

Laikipia Conservancies Association Carbon Project

Preliminary Stakeholder Engagement Plan including Free, Prior and Informed Consent (FPIC) Process

Report submitted to the Laikipia Conservancies Association by The Landscapes and Livelihoods Group
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1. Definitions

Benefits – refers to positive impacts which should be identified using a participatory and transparent process. Benefits include those that are direct and indirect and include those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources (CCB v3.1).

Costs and risks – equates with negative impacts which should be identified using a participatory and transparent process. Costs and risks include those that are direct and indirect and include those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs (CCB v3.1).

Communities¹ – All groups of people—including Indigenous Peoples, mobile peoples and other local communities—who derive income, livelihood or cultural values and other contributions to well-being from the project area at the start of the project and/or under the with-project scenario. In cases where numerous small communities can be shown to have homogeneous patterns of social organization, political structure and livelihoods, these communities may be identified and listed as a community. In identification of communities, it is permitted to consider significance of user populations and of their level of use such that distant or intermittent user groups who have very limited dependence on the site need not be defined as communities (CCB V3.1).

Community groups – Sub-groups of communities whose members derive similar income, livelihood and/or cultural values and other contributions to well-being from the project area and whose values are different from those of other groups, such as Indigenous Peoples, women, youth or other social, cultural and economic groups. The number of appropriate groups will depend on the size and complexity of the community (CCB V3.1).

Community property – Collective rights, both customary and statutory, to lands, territories, and resources that communities have traditionally owned, occupied or otherwise used or acquired whether or not such ownership has been formally recorded² (CCB V3.1).

Consultation – Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. Consultations must be gender and inter-generationally sensitive with special attention to vulnerable and/or marginalized people and must be conducted at mutually agreed locations and through representatives who are designated by the groups themselves in accordance with their own procedures. Different approaches may be appropriate for different community groups or other stakeholders. communities and community

¹ Note that the definitions provided here are based on the CCB Standards and should be considered and adapted in relation to Kenyan legislation. For example, the Community Lands Act (2016) defines community as “In the Act, a community is defined as “a consciously distinct and organized group of users of community land who are citizens of Kenya and share any of the following attributes: (a) common ancestry; (b) similar culture or unique mode of livelihood; (c) socio-economic or other similar common interest; (d) geographical space; (e) ecological space; or (f) ethnicity” (Republic of Kenya, 2016a: 528).

² See further details in Food and Agriculture Organization of the UN, Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, Principle 3.1, 2012 (available at: <http://www.fao.org/docrep/016/i2801e/i2801e.pdf>)

groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. Consultations must include participatory identification of ecosystem services important for communities and high conservation values, for example through participatory mapping. Consultations must also include an evaluation of the type and magnitude of impacts resulting from project activities (CM2.1). Consultations must also include a participatory design of feedback and grievance redress procedures (G3.8) (CCB v3.1).

Customary rights – Customary rights to lands, territories and resources refer to patterns of long-standing community lands, territories and resource usage in accordance with Indigenous Peoples’ and local communities’ customary laws, values, customs and traditions, including seasonal or cyclical use, rather than formal legal title to lands, territories and resources issued by the State³ (CCB V3.1).

Documentation – CCB state that full project documentation includes project description and monitoring reports, as they become available, through the project lifetime (CCB v3.1).

Free, Prior and Informed Consent – Free means no coercion, intimidation, manipulation, threat and bribery; Prior means sufficiently in advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes; Informed means that information is provided that covers (at least) the following aspects i) The nature, size, pace, reversibility and scope of any proposed project or activity; ii) The reason/s or purpose of the project and/or activity; iii) The duration of the above; iv) The locality of areas that will be affected; v) A preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle; vi) Personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees and others); and vii) Procedures that the project may entail; and Consent means that there is the option of withholding consent and that the parties have reasonably understood it. Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined (CCB v3.1).

Grievance – Dispute with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation (CCBV3.1).

Impacts – Includes benefits, costs and risks, including those that are direct and indirect and including those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs. Note that the term ‘benefits’ refers to positive impacts and the phrase ‘costs and risks’ equates with negative impacts (CCB v3.1).

³ See further details in World Bank Operational Manual, OP 4.10 – Indigenous Peoples, 200, available at: <https://policies.worldbank.org/sites/ppf3/PPFDocuments/090224b0822f89d5.pdf>

Indigenous Peoples – Indigenous peoples are inheritors and practitioners of unique cultures and ways of relating to people and the environment. They have retained social, cultural, economic and political characteristics that are distinct from those of the dominant societies in which they live (Plan Vivo Standard, V5.0).

Marginalized people – ‘Marginalized’ people or groups are those that have little or no influence over decision-making processes. Marginalization may be related to a range of factors including age, gender, ethnicity, socio-economic status and religion (CCB V3.1).

Other stakeholders – All groups other than communities who can potentially affect or be affected by the project activities and who may live within or outside the project zone (CCB v3.1⁴).

Participation – Full and effective participation means meaningful influence of all relevant rights holder and stakeholder groups who want to be involved throughout the process, and includes access to information, consultation, participation in decision-making and implementation and free, prior and informed consent (CCB v3.1).

Secondary stakeholders – Stakeholder with an indirect interest in the Project. For example, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, and others who have a more indirect interest in the project (Plan Vivo Standard, V5.0).

Property rights – Statutory and customary tenure/use/access/management rights to lands, territories and resources and ‘property rights holders’ are the entities that have individual or collective property rights (CCBV3.1).

Stakeholders – Any Individuals or groups affected by the project or who have potential to influence it (Plan Vivo Standard, V5.0).

Vulnerable and/or Disadvantaged People – Individuals who may be more likely to be adversely affected by the Project’s impacts and/or more limited than others in their ability to take advantage of the Project’s benefits. These individuals may be more likely to be excluded from participating in the Project and may require specific support to do so. These individuals may also be Marginalised (Plan Vivo Standard, V5.0).

⁴ Note that this is not dissimilar to the Plan Vivo (V5.0) definition of ‘local stakeholders’ (an individual or group that is resident within the Project Region and could be affected by Project activities).

