated to the developer within fourteen days of the decision.

7.9 Ongoing Stakeholder Engagement

7.9.1 Post-Environmental and Social Impact Assessment Submission Stakeholder Engagement

The project will conduct ongoing stakeholder engagement after submission of the ESIA report.

The objective of these engagements will be to:

- further discuss the results of the impact assessment, including the cumulative impact assessment and mitigation measures
- discuss how stakeholder concerns have been considered in the ESIA.

To accomplish the objectives, key stakeholders identified in the scoping, baseline and impact assessment phase and pre-submission meetings will be targeted. This will include key national government authorities and NGOs and government stakeholders in all the districts and all the subcounties crossed by the project. Community leaders (women and men) of a sample of PACs will be gathered at subcounty and village level for engagement.

The engagement strategy will also include targeted engagement with identified vulnerable stakeholders (such as pastoralists, fishing communities and communities with a significant presence of landless community members) or their representatives (such as mothers, health workers or school teachers to represent the perspectives of children as appropriate).

Meetings will be arranged as per the agreed protocol during the previous phases. Information materials on the ESIA outcomes in English and local languages where appropriate (such as information brochures, nontechnical summaries of the ESIA, posters and PowerPoint presentations) will be used for the meetings.

As described in some of the cumulative impact assessment parts of Section 8, liaison will be undertaken with the developers of third-party projects where there could be a significant cumulative impact.

The results of these engagements will be documented in a stakeholder engagement report.

Engagement activities will be adjusted to reflect evolving project activities, stakeholder preferences and concerns over the life of the project. The project will also seek to build partnerships with NGOs, CSOs and communities to support the development and implementation of practical impact management strategies ranging from benefit sharing to monitoring.

The grievance procedure will continue to provide opportunities for stakeholders and project-affected communities to express grievances about project activities.

A stakeholder engagement monitoring and evaluation programme will be developed to ensure efficient and effective stakeholder engagement.

7.9.2 Community Engagement

Before the construction phase of the EACOP project begins, local community offices will be established at appropriate locations along the pipeline route to allow stakeholders direct access to CLOs.

Regular meetings with PAC representatives will be held before and when construction is active in their area to:

- communicate construction schedules and activities to those affected
- manage expectations and reduce conflicts
- receive and manage grievances
- define matters of land take, user rights and access
- ensure participation in project implementation, as needed
- communicate on project's health, safety, and security procedures and requirements concerning the communities.

Additional meetings will be held when the need arises (e.g., discontent, conflicts, incidents).

Regular meetings will be held with the district council technical teams, including health management teams to discuss potential health and other issues related to the development of the project and to proactively plan and coordinate the development and implementation of community programmes.

The project will reinforce its engagement with vulnerable groups. The objective is to ensure inclusive engagement reaches all vulnerable groups and to adapt engagement techniques to facilitate that objective, such as through using small group meetings, focus groups, women field team members, providing additional translation and selecting accessible locations for engagement activities.

A community liaison log (meeting minutes) will be maintained detailing the content of all meetings with PACs.

7.9.3 Community Awareness Programmes

Community awareness programmes will be developed and implemented to raise awareness of PACs to matters including but not limited to:

- employment and training opportunities. The project will develop a campaign focused on providing realistic community expectations with regards to livelihood restoration options and employment opportunities. This is to avoid that people make livelihood decisions based on incorrect information.
- risks associated with construction activities and construction camps and measures to protect health, safety and security
- financial literacy
- gender-based violence and alcohol abuse
- road safety awareness
- importance of staying at school (in schools)
- children's rights
- HIV and sexually transmitted diseases (for communities and project drivers).