

Annex A – Ancillary Facilities Resettlement Policy Framework

1 Introduction

Electricidade de Moçambique, E.P. (EDM) is planning the implementation of the Mozambican Integrated Transmission Backbone System – the STE Project. The STE Project is a major power transmission Project linking the Provinces of Tete and Maputo, through extra high voltage transmission lines. The goals of this Project are to connect and integrate the current two isolated power systems in Mozambique and to allow the evacuation to the southern region of surplus power generated in the north. Due to its scale and complexity, EDM plans to develop the STE Project in phases. Currently, EDM is proposing the implementation of Phase 1 of the STE Project: Vilanculos – Maputo, which includes a 561 km long 400 kV line connecting these two cities, the construction of three new substations (in Vilanculos, Chibuto and Matalane) and the upgrade of the Maputo substation (in Boane).

The implementation of the STE Project will lead to resettlement impacts, namely due to the establishment of its right-of-way, which in Mozambique is established as a Partial Protected Zone. The Partial Protected Zone (PPZ) in the Mozambican context is somewhat particular and different to that of most countries, given the nature of the Mozambican land law (detailed further in regulatory framework below). In Mozambique, land is not private and remains the property of the State and cannot be bought, sold or otherwise alienated, mortgaged or encumbered. The spirit of the law is based on the principle of guaranteeing access and use of land to the population as well as for investors. As such it guarantees land use rights but also enables the revocation of such rights, should they be in the public interest.. With regards to power lines, the Land Law 19/97 of 1st of October, states that the partial protected zone includes a corridor of 50 m on either side of the line (100 m width total).

The location of the PPZ has been identified by EDM and a Resettlement Plan has been prepared for it. However, the location of sites where the auxiliary structures (access road, works camp, borrow pits, disposal sites, staging areas, etc.) will be placed have not yet been identified. The purpose of this policy framework is to clarify resettlement principles, organizational arrangements and design criteria to be applied for the construction of these ancillary structures during the project implementation.

2 Project Description

The implementation of the STE Project Phase 1 will require a number of complementary components and activities, which are required to support the Project's construction and operation. These ancillary infrastructure and facilities include:

- Construction of access roads, for line and substation construction and maintenance purposes;
- Exploration of borrow pits to provide aggregates and inert materials for construction purposes;
- Establishment of construction camps, including temporary workers' accommodation and temporary storage sites for equipment and materials.

The location of these ancillary infrastructure is not defined presently. As such, it was not possible to assess their potential resettlement impacts and to include them in the scope of the Project's RAP. It is expected that the location and design of this infrastructure will be defined by the construction Contractors, under EDM supervision.

Depending on the location and design of these ancillary infrastructure and facilities, they might generate additional resettlement impacts. As such, specific assessments and resettlement and compensation plans might need to be developed in the future for these ancillary infrastructure and facilities, once their location is known. Such specific assessments and resettlement and compensation plans will be developed in full accordance with the principles, directives and methodologies established in this RPF.

2.1 Phasing of the STE Project

The STE Project will be phased and sequenced into 3 Lots, as noted below. All necessary required ancillary structures will follow in accordance with this sequencing, and as such ancillary structures required for the implementation of the STE will commence with those necessary for Lot 1 and this will then be followed by those required for Lot 2 and finally Lot 3.

Lot 1 – All substations. Three new substations - Vilanculos, Chibuto and Matalane

Lot 2 – 400 kV OHL Temane - Vilanculos SS

Lot 3 – 400 kV OHL Chibuto SS - Matalane SS - Maputo SS

3 Principles and Objectives

Based on the nature of the proposed Project, it is very likely that the construction of the ancillary structures will lead to either acquisition, restriction to and/or loss of access to land, economic assets and/or resources. Therefore prior to their construction, a site-specific Resettlement Action Plan (RAP) will need to be prepared for these ancillary facilities.

This RPF along with the ESMF provides the basis for screening the ancillary facilities to ensure that any adverse impacts on communities, groups, individuals and/or assets in the project area are duly identified and mitigated.

The objective of a RPF is to establish the resettlement and compensation principles and criteria methodology, and organizational arrangements to be applied, during the resettlement process, in order to ensure that the resettlement adheres to and meets both the World Bank (WB) standards and the Mozambican regulatory framework.

The RPF also establishes the mechanisms by which the appropriate tools, screening checklists and the RAP will be implemented in order to mitigate potential negative impacts of any resettlement caused by ancillary facilities.

Each RAP will need to be prepared to the standards of the Mozambique Government's Decree 31/2012, of 8 August, and Ministerial Diploma 156/2014, of 19 September, and the World Bank's Operational Policy (OP) 4.12.

Prior to the full authorization of the ancillary structures, a fully detailed resettlement and compensation action plan (RAP) shall be developed. Subsequent to the sanctioning by the Client, the RAP shall be submitted to the Mozambican Government for approval (and the World Bank for non-objection). The RAP (except any measures designed for the post resettlement period) must be fully implemented before any land acquisition, compensation, resettlement, and/or any other impact on livelihoods occur.

4 Resettlement Process

This process will follow the following broad steps, which are further detailed in the following sections:

- **Step 1: Definition of location and design** – the Construction Contractors will define the location and characteristics of the ancillary infrastructure and facilities, in compliance with the guidance provided in this RPF, and submit them for EDM approval and WB no-objection. This will be done prior to final approval of the ancillary facilities
- **Step 2: Resettlement screening** – the Construction Contractor will screen the proposed facilities against national Resettlement decree and WB OP 4.12 criteria to determine the level of the resettlement and licensing required, if any. This screening will be submitted to EDM approval and WB no-objection, simultaneously with the location and characteristics of the ancillary infrastructure and facilities. If the screening triggers the national resettlement decree, the national process for environmental licensing and resettlement should then be followed, as per step 3 and this RPF activated to guide the preparation of the RAP in accordance with OP4.12;
- **Step 3: Resettlement Plan and licensing** – the Construction Contractor will develop the resettlement documentation that may be required, depending on the outcomes of the screening. This may take the form of a Resettlement Action Plan (RAP) or Abbreviated RAP. All Resettlement Plans will be assessed and adequate mitigation will be defined, in compliance with national Resettlement Decree and WB OP 4.12. Public disclosure and consultation will be required, according to the level of assessment. All such documentation will be submitted for approval by MITADER (if required) and EDM and for WB no-objection;
- **Step 4: Monitoring and evaluation** - EDM will monitor and evaluate the Construction Contractors' Resettlement performance and the compliance with the requirements defined in step 3. All resettlement must be completed and compensation paid before the ancillary facility can be installed and used.

5 Estimated Population Displacement

As the ancillary structures sites have not yet been defined it is not possible to estimate the number of households that will be directly impacted by it. However some mitigation measures will be followed in order to minimize the resettlement impact. These mitigation measures are:

- Select sites within the Surveyed Area – selecting a Site within the PPZ or substation area will mean that the affected Household have already been surveyed causing no additional households to be impacted.
- Use existing licensed borrow pits and disposal sites –to avoid relocation of households.
- Selects sites which are currently not occupied with any infra-structures or farms – Selecting sites which are currently not occupied will reduce the number of affected household. This can be done by engaging with District government and local leaderships.

6 Eligibility Criteria

The construction of the ancillary infrastructures might cause the physical and economic displacement of people currently living and/or with assets or economic activities within the proposed facility . The direct socioeconomic impacts of such displacement may result in:

- Loss of houses and associated land;
- Loss of auxiliary structures;
- Loss of infra-structures under construction and associated land;
- Loss of agricultural land;
- Loss of crops, if land acquisition occurs before the harvest season or crop cycle is interrupted by the Project;
- Loss of trees with economic value;
- Loss of cemeteries, holy and sacred sites;
- Loss of business activities and profits;
- Loss of Land Use Rights (DUAT);
- Loss of access to services or connectivity
- Loss of public and social infrastructures/services.