2. Purpose

The Laikipia Conservancies Association (LCA) is a member-led organisation comprised of 28 conservancies (20 private and 8 community managed), covering a total of 350,000 ha that supports 11,919 households. It's mission is to support and strengthen these conservancies with the vision of a connected and well-managed Laikipia landscape that conserves nature and improves people's lives. LCA is now pursuing development of a carbon project in this landscape and would like to develop a presentation they can use to engage and educate LCA communities on the basics of carbon finance.

The purpose of this Preliminary Stakeholder Engagement Plan is to identify the stakeholders that should be engaged during the carbon project concept development phase, and provide an overview of the initial Stakeholder Engagement Plan including an FPIC process that should be followed during project development. This will enable LCA to respect rightsholders internationally recognised rights to Free Prior and Informed Consent (FPIC), and contribute to a sustainable and successful project, while ensuring alignment with carbon standards and international good practise and law.

This document briefly describes activities for identification, analysis, and engagement of stakeholders in the Laikipia Conservancies Association (LCA) carbon project that meets the stakeholder engagement and FPIC requirements of both the Plan Vivo Standard (V5.0) and the Climate, Community and Biodiversity Standards (CCBS) (V3.1), noting that there are some differences in terminology and requirements between the Standards.

3. Scope of stakeholder engagement

The Plan Vivo and CCBS requirements, and basic principles on stakeholder engagement and FPIC are outlined below.

3.1 Standards

The CCB and Plan Vivo requirements that are specific to stakeholder engagement are listed in Table 1. These are the requirements specific to stakeholder engagement, but in reality, as stakeholder engagement cuts across a number of other activities (land use mapping, HCV etc), this stakeholder and community engagement strategy is linked to a number of other requirements. The FPIC requirements are illustrated in Table 2.

Table 1 Stakeholder engagement information required in a CCB Project Design document (CCB PD) and Plan Vivo Standard requirements and related sections of this protocol.

Requirement*	Standard	Section of this plan
Explanation of the process of stakeholder identification and analysis, which should include an assessment of rights, interests and relevance to the project, used to identify communities, community groups within them, and other stakeholders (CCB PD Section 2.1.6).	CCBV3.1	Section 4; method still to be included (see Section 3.3)
List all communities, community groups, and other stakeholders, including a description of how each stakeholder was identified and their relevance to project activities. For grouped projects, identify communities that may join the project (CCB PD Section 2.1.7).	CCBV3.1	Section 4 & Annex 1,
Description of informational meetings with communities and local stakeholders and how they were publicized (CCB PD Section 2.3.3).	CCBV3.1	To be included
Explanation on how relevant and adequate information about potential costs, risks and benefits to communities – identified using a participatory and transparent process – has been provided to communities in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project (CCB PD Section 2.3.4).	CCBV3.1	To be included
Documentation of the project’s grievance redress procedure. Demonstration that the procedure includes a) process for receiving, hearing, responding to and attempting to resolve grievances within a reasonable time period, which takes into account traditional conflict resolution methods; b) three stages, each with reasonable time limits: attempt at resolution, mediation and arbitration or courts (CCB PD Section 2.3.12).	CCBV3.1	Section 6 Error! Reference source not found.
Description on how the feedback and grievance redress procedure is publicized and accessible, and how grievances and project responses are documented and made publicly available (CCB PD Section 2.3.13).	CCBV3.1	Section 6 Error! Reference source not found.

<p>Documentation that shows the project has approval from appropriate authorities (CCB PD Section 2.5.8).</p>	CCBV3.1	<p>To be included Error! Reference source not found.</p>
<p>2.1 Stakeholder analysis 2.1.1 All Stakeholders that could influence or be affected by the Project must be identified and categorised as either Local Stakeholders or Secondary Stakeholders. 2.1.2 All Indigenous Peoples and local communities with statutory or customary rights to land or resources in the Project Area(s) must be identified, and their governance structure and decision-making processes must be described with details of the involvement of women and marginalized or vulnerable groups. 2.1.3 Any past or ongoing disputes over land or resources in the Project Area(s) must be identified and described, with details of how they were or will be resolved.</p>	PVV5.0	Section 4
<p>2.5 Stakeholder consultation 2.5.1 The Project must have a Stakeholder engagement plan that is commensurate with the scale and risk of the project and that uses differentiated measures, where necessary, to engage Vulnerable and/or Disadvantaged People. 2.5.2 The Project Coordinator must inform all Stakeholders of the Project during the Project design phase and consult with all Local Stakeholders throughout the Project Period. 2.5.3 All Stakeholders, including men, women, youth, and other important social axes of differentiation, must have the opportunity to provide feedback on the Project Interventions and Project Logic prior to finalization of the project design. 2.5.4 All Local Stakeholders must be provided with updates on the Project at least once per year during the Project Period. 2.5.5 Consultation approaches must be appropriate to the capacity of the Stakeholders, for example written material should be provided in the preferred language of the Stakeholders and workshops or meetings should be used when required to fully explain the Project and its impacts. 2.5.6 All Stakeholders must have the opportunity to provide feedback and raise issues or concerns about potential negative impacts of the Project throughout the Project Period (see Section 2.6), through a transparent and accessible Grievance Mechanism (See Section 3.17).</p>	PVV5.0	Section 5

3.2 Scope of stakeholder engagement

3.2.1 Good practice stakeholder engagement

The LCA stakeholder engagement approach includes the identification and analysis of stakeholders during the project design, listing all relevant stakeholders and analysing each in relation to their potential interest in and influence on the project, as well as the project's potential impact (positive and negative) on them. The engagement then involves the project actively obtaining input from a broad spectrum of stakeholders at local, regional, national and international levels, with particular emphasis on Project Affected Peoples, through meaningful consultation.

Through this process, the project should provide stakeholders with adequate, clear, timely and consistent information regarding the Project and Project activities, including impacts and opportunities that may arise and proposed management measures/ solutions, as well as the manner in which they can participate in this process. This process should provide sufficient opportunity for stakeholders to raise issues, make suggestions and voice their concerns and expectations with regard to the Project.