In accordance with the OP 4.12 and national legislation, PAP's entitled to compensation and livelihood restoration provisions are:

- Persons and/or groups – including communities – with legal rights to land, whether formally registered and delimited or not , and who stand to lose land, either temporarily or permanently;
- Persons and/or groups, with no legal land use title or legally recognisable land use rights who stand to lose land – either permanently or temporarily – that they currently occupy or use (as of the cut-off date when one is established).
- Owners of buildings/structures attached to land which may be lost.
- Owners of annual, seasonal and/or perennial crops and/or trees and other herbs or natural resources of value.
- All persons suffering economic loss as a result of land acquisition or land use change or restriction resulting from the project.
- Tenants and workers.

Compensation eligibility is established or set in accordance with the above and the cut-off date to be set by EDM in accordance with OP 4.12. It is important to note that the primary means by which individuals', HH's and/or communities' land rights and occupancy are verified, according to local legislation, is through recognition by the local leader / traditional authority / community leader (or their representatives) or the possession of a formally registered land use title. The WB's safeguards include those with no legally recognisable rights within their provisions and, therefore, presence or possession at of the cut of date has also been included within the eligibility profile. This type of eligibility, whilst extremely uncommon in Mozambique, will be confirmed by declarations from neighbours or any other evidence, should the need arise. In addition, Resettlement Committees can undertake an eligibility evaluation process in cases where eligibility is challenged. If not resolved, these cases will be referred to the Project GRM.

Table 6-1 – Eligibility Criteria entitlement Matrix

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
Permanent loss of land use rights (total or partial)	Agricultural (including fallow land), residential and commercial land as well as land utilised for community/groups and/or village purposes/activities which said community/group/village has a legal claim to.	Individuals, HH's, communities and/or groups with legally recognisable rights to land. (With or without formally registered DUAT's as recognised by the land law).	<p>Land will be replaced in-kind. Such land will be within the same locality/community and assessed¹ to be suitable and of equal or higher value to that being replaced.</p> <p>Where suitable replacement land within the same locality cannot be identified (or land deemed unsuitable), PAP's who are not vulnerable or who are losing only small fraction of their land (10% or less) may be offered the option of partial or full cash compensation at replacement value and/or alternative land. This will be managed on a case by case basis and include a vulnerability assessment to ensure PAP's short to medium term prospects are not negatively affected. Vulnerable HH will not be eligible for exclusive cash compensation</p> <p>All relocated PAP's will be provided with assistance in registering replacement land and all costs related to formalising the DUAT's will be provided</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	EDM/District Authorities

¹ Assessment is subjective and therefore will include participation of individuals/HH's and communities being resettled. Such assessment will also include, amongst other aspects, the lands agricultural potential and proximity and access to social, economic and cultural infrastructure such as transportation networks, schools, health posts, markets and community recreation areas etc.

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
		Individuals and HH's who have no legally recognisable rights who occupy and derive their livelihoods from land within the PPZ prior to the cut-off date, including tenants.	<p>Land will be replaced in-kind. Such land will be within the same locality/community and assessed² to be suitable and of equal or higher value to that being replaced.</p> <p>Where suitable replacement land within the same locality cannot be identified (or land deemed unsuitable), PAP's who are not vulnerable or who are losing only small fraction of their land (10% or less) may be offered the option of partial or full cash compensation at replacement value and/or alternative land. This will be managed on a case by case basis and include a vulnerability assessment to ensure PAP's short to medium term prospects are not negatively affected. Vulnerable HH will not be eligible for exclusive cash compensation</p> <p>All relocated PAP's will be provided with assistance in registering replacement land and all costs related to formalising the DUAT's will be provided</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	EDM/District Authorities
Temporary loss of land use rights (total or partial)	Agricultural (including fallow land), residential and commercial land as well as land utilised for community/group and/or village purposes/activities which said community/group/village has a legal claim to.	Individuals, HH's, communities and/or groups with legally recognisable rights to land. (With or without formally registered DUAT's as recognised by the land law).	<p>For land outside the PPZ needed only during construction, PAP's will be compensated monetarily for temporary loss income/livelihoods. Such compensation will include all losses of expected income/produce as well as disturbance compensation.</p> <p>For land within PPZ that will be returned to current users with restriction, PAPs may opt for replacement land or may stay on current plot under legally binding use agreement between themselves and EDM. Such legally binding agreements shall make provision and commitments to resettle and compensate PAP's, should use be further restricted and/or EDM or other agency require the land. License for agreed uses will be obtained by EDM in favour of the PAP.</p>	EDM

² Assessment is subjective and therefore will include participation of individuals/HH's and communities being resettled. Such assessment will also include, amongst other aspects, the lands agricultural potential and proximity and access to social, economic and cultural infrastructure such as transportation networks, schools, health posts, markets and community recreation areas etc.

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
			PAPs will be entitled to targeted livelihood restoration measures (see below)	
		Individuals and HH's who have no legally recognisable rights who occupy and derive their livelihoods from land within the PPZ prior to the cut-off date, including tenants.	<p>PAP's will be compensated monetarily for temporary loss income/livelihoods. Such compensation will include all losses of expected income/produce as well as disturbance compensation</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	EDM
Total or partial loss of structure	Residential, HH auxiliary support structures and commercial infrastructure (including <i>machamba</i> support structures).	Owners of structures (regardless of land tenure status) (Individuals, HH's groups and/or communities).	<p>Total or partial loss of residential structure will be replaced as whole structures in accordance with national legislation. Where possible this will be done on the PAP's current land parcel or within the PAP's locality or community. Where not feasible, PAP's will be offered a choice between replacement homes in preidentified land parcels in the same locality or monetary compensation for the full replacement value of the structure plus transaction costs. Both such options will take into consideration the PAP's vulnerability and short to medium term prospects of re-establishing their present livelihood standards. Vulnerable PAPs will not be eligible for exclusive cash compensation.</p> <p>All auxiliary HH support structures will be replaced as whole structures.</p> <p>Infrastructure under construction will be compensated for monetarily unless intended use of infrastructure is HH primary habitation, in which case compensation will be ins</p>	EDM

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
			<p>accordance with provisions on partial or total loss of primary residence as indicated above.</p> <p>Business structures will be compensated for in-kind and with conventional building materials and ensure equal or improved structure. Where in-kind compensation is considered inappropriate or unacceptable to PAP, as a result of changes in conditions such as location etc, compensation will be made monetarily at full replacement value plus transaction costs. An assessment of the PAP's vulnerability and potential ability to restore standards of living will be made prior to the cash compensation option. Vulnerable PAPs will not be eligible for exclusive cash compensation.</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	
	Public and community infrastructure.	Public/community	Public, social and community infrastructure will be replaced in kind in areas determined by community, local government and local leaders.	EDM/District Authorities
Loss of annual and perennial crops and trees	Standing crops and trees	Owners	<p>Unless annual crops can be harvested prior to construction, all annual crops will be compensated for monetarily in accordance with the ministry of agriculture's price information table for crops or the validated current market value (FRC) whichever is higher.</p> <p>Perennial crops and trees of economic value will be compensated for monetarily in accordance with the ministry of agriculture's price table or the validated current market value (FRC) whichever is higher.</p> <p>Compensation will be valued in accordance with the prime productivity (highest) valuation of the asset.</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	EDM