In addition to sharing information and exchanging, the engagement process should build capacity among stakeholders to enhance their ability to interpret the information, as well as to contribute their issues of concern and suggestions for enhanced benefits.

Beyond the project design period, this engagement will flow through into project implementation, and include working directly with stakeholders and in particular, the Project Affected Peoples, to ensure that concerns and aspirations are consistently understood and considered. During implementation this also includes providing stakeholders with timely feedback on whether and how their inputs were incorporated into project decisions particularly relating to management measures and strategies for enhancing benefits, and including the effective and timely management of any grievances related to the project.

While there are specific requirements relating to stakeholder engagement, as shown in Table 1 above, the approach should be one that is socially and culturally appropriate, builds strong relationships between LCA and it's stakeholders, and creates an atmosphere of mutual understanding, respect, trust and collaboration. This form of engagement will ensure project beneficiaries and affected people develop a strong sense of ownership in decision-making and the project design, and also manage expectations through this process.

A method for stakeholder identification and analysis, and importantly, the assessment of statutory and customary rights, will be developed. A summary is provided in Section 3.3.

3.2.1 Determining level of engagement

The level of engagement typically varies based on the interest, influence and degree of affectedness of the stakeholder in question.

From a project design perspective, the level of engagement can be determined by looking at the level of interest (stake) and influence (power), as per Tab 2 in Annex 1 (stakeholder spreadsheet). This type of analysis typically identifies:

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

Furthermore, from a rights-based perspective, and in accordance with the Standards referred to above, the level of engagement ranges based on people’s rights, with the strongest and most meaningful engagement being targeted at rights-holders, who are typically local communities and indigenous peoples (but not always), followed by other stakeholders (or ‘local stakeholders’) who can potentially affect or be affected by the project activities and who may live within or outside the project zone⁵, and then secondary stakeholders who have an indirect interest in the project, such as national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, and others who have a more indirect interest in the project (Plan Vivo Standard, V5.0). In some instances, detailed below, rightsholders will have the right to Free, Prior and Informed Consent (FPIC).

3.3 Scope of Free, Prior and Informed Consent (FPIC)

It is good practice to follow an FPIC process for any projects that involve or affect indigenous peoples and local communities. A definition of FPIC is provided above.

Different Standards have different ‘triggers’ for when FPIC is formally required, ie. when FPIC is a compliance requirement. For example, the World Bank Environmental and Social Framework (2017) indicates that FPIC is only required when the rights or wellbeing of Indigenous Peoples is affected by a project. The IUCN Environmental and Social Management System (ESMS: 2016), on the other hand, applies FPIC to all conservation activities occurring on the customary land or territories of both Indigenous People and Local Communities, regardless of potential impact.

The CCB Standards, Section 5.3 (legal status and property rights), require that FPIC is “*sought and obtained from relevant property rights holders where rights are affected by the project, and that there is no involuntary removal or relocation of property rights holders from their lands or territories*” (CCB PD Section 2.5.3 and 2.5.4).

Therefore, in CCB projects, FPIC does not apply solely to Indigenous Peoples, but to:

- Property rights holders

⁵ Note that because community stakeholders live outside of a conservancy or specific area, does not necessarily mean they will be considered ‘other stakeholders’, as if they have customary rights over the use, management, or access to land and resources (such as traditional grazing routes and drought grazing areas), they would be considered rightsholders. Note that a cursory review of the NRT project suggests that herders who do not reside within a particular conservancy, or outside of project conservancies, are referred to as ‘off project communities’. In the case of LCA, consideration is needed of the groups, in the case that they have legitimate customary claims.

- Whose rights are affected by the project.

CCB defines property rights holders as “*as statutory and customary tenure/use/access/management rights to lands, territories and resources and ‘property rights holders’ are the entities that have individual or collective property rights*”, which therefore encompasses customary use and access for pastoral or other natural resource-based activities, within LCA.

The key idea is therefore that rightsholders are defined both in terms of their statutory rights (ie. what is foreseen in the law, such as the Community Land Act, 2016), and customary land, use, access and management rights, including for example the use of traditional dry season grazing areas.

In CCB projects, where property rights holders are potentially affected, they should provide their FPIC to the project and associated activities, as per the details of G5.2 in Table 2. In cases where there is potential for relocation (physical displacement of settlements or assets) or livelihood displacement (economic displacement of activities, or productive livelihood assets including farmland or pasture), in addition to seeking the FPIC from rightsholders, there is also the requirement for ‘just and fair compensation’, which would be part of the FPIC agreement. Note that the nature and access to this compensation for affected people is likely to be different from the overall benefit-sharing mechanism for the project. This compensation could be delivered via a livelihood restoration plan, for those cases where the impacts are on peoples’ livelihood activities. This idea of compensation is not dissimilar to the requirements of World Bank Environmental and Social Standards, such as WBESS5.

In Plan Vivo projects, Free, Prior and Informed Consent is required from all Indigenous Peoples or local communities with statutory or customary rights to use land or resources within the Project Area(s) (Plan Vivo, V5.0). Requirement 2.6.1 states that projects must follow an FPIC process that enables Indigenous Peoples and local communities with statutory or customary rights to land or resources in the project area(s) to negotiate the conditions under which the project is designed, implemented, monitored and evaluated.

In order to define who FPIC will apply to in the LCA project, it will be necessary to:

- 1) **Identify property rights holders:** this can be done through a land rights and land use assessment on a project level, and on a conservancy-level. On a conservancy level, this can involve conducting participatory land use and land rights mapping, in order to understand customary tenure, use, access and management rights to lands, territories and resources⁶. These mapping and assessment activities can be readily combined with other required activities, such as the High Conservation Value identification and assessments, which also benefits from participatory mapping exercises. While these activities can readily occur with

⁶ Relevant CCB requirements include: 5.1 “Describe and map statutory and customary tenure/use/access/management rights to lands, territories and resources in the project zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and taken by the project to help to secure statutory rights. Demonstrate that all property rights are recognized, respected and supported”. Note that Customary rights are defined as “[61] ‘Customary rights’ to lands, territories and resources refer to patterns of long-standing community lands, territories and resource usage in accordance with Indigenous Peoples’ and local communities’ customary laws, values, customs and traditions, including seasonal or cyclical use, rather than formal legal title to lands, territories and resources issued by the State. (See: World Bank Operational Manual, OP 4.10 – Indigenous Peoples, 200, available at: <https://policies.worldbank.org/sites/ppf3/PPFDocuments/090224b0822f89d5.pdf>)”.

local communities resident within the conservancy, whose rights are clear, in the case of local stakeholders who either reside outside of the conservancy but use the conservancy, transit through the conservancy, have encroached and settled within the conservancy, or otherwise have claims of customary or other rights, there would need to be a mechanism to check their rights and status, as early on in the process, in order to understand how to engage. Ideally, this would be through direct consultation with these groups, as interpretations of traditional use areas can vary between groups.