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
Temporary loss of income	Functioning business	Owners	<p>All businesses will receive transitional support monetary compensation for all loss of income during transitional phase</p> <p>PAPs will be entitled to targeted livelihood restoration measures (see below)</p>	EDM
		Employees	All employees of affected businesses will receive monetary compensation for all loss of income during the transitional phase.	EDM
Loss of sacred and heritage sites	Graves, places of worship, monuments and other historic sites of socio-cultural value.	Individuals, HH's, groups and communities	<p>The restoration of such assets will be guided by national legislation and all costs related to such activities will be furnished</p> <p>Exhumation and reburial arrangements will be made with district and village governments/authorities for larger concentrations of graves</p> <p>Land will be identified (through local authorities) for preparation of formal cemeteries. Exhumation, transport and reburial of individual graves will be covered</p> <p>Each village will organise a combined ceremonial process for the grave exhumation and reburial of all graves within the village in accordance with religious beliefs and/or customs</p> <p>When justified a small shrine or memorial structure dedicated to the ancestors of the people who were resident and had family graves in the project affected area will be erected</p> <p>Households or communities will organise a ceremonial process for the movement/transfer of the spiritual site to its new location in accordance with social norms</p> <p>All other artefacts will, if necessary be transferred to new sites in accordance with local norms.</p>	EDM

Type of Impact	Nature/Type of Asset	Eligible	Compensation Measures	Responsible Organisation/Agency
Loss or significant reduction in income or reduced possibilities in relation to guaranteeing or sustaining livelihoods (not included in the above impacts), due to loss and restrictions to land and/or other assets.	Numerous (such as access to specific forest and wood products – depending on area – medicinal herbs, bush meat and plants etc and access to social networks and public goods and specific infrastructure, such as social security etc).	<p>Individuals and HH needing livelihood support to address impacts not covered by compensation due to livelihood disruption</p> <p>All PAP's who make use of diversified and broad livelihoods strategies based on the natural resources available. Specifically vulnerable PAP's, however, who may require medicinal plants and/or social networks in order to sustain themselves and their HH</p>	<p>Targeted livelihood restoration measures for HH and individuals whose livelihoods are disrupted</p> <p>Targeted livelihood restoration measures with a specific focus on multiple and compounding vulnerabilities such as gender, disabilities, illness, the elderly and child headed households will be executed.</p>	Civil Society Organisation to be identified and contracted by EDM
Loss of access to land/housing/ resources	Various	Tenants	<p>Tenants will be compensated for all assets which they claim theirs, having, planted and/or invested in. This process will be managed in conjunction with the owners and community leaders in order to ensure fairness</p> <p>Tenants will be assisted in finding alternative rental sites and compensated for transitional losses</p> <p>Tenants will also receive targeted livelihood restoration assistance</p>	EDM

7 Legal Framework

The table below shows a gap analyses between the applicable Mozambican legislation and WB OP 4.12, as well as measures to bridge the gap.

Table 7.1 – Gap analysis between the applicable Mozambican Legislation and the OP 4.12 of the World Bank

TYPE OF ASSET	NATIONAL LEGISLATION	OP 4.12	MEASURES TO BRIDGE THE GAP
Land	According to the Land Law 19/97, Article 3: the land belongs to the state and cannot be sold, mortgaged and alienated in any form. Therefore, land is compensated for in kind. Replacement land must be at least equivalent to or better from a livelihoods perspective.	Displaced persons shall be offered choices among feasible resettlement options, including adequate replacement land or cash compensation. Compensation should be at full replacement cost. Compensation in kind is, however, recommended and land shall be at least equivalent to those previously enjoyed or consistent with prevailing minimum codes or standards, whichever is higher.	<p>In principle, land compensation will be in kind.</p> <ul style="list-style-type: none"> - where land is not available and HH's are required to move further afield, they will be given the option of full replacement value (calculated through a market survey and an estimation of cost of acquiring a DUAT to similar land in current location, including all transactional costs. This option will only be considered should HH not be deemed vulnerable - where usage of the PPZ is permitted for annual crop farming (only trees and structures are not allowed). Partial cash compensation as agreed with the PAP may be considered as 'replacement' for imposed restrictions on land use and limitations on DUAT. Such land use rights within the PPZ will be legalised through enforceable MoU or contract, securing land tenure, albeit restricted and providing rights to future compensation in case of additional restrictions. <p>Where receiving land as compensation, all related cost for acquiring new DUAT for replacement land will be covered.</p> <p>If PAPs are vulnerable, cash compensation can only be considered if land portion impacted is 10% or less and remainder is sufficient to support PAP's livelihood.</p> <p>The fact that all citizens are entitled and have the right to land (by law) must be taken into consideration with regards to limiting replacement land to in-kind³.</p>
	The Mozambican legislative environment requires that assistance be provided during the bridging phase. It is, however, not clear or specific.	Assistance to be provided for the restoration of productivity and achieving production levels (at least equivalent to that of land being replaced).	PAP's will be provided with disturbance and relocation support as well as tailored livelihood restoration programme.

³ Given that Mozambique's constitution and land laws emphasis positive rights – land is considered an inalienable right held by all Mozambicans.

TYPE OF ASSET	NATIONAL LEGISLATION	OP 4.12	MEASURES TO BRIDGE THE GAP
Buildings (houses, annexes and other affected built structures)	<p>According to Decree 31/2012 structures are compensated in kind. Minimum requirements for replacement houses include:</p> <ul style="list-style-type: none"> - Built with conventional materials; - 3 bedrooms; - 70 m²: and - Plot of 5000 m² for rural areas and 800 m² for urban areas. <p>There are no specifics provided for HH's with homes larger than 70m²</p>	Compensation in kind is recommended. Cash compensation should be at full replacement cost including all transaction costs (taxes, permits, fees, moving, etc.).	<p>Compensation in kind based on the present value/characteristics of the houses and structures with improvement to reach minimum standards of Decree 31/2012, including all transaction costs. EDM will provide physically displaced people a choice of options for adequate housing with security of tenure.</p> <p>Cash compensation for house and structure may be considered at full replacement cost should HH request it and as long as HH is not considered vulnerable.</p> <p>Houses under construction will be compensated for in cash, unless primary PAP residence which will then be compensated in accordance with the above.</p>
Crops	Crops and fruit trees shall be compensated for monetarily according to a compensation list published by the Provincial Department of Agriculture.	For perennial crops, compensation shall take into account the production delivery over the life of the trees/plants. For annual crops, the land offered as compensation must allow for the restoration of production and transitional losses accounted for. Lost crops and trees are compensated at full replacement cost	<p>HH's will be permitted to cultivate until it is time to relocate and compensated for all crops that cannot be collected and any missed cropping seasons.</p> <p>Compensation in cash will be based on values provided in the Provincial Department of Agriculture compensation table validated by a market price study. If the market price is higher it will be the basis of compensation to achieve full replacement cost. Transaction costs will also be covered.</p> <p>For perennial crops and trees, full replacement cost will be considered at peak productivity or maximum value within Provincial Department of Agriculture's compensation table.</p> <p>In kind compensation (fruit tree seedling/saplings) will form part of the livelihood's restoration programme.</p>
Economic Impact	Decree 31/2012 does not make provisions for economic impacts. However, given that the legislation makes clear that living standards and livelihoods should be equal or improved, it is customary to compensate for the loss of income or livelihood during the transitional period pending return to pre-resettlement conditions.	Disturbance and transitional losses will be compensated for in cash. In cases where land acquisition and/or restriction affects commercial enterprises, affected business owners will be compensated for the cost of identifying alternative locations, loss of net income during transitional period and all costs related to re-establishing business.	<p>Disturbance and transitional losses will be covered through cash compensation at full value for the entire duration of the transitory period.</p> <p>Compensation provided for the cost of re-establishing commercial activities elsewhere, the loss of net income during the transition period; and transfer fees and relocation of the plant, machinery or other equipment, as applicable.</p>
Assistance to resettled PAPs	The resettlement action plan (RAP) must include a restoration of livelihood plan, which will assist the affected people in restoring at least the same	PAPs should, in addition to the relocation allowance and disturbance support, receive assistance in their resettlement and livelihood restoration activities.	PAPs will, in addition to the relocation allowance and disturbance support, receive assistance in their resettlement through livelihoods restoration

TYPE OF ASSET	NATIONAL LEGISLATION	OP 4.12	MEASURES TO BRIDGE THE GAP
	level of life they had before and the respective monitoring plan.	Achievement of restoration to be monitored thereafter to ensure that objectives are met.	programmes and monitoring thereafter to restore or improve their standard of living where resettled.
Legal or customary owners of land and titled land	Eligible.	Eligible.	Eligible.
Illegal occupants	Not eligible.	Eligible (if they occupy the project area prior to the cut-off date) for compensation for loss of assets (other than land) and resettlement assistance (land, other assets, cash, employment and so on as appropriate) in lieu of the land they occupy, and other assistance as necessary to achieve the objectives of OP4.12. If family homestead, they must be provided with adequate housing.	Resettlement assistance including adequate housing with tenure security, and compensation for loss of assets (other than land); and support for the resumption of activities, if any, will be provided should PAP's occupy PPZ prior to cut-off date. Such cases will be confirmed through communication and participation with local communities and local leadership.
Tenants	Does not make provision for tenants.	Tenants must be compensated, whatever type of legal recognition of their land tenure (formal or informal).	Compensation for whatever the type of legal recognition of the land tenure, and support for the resumption of activities, if any. Tenants/lessees will be assisted in leasing similar land/homes, be compensated for transitional loss and assisted in re-establishing livelihoods.
Employees		Likewise, employees will receive compensation for temporary loss of earnings and assistance in seeking employment or establishing other livelihoods if employment is lost due to relocation.	All employees will receive cash compensation for temporary lost earnings and assistance in seeking employment or establishing other livelihoods if original employment is lost due to relocation.
Cut-off Date for Eligibility	No reference to cut-off dates evident in the Mozambican legislation.	Establish a cut-off date for eligibility so that new occupants of the project site will not be eligible, which must be well documented and disseminated throughout the project area.	A cut-off date for eligibility based on the census date will be agreed upon with the Technical Resettlement Monitoring and Supervision Committee and a moratorium issued preventing further development or settlement within the project area. This will be continuously communicated and explained through traditional leaders and during public consultations.
Disclosure of Information	Public consultations are to be held throughout the process, publicised through the main existing means of social communication and locations where notices are traditionally posted. <ul style="list-style-type: none"> ▮ The first public consultation must be conducted at the start of the resettlement process to inform the interested persons of the objectives, relevance and impacts of the process. ▮ A second meeting for presentation and discussion of the alternative resettlement areas. 	Resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement.	The disclosure or consultation required in terms of the Mozambican legislation limits consultation during and after consultation and resettlement. In order to comply with the requirements of the World Bank, consultation with the affected parties and communities will continue through the entire resettlement process and during the monitoring and evaluation process.

TYPE OF ASSET	NATIONAL LEGISLATION	OP 4.12	MEASURES TO BRIDGE THE GAP
	<p>▯ A third meeting must take place after the document is prepared – resettlement plan with budget and timeline.</p> <p>▯ The fourth meeting must take place upon completion of the document and prior to its approval.</p>		
Social Values compensation	No social cost of expropriation included	Includes the intangible cost of expropriation	Disturbance fee paid, and livelihood restoration includes transition support
Livelihood restoration	Limited provisions	Requires full restoration	LRP aims at full restoration plus and its effectiveness will be monitored against baseline
Sustainability of institutional services	No explicit requirements	Requires institutional arrangement for RAP implementation	Commitments of utilities and service providers
Vulnerability		Required particular attention to vulnerable PAPs	RAP will include provisions and budget to address case by case, and Vulnerability will be considered during consultation
Grievance Redress Mechanism (GRM)	A mechanism for filing claims and managing conflicts concerning the resettlement process is always necessary. The Technical Commission will handle claims from affected persons when no local solutions are possible between the proponent and the affected persons. The mechanism must establish a clear and well-defined time limit for the sustainable resolution of the claim (for example, a maximum of three weeks) and shall specify that the legal system may be used as final recourse for resolving the claim.	The client will establish a GRM consistent with OP4.12 as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.	A GRM is to be established that will allow for the raising of any concerns pertaining to the resettlement and compensation process. The GRM will function from when the development of the Final RAP commences, will have clearly stipulated timeframes for the resolution of complaints and will allow for both mediation and legal resolution of complaints. Compensation will be placed in escrow pending the resolution of any compensation-related claim.

In case of conflict between the Mozambican laws/regulations and World Bank OP 4.12, the most stringent (most favourable to the PAPs) will prevail

8 Compensation Methodology

The following section describes the methodology for compensation of the various assets that will be impacted by the STE Project, within the categories above described.

8.1 Loss of Land

All land, agricultural (including fallow land), residential, commercial and community land will be replaced in kind. Replacement land will be sought within the PAP's locality or community and will be identified through a consultative process (public participation) which includes, the PAP's, local communities and district and local authorities. All replacement land will be assessed and shall be equal or of greater value to that which is being replaced, including size, location (in relation access to infrastructure) and productivity. Where replacement land is deemed inappropriate or unacceptable by the PAP's, alternative options will be sought. These will include the possibility of monetary payments to a value acceptable to the PAP for the land and its associated structures (if PAPs are not vulnerable) or seeking alternative and acceptable replacement land elsewhere. These options, and particularly the monetary compensation, will take into consideration the vulnerability of the PAP's and the potential/likelihood of such families becoming destitute as a result of not having land to practice subsistence agriculture. This option is a last resort and will only be considered for HH's who are not vulnerable.

For land within PPZ that will be returned to current users with restriction, PAPs may opt for replacement land or may stay on current plot under legally binding use agreement between themselves and EDM. Such legally binding agreements shall make provision and commitments to resettle and compensate PAP's, should use be further restricted and/or EDM or other agency require the land. License for agreed uses will be obtained by EDM in favour of the PAP.

Formally registered DUAT titles or licenses for permitted uses within the PPZ will form part of the compensation package for all replacement land. All land where utilisation is limited and/or restricted (relating to *machambas* within PPZ) will be subject to a legally binding contracts between EDM and respective PAP's guaranteeing land tenure and resettlement should said land parcel be required by EDM at a later stage.

8.2 Loss of Houses

During the fieldwork, the consultants identified many houses which have a size greater than 70 m². The Mozambican resettlement legislation and the WB policies states that the affected person should at least restore the same standard of living which they had before the resettlement.

The Mozambican Decree 31/2012 of 8th of August, states that all affected houses must be compensated in kind, with houses of a minimum of 70 m², built in a plot of 800m² in urban areas and 5 000m² in rural areas. PAP's, who have larger homes, would be prejudiced would find themselves and their families in a significantly worse off circumstances than that which they had prior to the resettlement. For this reason, the compensation methods to be utilised for plots will be equivalent to current plots when larger, and for the actual houses it is divided into two categories, namely:

- Loss of houses with a size smaller than 70m²; and

- Loss of houses with a size larger than 70m².