- 2) **Conduct an impact assessment:** this will define which, if any, property rights holders’ rights will be affected by the project, and what (if any) mitigation measures (including compensation) could be incorporated as part of the FPIC agreement. For a Plan Vivo project there does not need to be any affect on rightsholders for FPIC to be required, whereas in CCB projects, there would need to be an affect on rightsholders.

It is worth adding that while the CCB Standard might not require FPIC from non-rightsholders, there is still a need to identify potential impacts on these groups, and to mitigate these to ensure no net adverse impacts. As such, in the engagement section, non-rightsholders are marked as ‘participation in development and monitoring of mitigation measures’. How this is conducted in practice, where these groups might not be afforded statutory rights, or be perceived as part of any future benefit-sharing mechanism, is to be determined.

Activities 1 & 2 above will help ascertain who the FPIC rightsholders will be in any given conservancy. In the meantime, it is likely that the following groups are likely to be within scope of FPIC:

- Individuals and communities within the conservancy with customary rights to the use or land and natural resources, who could be affected due to changes in management practices, access, or escalation of human wildlife conflict, for example.
- Individuals and communities from outside the conservancy who have legitimate customary claims to land and natural resources within the conservancy area. In some cases, these could include Samburu and Maasai communities with traditional grazing areas or transit routes, to be determined.

Table 2 lists out the key FPIC requirements from the CCB and Plan Vivo Standards.

Table 2 FPIC requirements

Requirement*	Section of this plan
<p>G5.2 Demonstrate with documented consultations and agreements that:</p> <p>a) The project will not encroach uninvited on private property, community property [62], or government property,</p> <p>b) The free, prior and informed consent [63] has been obtained of those whose property rights are affected by the project through a transparent, agreed process.</p> <p>Free, Prior and Informed Consent [64] is defined as:</p> <p>Free means no coercion, intimidation, manipulation, threat and bribery;</p> <p>Prior means sufficiently in advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes;</p>	<p>Section 5.</p>

<p>Informed means that information is provided that covers (at least) the following aspects</p> <ul style="list-style-type: none"> i) The nature, size, pace, reversibility and scope of any proposed project or activity; ii) The reason/s or purpose of the project and/or activity; iii) The duration of the above; iv) The locality of areas that will be affected; v) A preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle; vi) Personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees and others); and vii) Procedures that the project may entail; and <p>Consent means that there is the option of withholding consent and that the parties have reasonably understood it.</p> <p>Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined.</p> <p>c) Appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project [65].</p>	
<p>Community Costs, Risks and Benefits: G3.2 Explain how relevant and adequate information about potential costs, risks and benefits to communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.</p>	<p>Table 6; impact assessment.</p>
<p>Benefits, Costs, and Risks Communication: GL2.7 Explain how relevant and adequate information about predicted and actual benefits, costs and risks has been communicated to smallholders/community members and provide evidence that the information is understood.</p>	<p>Table 6; impact assessment.</p>
<p>2.6.1 Projects must follow an FPIC process that enables Indigenous Peoples and local communities with statutory or customary rights to land or resources in the project area(s) to negotiate the conditions under which the project is designed, implemented, monitored and evaluated.</p> <p>2.6.2 The FPIC process must meet or exceed the requirements of national legislation and legal obligations under international standards safeguarding Indigenous Peoples' rights.</p> <p>2.6.3 The FPIC process must follow a decision-making process and timeline defined by the rights holders, who must be able to participate through their own freely chosen representatives, while ensuring the involvement of women and Marginalised, Vulnerable and/or Disadvantaged People.</p> <p>2.6.4 The FPIC process must enable a collective decision by the rights holders to grant or withhold consent at key stages of project development and implementation that include, as a minimum whether to: i) Consider the proposed Project; ii) Engage in the Project design process; and iii) Implement the Project.</p>	<p>Section 5</p>

2.6.5 Consent must be sought before the Project or activity takes place and be re- confirmed periodically.

2.6.6 Consent must be independently decided upon based on accurate, timely and sufficient information provided in a culturally appropriate way, including full details of risks, responsibilities, and potential negative impacts of the Project.

2.6.7 All rights holders must be able to raise issues relating to consent at any time throughout the Project Period through the Grievance Mechanism (see Section 3.17).

4. Stakeholders in the LCA landscape

4.1 Stakeholders in carbon projects

Stakeholders in the carbon project development and implementation include:

- Rightsholders
- Other project affected people
- Regional and national authorities
- Project proponents/Project coordinators e.g. LCA
- Standards Setting Bodies e.g. Verra, Plan Vivo
- Independent Auditors i.e. VVBs
- Carbon credit buyers.

The majority of the conservancies within the LCA area are Private Conservancies with freehold or leasehold, while eight are community conservancies. In the community conservancies, pastoralism is the main livelihood activity, although many Maasai communities are transitioning from pastoral to agro-pastoral activities. Meanwhile, in the northern area of LCA, there are neighbouring Samburu communities, for example from Isiolo and Samburu counties, who are mobile, and periodically move into LCA conservancies for grazing.

4.1 Community heterogeneity

Within the pastoralist communities within LCA area, Ng'ang'a and Crane (2020), highlight that age, wealth and gender are key social axes which determine the types of adaptation strategies (including livelihood strategies) that community members pursue. Within Maasai communities, ownership of livestock is a key indicator of wealth, although this can now translate into a shift to agro-pastoral livelihood strategies (though being able to afford and negotiate land purchases), and other off-farm enterprises (which might be less exposed to climate change). Wealthier families can seek economic growth, and poorer families seek food survival strategies, and Ng'ang'a and Crane (2020) note that wealthier Maasai families are potentially more able to adapt to restrictions in access (economic displacement). Furthermore, there has been a shift, partly due to gradual losses in livestock among some, which is also climate-related, towards smaller livestock (goats and sheep), and camels, the latter of which are more drought resilient. The shift towards wildlife conservancies, seen in the last 20-30 years, is also partly linked to the higher resilience of wildlife to climate change compared to cattle.

Age also plays an important role, for example when considering rotational grazing systems, with young men's cultural rites ceremonies not easily aligning with the idea of bunching of herds. Ng'ang'a and Crane (2020) identified differing willingness between young men, middle-aged men, and older men in terms of their adoption of climate adapted interventions (holistic management, fodder production, etc).

Finally, Ng'ang'a and Crane (2020) also indicate how gender intersects with interventions such as fodder production, with some women standing to benefit despite the male-dominated nature of decision making outside of the household. Muok et al (2021) also indicate how hard it was for their

team to directly engage with women around Mukogodo forest, and reiterated the fact that women are largely marginal to forest governance decision making and political processes within Laikipia, requiring additional efforts and suitable approaches to ensure proper engagement.

These studies provide an insight into the social axes within communities, which will require stakeholder engagement to go beyond simple categories of ‘community’ ‘rightsholders’. ‘non rights holders (other affected people)’, to work with sub-groups within the communities when designing project interventions. While this deeper engagement work is not necessarily mandated by the carbon standards (although a focus on women is emphasised in the ‘exceptional criterion in CCB), it is crucial to the effective design of project interventions. The exact nature of these sub-groups, within a given conservancy, is likely to vary, although age gender, ethnicity, and wealth, are all likely to be important. As such, design of engagement methods should carefully consider disaggregation of some activities to account for these differences, and bring back findings to the broader group to seek solutions that can work for all groups. The potential to generate conflict within communities, and between ethnic groups which has in the recent past turned violent, is high, particularly with interventions that seek to reinforce or introduce access and control to land and pastoral resources (Mouk et al. 2021).

4.2 Community and customary rights

An essential idea within the CCB Standard is that there are ‘property rights holders’ which are entitled to (if affected by the project) Free Prior and Informed Consent⁷. The determination of ‘property rights holder’ is based on both statutory rights, and customary rights. This key concept requires careful consideration in a landscape such as Laikipia, where the community stakeholder context is complex. Adequate time will be required to understand this in each conservancy area, prior to making determinations as to the status of a particular stakeholder⁸, particularly where all rightsholders are not necessarily resident.

Within Laikipia, there is an important history of resettlement (by private white farmers, but also government). To counterbalance this, the government of Kenya brought in policies such as the as the Group Ranches and more recently the Community Lands Act (2016), to enable pastoralists to manage their land and pasture themselves. This occurs against the backdrop of increasing commercialisation, and privatisation of land, leading to reduced mobility for pastoralists within and across the landscape (Muok et a. 2011). While there is a shift for some pastoralists towards agro-pastoralism, and even off-farm enterprises, some livelihood systems of some groups, such as the Samburu, remains predominantly focused on pastoralism.

With this history, communities in Laikipia have experienced a substantial change in the land management regime in Laikipia, and this change continues. The introduction of environmental conservation and wildlife management, and the increasing formalisation of land tenure and management, also infers statutory rights to some groups, potentially to the exclusion of others. The Community Land Act (2016) defines communities as “a consciously distinct and organized group of

⁷ Note that the Standard also identifies ‘other stakeholders’, who are not defined as ‘communities’ or ‘rightsholders’ per se, but are still entitled to mitigation measures that prevent a ‘net negative impact’ on these groups.

⁸ Methods to determine the rights of different groups should be determined. Ethnographic studies, such as the mixed methods used by Muok et al (2021), and Ng’ang’a and Crane (2020), are ideal, however time-consuming. These methods include semi-structured interviews, focus group discussions, and observations. A methodology for understanding the stakeholders and rightsholders in each conservancy should be developed.

users of community land who are citizens of Kenya and share any of the following attributes: (a) common ancestry; (b) similar culture or unique mode of livelihood; (c) socio-economic or other similar common interest; (d) geographical space; (e) ecological space; or (f) ethnicity” (Republic of Kenya, 2016a: 528)”. Muok et al 2011 state that the “*issue of how to handle formal recognition of customary resource rights based in claims of indigeneity and belonging to an area has become highly contested in several forest areas in Kenya*”. The authors also identify that some groups, such as the Samburu, made use of traditional dry season grazing areas, and access routes to traverse land to these grazing areas, prior to the formalisation of conservancies.

In CCB terms, and in accordance with the World Bank Standards, these groups would be considered as customary rights holders, and therefore afforded FPIC. However, if viewed solely from a statutory rights perspective, it is possible that some Samburu groups are viewed as encroachers illegally impinging on conservancy land. In some cases, this will also be true, particularly as herders are driven by land degradation and climate change, among other factors. Unpicking these dynamics, which will likely vary across the conservancies, would be key to the engagement strategy, and form a strong foundation for FPIC. Fundamentally, even with increased efforts for protection and law enforcement, agreement among groups with a stake in the landscape will be important, and in other projects, such as the NRT project further north, this continues to be a key issue.

4.4 Stakeholders in LCA

In order to formulate a simple preliminary strategy, it is necessary to create some broad categories of community stakeholders, taking into consideration the above points about community heterogeneity and importance of checking and understanding customary rights. The following stakeholder categories have been defined:

1. Communities
 - a. Rights-holders
 - i. Indigenous Peoples
 - ii. Marginalised people
 - iii. Vulnerable/ disadvantaged people
 - iv. Specific natural-resource user groups
 - b. Other project affected people
 - i. Same sub-categories as i-iv
2. Local stakeholders
 - a. See Table 3.
3. Secondary stakeholders
 - a. See Table 3.