8.2.1 Loss of Houses with Size Smaller than 70m²

The loss (partial or total) of habitational structures (main house and complementary housing structures) with size smaller than 70 m² will be compensated through the provision of replacement housing. Regardless of the layout and construction materials of the current structure, all PAP's will be compensated with structures built of conventional materials according to the following principles:

- One main house with three rooms per household;
- One exterior kitchen; and
- One exterior bathroom and toilet;

The area of the three above structures must add up to a minimum of 70 m².

All replacement land will be within the locality and/or community of the PAP. In addition, transitional assistance will be provided to all such HH's.

Whilst in-kind is the default option under this rubric, it is also acknowledged that where a replacement plot, fulfilling the necessary conditions is harder to come by, particularly in the more densely populated areas, HH's may be offered the option of monetary compensation, sufficient for them to settle in an alternate location and maintain their current standards of living. This alternate option will, however, be assessed on a case by case basis and such an assessment will take cognisance of the PAP's vulnerability and likely prospects of maintaining and/or improving their living standards. Unassisted cash compensation will not be available for vulnerable PAPs.

8.2.2 Loss of Houses with Size Greater than 70 m²

The loss (partial or total) of habitation structures (main house and complementary housing structures) with size greater than 70 m², may be compensated monetarily. The compensation will be at a full replacement value of the structure (market value plus transaction costs), allowing the affected PAP to construct the same structure in a different place. Such HH's will also be compensated through receiving plots of equivalent size and standards. An option of replacement land, of equal value and a standard replacement structure plus monetary compensation covering the difference in value will be offered to the affected PAP's. Transitional assistance will also be provided to all such HH's.

8.3 Auxiliary Structures

Loss (partial or total) of auxiliary structures such as *machamba* houses, will be compensated in kind, whenever possible. When not possible, the auxiliary structure must be compensated for monetarily at full replacement cost. The formula and the updated prices (corrected with inflation to the month of the resettlement) presented in the Ministerial Decree 181/2010, of 3 November can be used as a starting point and the final amount of compensation will be validated to ensure full replacement value at market cost plus transactional costs.

8.4 Infra-structures under Construction

Loss (partial or total) of structures under construction not intended as primary residence will be compensated monetarily. The compensation will be at full replacement value of the structure, allowing the PAP to construct the same structure in a different place in a plot of at least the same size provided through the resettlement process.

Should the infrastructure be identified as the HH's primary residence, it shall be considered as fall under the above compensation packages mentioned above (home of either smaller or larger than 70m²).

8.5 Loss of Crops

The loss of standing crops (agricultural products) during the agricultural season or if cropping cycles are lost or interrupted, will be compensated with monetary compensation at full replacement cost. Compensation values will, at minimum, be in accordance with the updated table from the Agriculture Provincial Department of either Maputo, Gaza or Inhambane Provinces, which indicates the current market values for different crops. The provincial compensation table will be validated by a market study and the highest price between the two sets of figures will be used in the compensation package.

8.6 Loss of Trees with Economic Value (Fruit Trees and Native Trees)

The HH's fruit trees that will be affected by the Project will be compensated for monetarily at full replacement cost. Compensation values shall, at minimum, be based on values established by the Agriculture Provincial Department of either Maputo, Gaza or Inhambane Provinces. The valuation will take the prime productive (highest) value of all trees, irrespective of age and productivity. The provincial compensation table will be validated by a market study and the highest price between the two sets of figures will be used in the compensation package.

8.7 Loss of Businesses Activities

Compensation for the loss of business, including the structures used for small shops located within the Project PPZ and the land upon which it is located, will be compensated in kind, whenever possible. When not possible the business structure will be compensated monetarily following the formula and the updated prices (corrected with inflation to the month of the resettlement) presented in Ministerial Diploma 181/2010, of 3 November, or the full replacement value, whichever is higher. When assessing the value of the business, consideration will be made in relation to the land upon which the business is located and the amount of compensation needed to enable the PAP to obtain a DUAT to similar land.

In case that the resettlement does not enable the affected business activity to be set up in a new location prior to resettlement, or where there is any other transitional interruption, the loss of income and time taken to complete the transition will be calculated and included in the resettlement compensation package.

8.8 Religious Temples

Compensation for the loss of religious temples, located within the Project PPZ will be provided in kind, whenever possible. When not possible and agreed with the community, the structure and the land on which it stands will be compensated monetarily following the formula and the updated prices (corrected with inflation to the month of the resettlement) presented in Ministerial Decree 181/2010, of 3 November, or at full replacement value (including the amount needed to obtain a DUAT to similar land), whichever is higher.

8.9 Loss of Cemeteries and Sacred Sites

8.9.1 Sacred Sites

EDM will work with communities to preserve sacred sites and ensure that they remain in place whenever possible. When it's not possible EDM will agree with the community on how to avoid significant impact on sacred places, each community will organise a ceremony in order to transfer the sacred site to a new location, in accordance with local religious beliefs and / or customs. EDM will absorb all costs related to any movement of sacred site, including ceremonies and other requirements needed to fulfil/adhere to norms.

8.9.2 Cemeteries

All reasonable efforts will be made to preserve and protect cemeteries in their current location and to ensure continued access by communities. Should the construction and/or operation of the line necessitate the exhumation of graves and translocation of graves, this activity will be monitored by local authorities. EDM will support all costs for exhumation and translocation of the graves including professional services as agreed with the community. Each community will organise a ceremony for the removal and translocation of graves according to local religious beliefs and / or customs.

8.10 Loss of Public and Social Infrastructures / Services

The Project will avoid impact on public infrastructure, however, when not possible, EDM will, in conjunction with the local authorities ensure the timeous replacement of such public infrastructure. The process of defining the appropriate compensation measures will include a negotiation with each relevant government department and will include a memorandum of understanding and the relevant budgetary arrangements.

9 Institutional Arrangements

9.1 Introduction

A number of institutions are involved in the STE projects land acquisition, resettlement and compensation processes. EDM, however, as the Project proponent, bears overall responsibility for the entire implementation process as well as that of ensuring that all legal and regulatory requirements are adhered to and that all processes conform to the lenders (World Bank) safeguards.

MITADER, the provincial and district authorities in all impacted areas are responsible for monitoring the implementation within their respective geographic area and enforcing EDM's compliance with the approved RAP and its associated processes. These lines of accountability, responsibilities and arrangements are guided by the national legislation on resettlement.

This chapter presents the institutions and entities participating in the implementation of the RAP and includes their roles and responsibilities.

9.2 Electricidade de Moçambique (EDM)

As the proponent, EDM is responsible for the entire resettlement process and as such is the entity coordinating, managing and financing all aspects of resettlement including those related to the ancillary facilities. EDM is responsible, amongst other things, for the following key specific activities:

- Procure all necessary goods and services related to the elaboration and implementation of the RAP including the contracting of consultancy services to elaborate the RAP and a reputable or a number of reputable civil society organisations to implement the livelihood restoration plan
- Participate in all relevant public participation process activities;
- Ensure processes adhere to and are respectful of social and cultural norms and practices of the affected communities;
- Ensure that the World Bank's social safeguards and the local legislative framework are adhered to and all necessary requirement applied;
- Interact with government and local authorities to ensure that duly identified land is delivered to the affected people;
- Participate, whenever convened, in meetings/sessions of the district monitoring and supervision technical committee (MSTC);
- Coordinate with and facilitate the work of the monitoring committees and ensure compliance with any recommendations thereof;
- Implement and manage a transparent and efficient suggestions and complaints resolution system (GMM);
- Set up internal monitoring and evaluation systems for the resettlement process to ensure obligations, timeframe, objectives, outcomes and outputs are met;
- Monitor and evaluate the performance of implementing partners managing relocation support, livelihoods restoration programme;

- Sign and comply with legally binding compensation agreements with all PAP's (individuals, HH's and/or communities or public entities). Agreements will include all entitlements (including restoration/disturbance/relocation) and an updated inventory of all assets shall be annexed to agreements;
- Ensure all entitlements are met. This includes the payment of all monetary compensation amounts, the organisation and implementation of 'in-kind' payments and the implementation of the livelihood restoration programme.
- Require and enforce compliance of contractors with the RPF for ancillary facilities, monitor performance and report thereon to the WB.

9.2.1 Independent RAP consultant

The independent consultant contracted by EDM is primarily responsible for the development and elaboration of the RAP in accordance with contract signed between consultant and EDM. The consultant is responsible for the following activities:

- Develop and submit the final RAP, in accordance with the national legislation, and the WBG policies to EDM;
- Conduct a census survey of all individuals, HH's, communities and community and/or public infrastructure affected by the Project;
- In conjunction with EDM, execute all necessary public participation processes, in a transparent and participative manner;
- Lead the participative process through which the local communities, local leadership and district authorities identify adequate replacement land and, if necessary, host area(s) to accommodate PAP's.

9.3 Ministry of Environment and Rural Development (MITADER)

MITADER as the competent authority responsible for approval and verification of the EIA and the RAP, including the granting of an environmental license, oversees the resettlement process and ensures its conformity with the approved RAP through the MSTC in accordance with the Ministerial Decree No. 155/2014.

9.4 Monitoring and Supervision Technical Committee (MSTC)

The MSTC is the entity set up to ensure and supervise the entire resettlement process and ensure that the rights and entitlements of the affected persons are observed. The MSTC is set up and structured in accordance with the Ministerial Decree No. 155/2014 and consists of two levels, one at provincial level and the second at district level. At the provincial level the committee is made up of 5 provincial directors (4 permanent and 1 dependent on the nature of the specific project). The district committee – accountable to the provincial committee – is a broad representative body consisting of 14 members, including representatives of the affected population, civil society, community leaders (from both affected community and host area) as well as the district authority.⁴ Effectively, in the Mozambican context, the district MSTC's act as the mechanism through which communities, their representatives and civil society organisations, engage, influence and monitor

⁴ For further details see section on legal framework

the RAP implementation process. In addition, should community members have concerns with the ongoing processes, such concerns are forwarded to the provincial MSTC and MITADER for action. MSTC's were set up in each district subsequent to the EIA and PSES having been provisionally approved (in accordance with the national regulatory framework) and the provisional licence granted.

The MSTC are responsible for the following activities:

- Review the RAP and make recommendations to district authorities related to approval of RAP;
- Ensure EDM are compliant with the RAP;
- Supervise the resettlement process and ensure that the rights and entitlements of those affected are observed;
- Communicate with the competent authorities on any irregularities or illegal action detected during the resettlement process;
- Receive complaints from affected persons and forward cases to the relevant competent authorities, where a resolution cannot be reached at local level, between EDM and the affected persons through the GMM, or should the affected person choose not to seek mediation through the GMM;
- Prepare resettlement monitoring and evaluation reports, in accordance with GoM guideline and procedures (such reports should be shared with EDM, however, such sharing remains the prerogative of the MSTC);
- Communicate and coordinate with EDM on issues of concern and specific areas to be addressed;
- Intervene and monitor all stages during the resettlement process;
- Ensure PAP's and local population are aware of their rights and obligations with respect to the resettlement process;
- Review the Public Consultation reports and provide opinion on resettlement issues.

9.5 Implementing partner

EDM will procure the services of implementing partners, either civil society organisations or private sector companies, in order to provide relocation support to the PAP's, implement the livelihoods restoration programme (as well as to manage the CCF). Implementing partners will be procured at district or provincial level, in coordination with the MSTC's and the WB.

The implementing partners are responsible for the following activities:

- Provide relocation support to the PAP's when required and as identified within the RAP;
- Implement the livelihoods support programme in accordance with the stipulations and results, outcomes and outputs defined in the RAP;
- Report to EDM on progress related to the livelihood's restoration programme (and CCF).

10 Implementation Process

The Request for Proposals (RfP) to be issued to select the Contractors for each STE Phase will include a specific requirement that the Contractor shall identify in his proposal his plan for necessary access roads, use of borrow pits and disposal sites and temporary construction camps / lay-down areas as part of his proposal, with due consideration to minimise impacts, and with the locations of such ancillary infrastructure to be agreed as part of concluding the contracts with the selected Contractors, refer Step 1 of the Resettlement Process as defined in Section 4 of this Annex. The RfP will include EDM's ESMP for the Project and a requirement that the Contractors develop their own Contractor ESMP (C-ESMP), for approval by EDM and no-objection by the World Bank. The C-ESMP shall form part of the contract to be entered into with the Contractors. The RFP will also include this RPF and a requirement that the contractor identify any resettlement impacts of its facilities and where necessary prepare and implement the respective site specific RAPs/ARAPs.

Immediately upon receiving Notice to Proceed under the contract, each Contractor shall commence Step 2 (Resettlement Screening) of the Resettlement Process as defined in Section 4, for approval by EDM, after which Step 3 shall be undertaken in close cooperation with EDM, leading up to approval by MITADER as required and no-objection by the World Bank of any needed site-specific RAP/ARAP.

Only after approval of Resettlement Plan documentation and payment of compensation and completion of resettlement measures (where required) shall the Contractor be allowed to commence establishment of the ancillary infrastructure required under the contract.

All work by the Contractor in respect of Ancillary Infrastructure shall be undertaken in full compliance with the approved C-ESMP this RPF and any approved RAP/ARAP, with independent monitoring to be provided by EDM (or a monitoring consultant appointed by EDM).

- **Grievance Redress Mechanism**

- **Background**

Interactions with the communities will occur frequently during the different phases of the Project. A community grievance is an issue, concern, problem, or claim (perceived or actual) that an individual or group or representative wants the company or contractor to address and resolve. Sometimes a simple complaint, if not addressed in a timely and proper manner, can escalate to a dispute.

Understanding and managing community and stakeholder issues and concerns is vital to the long-term successful relationship between EDM and the communities. Unresolved community issues can affect the Project adversely. Therefore, it is important that a simple and effective grievance management process is established and implemented.

This section provides for a specific Grievance Redress Mechanism (GRM).

- **Objective**

The GRM protocol will provide guidance to EDM for the management of suggestions and complaints of the community and stakeholders throughout the different phases of the Project, including the final RAP implementation phases as well as operational and monitoring phases. This protocol will allow EDM to:

- Understand the community's perception of Project risks and impacts so as to adjust its measures and actions to address the community concerns;
- Inform affected communities and stakeholders about the process which will be followed in response to grievances;
- Address and redress community complaints;
- Make available to the affected communities and stakeholders an effective complaints mechanism; and
- Map community suggestions, claims and concerns as an opportunity for continuous improvement; creating or changing an existing system and learning process.

- **Target Group**

The GRM protocol applies to any community or stakeholder (institutions, host community, groups and individuals) affected by activities of the STE Project including the actions of companies retained by EDM to undertake any work in the STE Project. The GRM protocol is broader in scope than the PAPs and the resettlement process. The GRM, as such, will be a tool aimed at addressing grievances of communities, groups and/or individuals along the STE for the entire duration of the Project (construction, implementation and decommissioning).