A more detailed list of stakeholders has been included in Annex 1, which is a tool for listing out stakeholders, conducting stakeholder analysis, and registering stakeholder engagements, and could be adapted to the purposes of the LCA project. Note that stakeholders can occupy more than one category in Table 3, for example Indigenous Peoples – natural resource user group – rightsholder. Note that within the community groups, there are sub-groups based on age, gender and wealth, as illustrated above. It could be that women are included as marginalised people, to be defined.

Table 3: Summary of broad stakeholder categories within the LCA landscape

Type of stakeholder	Description
Communities	
Rightsholders	Indigenous Peoples and Local Communities with statutory and/or customary rights to land and resources within the project area. Represented through formal leadership (eg. government chiefs), customary leadership (eg. age set leaders), and formal natural resource management committees for the Conservancy. Can include Indigenous Peoples, natural resource user groups, marginalised people, vulnerable people, as below.
	Individuals or Trusts with statutory and/or customary rights to land and resources in the project area (Private Conservancies with freehold or leasehold).
Other project affected people	Pastoral communities with no statutory and/or customary rights to land and resources within the project area, but who are resident and or use the project area (referred to sometimes as illegal settlers). Can include Indigenous Peoples, natural resource user groups, marginalised people, vulnerable people, as below.
	Pastoral communities who are in transit through the project area at particular times of the year or during periods of drought. Can include Indigenous Peoples, natural resource user groups, marginalised people, vulnerable people, as below.
Indigenous Peoples	Samburu, Yaaku, Masaai communities. These communities can in some cases be rightsholders, and in other cases 'other project affected people'.
Marginalised people	<i>See definitions, and to be identified and defined in case of LCA.</i> Can be rightsholders or other project affected people.
Vulnerable and/or disadvantaged people	<i>See definitions, and to be identified and defined in case of LCA.</i> Can be rightsholders or other project affected people
Natural resource user groups	Individuals who practice the same types of natural resource use. For example, fuelwood harvesters, pastoralists, charcoal producers. See Annex 1 for a fuller list.
Local stakeholders⁹	
Educational and religious institutions	Primary schools, Pastor fellowship, Yaaku cultural museum, and other local institutions
Local enterprises	Small-medium enterprises such as honey cooperatives, fish farms, local ecotourism outfits.
Diaspora	Conservancy members living outside the conservancy, but potentially affected by the project.
Secondary stakeholders	
Regional and national authorities	KWS, KFS, Ministry of Tourism, Police, as per Annex 1.

⁹ All groups other than communities who can potentially affect or be affected by the project activities and who may live within or outside the project zone.

County government	County government and related extension services (eg. veterinary services). Associated local government (Sub County>Location/Ward).
NGOs, Trusts and Research Institutions in the landscape	Northern Rangelands Trust, Impact, Osiligi, Grevy's Zebra Trusty, Ewaso Lions, Mpala research centre, as per Annex 1.
International NGOs and Agencies	UN FAO, USAID, as per Annex 1
Project proponent and coordinators	Laikipia Conservancies Association (LCA)
Standards Setting Bodies e.g. Verra, Plan Vivo	tbd
Independent Auditors i.e. VVBs	VVBs
Carbon credit buyers	tbd

5. Stakeholder engagement and FPIC

5.1 LCA engagement strategy

The engagement strategy for this LCA-led project will take into the account the different governance arrangements, tenure types, and stakeholders between the LCA conservancies. While one main difference is between community conservancies and the ‘private’ conservancies, each conservancy will have some unique stakeholders and dynamics that need to be accounted for. However, considering that a many broader stakeholder groups are the same across the landscape, this strategy aims to be adaptable to all of the conservancies, to ensure the same scope and principles are applied to engagement and FPIC. Specifically, this strategy includes:

- One broad Stakeholder Engagement Plan to be developed and used by the project proponent (LCA), outlining:
 - Scope of stakeholder engagement and FPIC
 - Objectives
 - Procedures
- Stakeholder identification and analysis to be conducted on a conservancy level for each new conservancy that is considered for inclusion in the project.
- Conservancy-specific stakeholder engagement (including FPIC) plan to be formulated in conjunction with the entity responsible for the management of the conservancy. This plan will include clear roles for LCA and the managing entity.
- During the project design phase, LCA will conduct engagement activities that extend beyond conservancy-level engagement events (eg. with the Conservancy management committees), in close coordination and collaboration with the management entity, in order to ensure meaningful consultation, and where relevant, FPIC, of rightsholders, including marginalised groups, vulnerable groups, and indigenous peoples, who stand to be affected by the project.
 - This will include adequate disaggregation along the axes of age, gender, wealth and ethnicity, particularly when identifying customary rights, designing project interventions, and reaching consent.
- Stakeholder engagement and FPIC are so closely inter-twined with other project design activities, such as land rights and land use mapping, and social impact assessment, that LCA will develop an overview of the proposed project design process to illustrate the flow of work and how results from particular activities feed into each other. Mapping out the overall project design process will be useful for LCA, and a clear procedure to be conducted at each conservancy (even if there is a degree of iteration in practice), will be important for management entities and LCA community engagement staff.
- A summary of this is provided in Section 5.2, but this would be to be developed further.

5.2 Level of engagement and possible methods

The following levels of engagement have been applied to the broad stakeholder categories:

1. **Inform : Informed of the project:** sharing of relevant project information.
2. **Consult: Consultation in project design:** providing information and requesting feedback during the project design process.

3. **Collaborate: Collaboration in project design and development and monitoring of mitigation measures:** the minimum expectation for working with other project affected people (not rightsholders) to ensure that there are no negative impacts on these groups
4. **Consent: Free, Prior and Informed Consent.**

In some cases, permissions could be required, or other forms of engagement will be relevant.

The level of engagement (4 being the highest level) will include all the lower levels of engagement as well. For example, consultation in project design would also include sharing relevant information on the project.

Table 4: Level of stakeholder engagement and potential methods

Type of stakeholder	Type of engagement
Communities	
Rightsholders	<p>FPIC; collaboration in project design and implementation.</p> <p>Likely representatives include the Conservancy Management Committees and Customary leaders. An FPIC protocol is to be developed with these groups.</p> <p>FPIC; collaboration in project design and implementation.</p> <p>Private owners or Trust Board</p>
Other project affected people	<p>TBD; participation in development and monitoring of mitigation measures.</p> <p>TBD; participation in development and monitoring of mitigation measures.</p>
Indigenous Peoples	<p>Rightsholders: FPIC; collaboration in project design and implementation.</p> <p>No customary/ statutory rights (); TBD; participation in development and monitoring of mitigation measures.</p>
Marginalised people	<p>Rightsholders: FPIC; collaboration in project design and implementation.</p> <p>No customary/ statutory rights; TBD; participation in development and monitoring of mitigation measures.</p>
Vulnerable and/or disadvantaged people	<p>Rightsholders: FPIC; collaboration in project design and implementation.</p> <p>No customary/ statutory rights; TBD; participation in development and monitoring of mitigation measures.</p>
Natural resource user groups	<p>Rightsholders: FPIC; collaboration in project design and implementation.</p> <p>No customary/ statutory rights; TBD; participation in development and monitoring of mitigation measures.</p>
Local stakeholders¹⁰	
Educational and religious institutions	Consultation in project design
Local enterprises	Consultation in project design

¹⁰ All groups other than communities who can potentially affect or be affected by the project activities and who may live within or outside the project zone.

Diaspora	Consultation in project design
Secondary stakeholders	
Regional and national authorities	Informed of the project; permissions
County government	Consultation in project design
NGOs, Trusts and Research Institutions in the landscape	Likely to be defined on an organisation by organisation basis. Some would be informed of the project if not likely to be linked to the project design and implementation, others consulted with.
International NGOs and Agencies	Informed of the project
Project proponent and coordinators	Laikipia Conservancies Association (LCA): project developer.
Standards Setting Bodies e.g. Verra, Plan Vivo	tbd
Independent Auditors i.e. VVBs	VVBs, tbd.
Carbon credit buyers	tbd

In the next iteration of this plan, specific engagement methods can be included. This should be based on existing engagement forums and mechanisms, and improving these where there are gaps. There is likely a need for multi-stakeholder forum type events, to bring different stakeholders together.

For those stakeholders who will be informed of the project, this will involve sharing of an Information Disclosure Sheet, and for communities and rightsholders, use of the Carbon Primer. For rightsholders, there would likely be:

- Community meetings
- Key informant interviews
- Group discussions for in-depth discussions, such as with the Conservancy Committees and customary authorities, natural resource user groups.

The level of engagement should be planned according to the key project design and development activities. Illustrated in Table 6. For some activities, a broad information sharing community meeting might be suitable, whereas for others, a more disaggregated approach is needed.

5.4 Engagement process

The project design phases for a carbon project are shown in Table 5. A breakdown of these Phases is illustrated in Table 6. Importantly, three key FPIC decision points have been included in Table 5 and 6. These could be planned out once the scope of FPIC is clarified, and once LCA has completed an internal capacity assessment for FPIC and associated training and staffing.

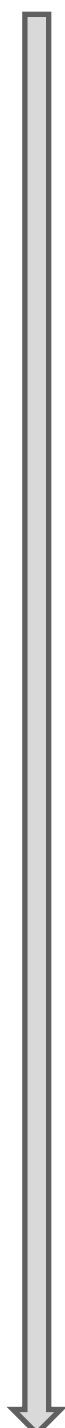
The definition of this FPIC process should also benefit from the pre-cursory consultations indicated in Table 6, to generate an understanding of community-decision-making processes, and how to align this with the principles of FPIC (including involvement of women, and youth, in the consent process, for example). The key decision points are likely to include:

1. Consent to be involved in the project design (decision point 1): this is consent to work with LCA on the design of a carbon project, with no commitment to the project per se. This is based on the information shared (in the carbon primer). This decision can be made by legitimate representatives of the community (eg. customary leaders and conservancy management committees), but should have included broader information sharing.
2. Consent to continue with the management planning (decision point 2): this is consent to continue with the project design and conduct management planning (to formulate the agreement with the project), and should be based on complete understanding of the potential project design (theory of change), and the E&S assessment (potential risks and impacts).
3. Consent to the project agreements (decision point 3): this includes agreement to the land/resource management plan and activities, benefit-sharing (including any mitigation measures, such as the livelihoods restoration plan or equivalent). Within agreements there would be clauses to allow both parties to make adjustments, in order to uphold the principle that consent can be withdrawn (usually if the conditions change, or there terms are not met).

There would be on-going FPIC activities during the project implementation, to generate feedback and to assess the quality of FPIC, and third-party verification of FPIC could be considered.

Table 5: Project design phases for carbon projects

Design phase	Description	Output
Pre-feasibility	Initial assessment of the potential project to identify barriers to legal compliance and eligibility for certification; quantify potential carbon benefits, transaction costs and implementation costs and determine the scale of and timeframe needed to break even.	Pre-Feasibility Report that determines whether there is potential for a viable project.
Concept development	LCA works with rights-holders and other project affected people to identify land management activities with potential to generate carbon credits, and determine if there is potential for a carbon project. The rights-holders then decide if they wish to continue to the project design phase (Consent point 1).	Concept Note or Project Idea Note.
Project design: preparation	LCA works with rights-holders and other project affected people to design land management plans, project governance structures, and systems for measuring project benefits, that meet the requirements of a Standards Setting Body that issues carbon credits. The project design is described in a document that must be approved by rights-holders and relevant authorities, before project activities start (Consent point 2 & 3).	Project description (PD)
Project design: planning		
Project design: inception		
Implementation and M&E	<p>Validation – The project design document is reviewed by Standards Setting Body and an independent auditor who will visit the Conservancy, to determine if it meets the requirements for generating carbon credits.</p> <p>Project implementation and monitoring – LCA and the rights-holders implement the land management plans and carry out monitoring activities to measure changes to vegetation and soils to describe project benefits:</p> <p>Verification – Monitoring reports are reviewed by the Standards Setting Body and an independent auditor, who will visit the Conservancy, to determine if the project benefits have been achieved, if their findings match the monitoring report the project will receive carbon credits that can be sold:</p> <p>Credit sales – LCA will help to identify carbon credit buyers, manage credit sales, and ensure that the proceeds are distributed in the way agreed in the project design</p>	Periodic verification reports



The types of community and stakeholder-facing activities that would occur on a Conservancy level, are indicated in Table 6. Further detail of what these activities involve can be provided in the next iteration of this plan.