○ Principles

The GRM protocol is governed by the following principles:

Safety: Any interested or affected community member or stakeholder should feel safe and confident to raise a grievance or suggestion without fear of reprisal;⁵

Accessibility: The protocol should be readily available and easily accessed by any community member or stakeholder. EDM will take all practicable steps to remove potential constraints to access such as language, illiteracy and distance. EDM will use the local media and other means to disseminate the mechanism.

Timely: All grievances will be managed in a timely manner to avoid escalation to a dispute and cause major risks to the Project;

Respect: The community grievance resolution process will be in compliance with internationally recognized human rights standards, such as the Covenants on Economic, Social and Cultural Rights, Civil and Political Rights, Convention on the Elimination of All forms of Discrimination against Women (CEDAW), Convention of the Rights of Persons with Disabilities (CRPD), Committee on the Elimination of Racial Discrimination (CERD), and Convention on the Rights of the Child (CRC), all of which Mozambique has ratified;

Transparency and Accountability: The community grievance and suggestion process and outcomes will be sufficiently transparent to meet public interest concerns without compromising the privacy or identity of individuals. The process should likewise be and be perceived to be fair, independent and legitimate;

Predictability: The process will be consistently applied with clear timeframes for each stage and provide clarity on the types of process and outcomes that can, and cannot be offered;

Confidentiality: The GRM will provide channels where individuals will be able to lodge any grievance in a confidential manner without having to register his/her name.

○ Types of Complaints and Suggestions

There are three main types of complaints and suggestions, namely:

Individual: refers to a grievance or suggestion raised by an individual affected person/community member;

Group: refers to grievances or suggestions raised by a specific group of people such as gender group, disability, association, etc.; and

Community: refers to grievance or suggestion involving a whole community. These complaints may be made in a community meeting or by the community leader on behalf of the community explaining in this case the reason why this is a community complaint.

⁵ This includes providing a safe channel for SEA/GBV complaints in accordance with the SEA/GBV Prevention and Response Action Plan that is being developed and implemented under the STE Project ESMP.

○ **Receipt and Registration**

Consistent with the principle of accessibility, EDM will provide for complaints to be made through multiple communication channels, as follows:

Face-to-face verbal complaint: refers to an informal or formal conversation with a representative of EDM (Community/GRM officer), or the Consultants or other contractors responsible for the implementation of the resettlement or of the Project, or a member of the Resettlement Committee;

Written complaint: refers to a registration in a complaint book, formal letter or email or a note or similar lodged with the local leader or placed in the Complaint and Suggestion box;

Voice call complaint: refers to a phone call conversation to a dedicated (free of charge) number including message left on a voice message box.

EDM will make available a Complaint and Suggestion Book at certain locations (chiefs office/house, community centres where available, STE camps and work sites), in communities and any EDM premises. Any affected person can register a written complaint in this book. Assistance services to be available as stakeholders may need. As stated above, written complaints can also be submitted by formal letter, fax or e-mail. Complaint and Suggestion Boxes will also be available for use in off-hours and when PAPs seek anonymity.

In all cases of verbal complaint (face-to-face or voice call complaint), the receptor will fill the appropriate form at the Complaint and Suggestion Book to allow registering and processing. In these cases, the receptor should state/refer clearly the way he/she acknowledge the complaint or suggestion as well as preliminary information regarding the affected person (e.g.: name, community/institutions, issue, contacts).

Language is often a communication constraint (especially dealing with communities with low level of literacy). Thus, EDM will ensure that complaints and suggestions can also be made and responded to in the local languages. In this way, this protocol will adopt as the main communication languages: Portuguese and local languages (The GRM/Community officer will speak the local language). To take into account gender in ensuring that women do not feel intimidated lodging a grievance to a man especially with regards to sexual harassment and gender-based violence, EDM will ensure that women will be part of the grievance redress mechanism team at each active project locality.

Confidential options will be provided so that persons who might feel reluctant in lodging a grievance where they have to disclose their identity, especially when lodging a grievance related to an employer, gender-based violence and sexual harassment have access to the GRM. Thus, EDM will ensure that grievances can be lodged confidentially, through the telephone hotline, suggestion box or a third party.

○ **Dissemination of GRM**

Prior to the beginning of the construction of the transmission line, EDM and contractor will disseminate the GRM to the local population informing what is the process in lodging a grievance, complains or suggestions.

The GRM will be disseminated by:

- Community Public Participation Process
- Spots on community radio;
- Posters placed in each community
- Training of community leader in how to receive a grievance, complains or suggestion
- Grievance form left with each community leader

The dissemination of the GRM will be part of the Stakeholder Engagement Plan that will be developed for the construction of the transmission line.

○ **Suggestions and Complaints Management Procedure**

▪ **Suggestions Management Procedure**

Suggestions are normally easier to deal with than complaints. The management of suggestions shall follow the actions described in the following table.

Table 10-1 – Suggestion management methods

Stage	Action	Responsible Person / Entity
Presentation	Presentation of the suggestion using one of the communication channels (face-to-face interaction, complaints and suggestion book/box, email or voice call).	Affected person or stakeholder
Receipt and acknowledgement	Receipt of the suggestion; Suggestion record into complaints and suggestion book and grievance tracking system; Delivery of an acknowledgement letter to the affected person, within 5 working days	EDM Community/GRM Officer
Assessment	The focal point will direct the suggestion to the concerned STE unit which will consider its merits and discuss with EDM management as appropriate	EDM Community/GRM Officer
Answer	After due consideration of the suggestion, prepare a letter indicating result/outcome and deliver it to the affected person.	EDM Community/GRM Officer
Closing	After delivery of the answer letter, the matter will be considered closed. The EDM Community Relations Department or environment department will be responsible for any further action and reporting, if required.	EDM Community/GRM Officer

▪ **Complaints Management Procedure**

The management of a complaint is more complex than dealing with a suggestion and will follow the steps summarised in the following table.

Table 10-2 – Complaint management methods

Stage	Action	Responsible Person / Entity	Timing
Presentation	Presentation of the complaint using one of the communication channels (face-to-face interaction, complaints book/box, email or voice call).	Affected person or stakeholder	Day 1
Receipt and acknowledgment	Receipt of the complaint; Complaint recorded into complaints and suggestion book and grievance tracking system; Delivery of an acknowledgement letter to the affected person or stakeholder, identifying the contact person in the company who will be responsible for the matter.	EDM Community/GRM Officer	Day 5

Stage	Action	Responsible Person / Entity	Timing
Confirmation	Confirmation of the issues of the complaint at a meeting with the affected person; Preliminary agreement (if applicable).	EDM Community/GRM Officer Affected person or stakeholder	Day 7
Investigation and resolution	Notification to the MSTC; Complaint investigation and confirmation of alleged facts; Resolution proposal by EDM Community/GRM officer; Record of the resolution proposal on complaints in suggestion book and grievance tracking system.	EDM Community/GRM Officer Resettlement Committee Affected person or stakeholder Others as needed	Day 7 -14
Agreement	Meeting with affected person to communicate the resolution proposal, get mutual agreement and sign-off.	EDM Community/GRM Officer Resettlement Committee Affected person or stakeholder	Day 15
Closing	Delivery of a closing letter to the affected person or stakeholder; Record of the closure on complaints in the suggestion book and tracking system	EDM Community/GRM Officer	Day 16 - 17
Follow up	Implementation of any agreed actions and reporting to complainant	EDM Community/GRM Officer	Per schedule agreed/ report at least every 30 days until all agreed actions are complete d

EDM's Community Relations Department will manage the GRM and will coordinate with the Social Responsibility Department and other STE/EDM departments as needed. EDM will manage a community grievance within a 17 calendar days period of the receipt of a complaint and the PAP will be notified of the time for each step of the process. Where an investigation takes longer than 17 days, EDM will notify (in writing) the affected person in advance, indicating the reasons for the delay. EDM will always notify PAPs in writing of next steps and dates for same.