Table 6: Project design phases and activities on a community/ conservancy level

Key social component	Pre-feasibility	Concept development	Project design – preparation	Project design – planning	Project design – inception	Implementation & M&E
Stakeholder engagement						
Stakeholder engagement	Desk-based review	Stakeholder identification & analysis; draft SEP; initial consultations and information sharing.	Final stakeholder engagement plan	Implementation of SEP	Implementation of SEP	Implementation of SEP
FPIC	Desk-based review	Project proponent capacity assessment & training Pre-cursory consultations on FPIC Draft FPIC protocol Consent point 1: agreement to participate in the project	FPIC training to communities/other stakeholders Final validated FPIC protocol	Implementation of FPIC Consent point 2: agreement to continue with management planning	Implementation of FPIC Consent point 3: full agreements	Implementation of FPIC
GRM	Desk-based review	Pre-cursory consultations on FPIC	Develop GRM mechanism and register Establish GRM	Implementation of GRM	Implementation of GRM	Implementation of GRM
Situational analysis						
Legal analysis	Legislation review including stakeholder rights (use, access, management)					
Participatory mapping	Collation of existing map outputs	Scoping of high conservation values and workplan for participatory mapping & HCV assessment	Participatory land rights, land use, and HCV mapping	HCV management and monitoring plan	Implementation of the HCV management and monitoring plan	
Socioeconomic assessment	Collation of information sources	Livelihoods and socioeconomic assessment; establish indicators for monitoring	Livelihoods and socioeconomic survey; collection of baseline		Socioeconomic monitoring plan integrated into project monitoring plan	M&E
Project activity planning						

Participatory planning, baseline and additionality assessment		Theory of change development Baseline Scenario Assessment: problem tree analysis, participatory threat assessment, solution tree analysis.		Project activity plan & monitoring plan		
Environmental and Social Risk Management						
ESIA	Desk-based review	Rapid E&S screening (red flags/ exclusions)	E&S screening ToR for ESIA/SIA/E&S assessment	E&S assessment Preliminary ESMP	Final ESMP and any associated safeguard plans ESMP implementation	ESMP implementation
Livelihood restoration plan						
	Desk-based review	Establish the livelihood restoration framework or equivalent		Preliminary site-level livelihood restoration plans	Interim site-level livelihood restoration plans	Final site-level livelihood restoration plans.

6. Grievance redress mechanism

The CCB and Plan Vivo grievance redress mechanism requirements are shown in Table 7.

Table 7: Grievance redress mechanism requirements

G3.8 Document the project's grievance redress procedure. Demonstrate that the procedure includes: <ul style="list-style-type: none"> • A process for receiving, hearing, responding to and attempting to resolve grievances within a reasonable time period, which takes into account traditional conflict resolution methods. • Three stages, each with reasonable time limits: attempt at resolution, mediation and arbitration or courts. 	CCBV3.1	Section 6
G3.8 Describe how the feedback and grievance redress procedure is publicized and accessible, and how grievances and project responses are documented and made publicly available.	CCBV3.1	Section 6
3.17.1 Projects must have an accessible and culturally appropriate Grievance Mechanism for reporting and remediating social, environmental and cultural incidents that result (directly or indirectly) from Project activities; and that can address situations where there is non-conformance with the conditions of the Project as stated in the Project Agreement.	PVV5.0	Section 6
3.17.2 All issues raised through the Grievance Mechanism must be documented and resolved in a transparent, fair, and timely manner.	PVV5.0	Section 6
3.17.3 Where possible, grievances should be reconciled by the affected parties; in case this is not possible, however, the Grievance Mechanism must identify an independent arbitrator that will be responsible for mediating resolution of any grievances that cannot otherwise be resolved.	PVV5.0	Section 6
3.17.4 The Grievance Mechanism must be described in each Project Agreement.	PVV5.0	Section 6

The LCA project will establish a Grievance Redress Mechanism (GRM) that responds to the requirements indicated in Table 1 and ensures that the project can receive and manage grievances related to the project from communities and other affected persons.

The GRM design process will include the steps below. In the meantime, prior to these steps being completed, an interim grievance and feedback mechanism should be put in place by LCA, to ensure stakeholders can provide timely feedback regarding the project design, which has effectively already started.

1. Desk-based review and drafting of a provisional grievance mechanism. This review will include a review of any existing grievance mechanisms in the landscape, including those of partner organisations, and developing an understanding any existing grievances that might interface with the project.
2. Pre-cursory consultations with communities and local stakeholders to understand:
 - a. existing conflict resolution and grievance management procedures in operation
 - b. preferred ways of lodging a grievance, including mechanisms¹¹, language considerations, etc.
3. Establishment of the grievance mechanism, including:
 - a. finalising the procedures and establishing the grievance register;
 - b. clarifying responsibilities and conducting internal training;
 - c. communicating the mechanism to stakeholders through appropriate communication channels.
4. Implementation of the grievance mechanism, including integration into project meetings and events, and documenting and responding to grievances.

Note that in addition to affected persons, project workers¹² should also have access to a Grievance Mechanism. In some cases, organisations have a separate grievance procedure for project workers, including sub-contractors.

¹¹ For example a) Grievance boxes; b) Reporting to an extension worker/project staff member; c) Having a community member (local level contact person) who will gather and present grievances; d) Presenting them in project meetings; e) Presenting them to the customary authorities

¹² Project workers in the context of the LCA project will need to be defined, but can include direct staff of LCA, sub-contracted parties, and voluntary community positions.

7. Expertise and resources

The LCA will review this draft stakeholder engagement plan and proposed FPIC process, the required skills and expertise, and then conduct a capacity assessment. This assessment will determine the staffing of the engagement and FPIC activities, including any training required.