In the event of non-agreement with the decision about a complaint, the complainant may request that the complaint be escalated to EDM Directors, who will review the complaint and the process and communicate their decision to the complainant within 7 consecutive days. All requests for review will be lodged in the complaint book and tracking system. The grievance status will remain OPEN.

Where the complainant (s) are not satisfied with the resolution proposed by EDM Directors, he/she/they have the right to appeal to the Arbitration Committee. The Arbitration Committee will be composed of senior representatives:

EDM;

District Government authorities;

MSTC;

Community leader;

Representatives of the affected person's community (at least one man and one woman, and

Experts as needed and agreed.

Upon receiving an appeal, EDM will convene the Arbitration Committee within 5 calendar days or another period agree with the complainant. The Arbitration Committee will analyse the case, request additional information if appropriate, and arrive at a decision within 10 days of being convened or another period agreed with the complainant. Decisions made by this forum will be final, in what regards the scope of this grievance management protocol. If the complainant(s) do not agree with the decision of the Arbitration Committee, he/she can escalate the issue to the judicial system. Information about their right of escalation, and the appropriate judicial channel and available WBG grievance redress mechanisms (GRS and IP) to direct their complaint, will be provided to the complainant. This level of escalation, however, is outside of the scope of this management protocol. The following figure illustrates the complaint management procedure.

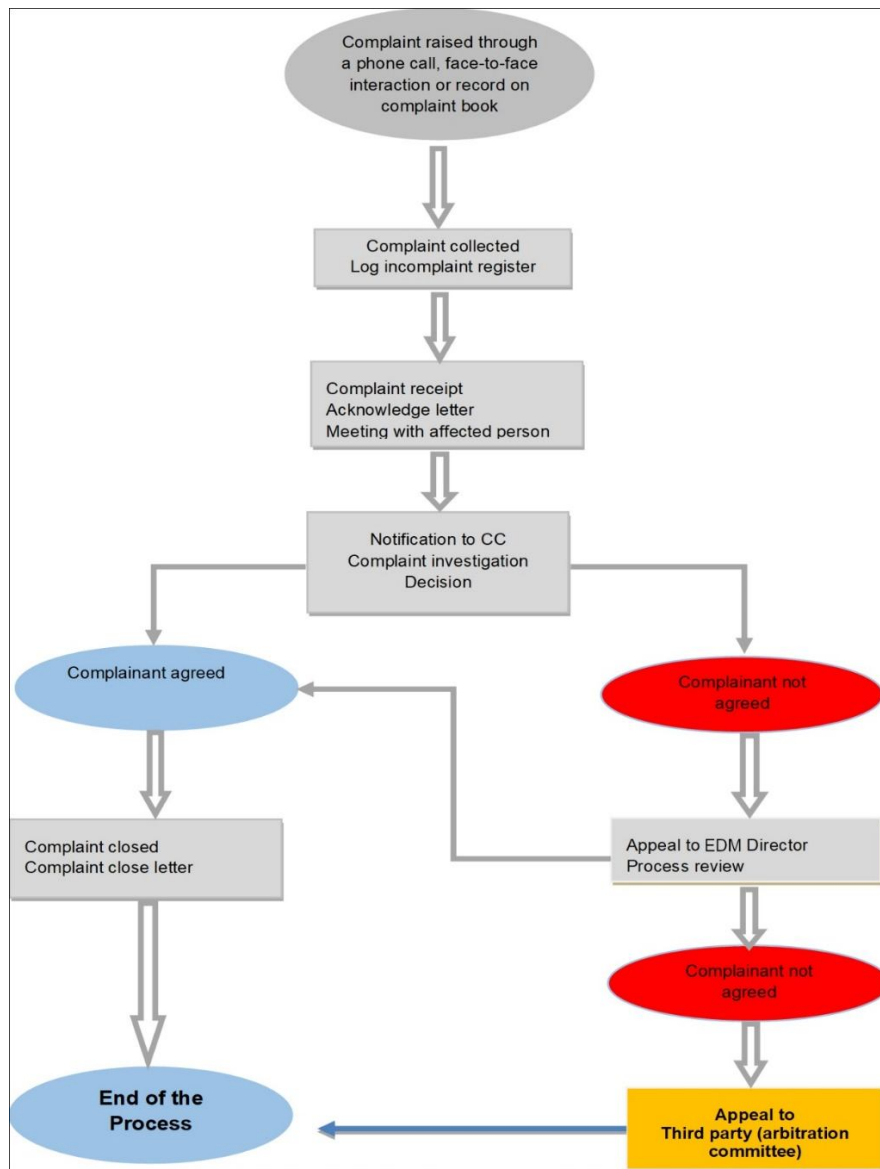


Figure 10-1 – Complaint Management Procedure

○ **Involved Parties and Accountability**

The community grievance and suggestion process will involve the following parties, with their accountabilities as follows:

Electricidade de Moçambique: EDM will be represented by the Community Relations Department, in coordination with the Environmental Department, SR Department and others as needed, who has responsibility to manage the protocol (internal and externally) including records, investigation, sign-off agreements and closing. Depending on the matter raised, another department head may be consulted to deal with the issue. EDM will also be responsible to make sure that contractors participate actively in the process by registering all grievances in the system and facilitating investigation and implementation of any construction related claims. EDM will also recruit a GRM/Community Officer to address grievance. Complaints and suggestions

EDM will report on all grievance in their Environmental and Social Report for the implementation of the project.

Affected communities: affected communities will be represented by the Resettlement Committee. The main responsibilities include complaint and suggestions reception, complaint investigation and provision of advice, when necessary.

Local government: The local government will be represented by the Chief of Locality who will have the primary role to witness the process and provide advice, when necessary. He will also be responsible to inform the District Government about the process, main decisions and agreements.

11 Funding Arrangements

The tender documents to be issued will include a requirement for the EPC Contractors to make provision in their proposal for undertaking and covering the costs associated with RAP preparation and implementation of the ancillary infrastructure which they require to undertake their scope of work. The EPC Contractors' bids will include a contingency fund of 5 to 10 %.

EDM will ensure that the Contractors has the institutional capacity and experience to undertake this task according to WB principles. EDM will also supervise RAP elaboration and implementation and will provide a Monitoring Consultant that will oversee what the Contractors do in this regard (as well as their general compliance with the C-ESMP).

12 Public Participation Process

According to international best practices and Mozambican Legislation, all Affected and Interested Parties (A&IPs) must be properly informed and participate during all phases of the resettlement process. The Mozambican Ministerial Decree 156/2014, of 19 September, states that during a resettlement process, a minimum of four public participation rounds need to be conducted.

This chapter presents the methodology and the main objectives of the Public Participation Process (PPP) that must be conducted during the development of the RAP.

12.1 First Round of Public Participation Process

The first round of public participation will take place simultaneously with the census field work and in each community that will be affected by the project.

The objective of this first round of public participation will be:

- To present the ancillary facility (and Project background as needed) to the affected communities;
- To present the possible impact which the Project may have in the communities;
- To present to the population what their rights are regarding the Project's impacts, and specifically regarding potential resettlement impacts (as stipulated in Decree 31/2012 of 8 August, and Ministerial Diploma 156/2014, of 19 September);
- To collect information regarding possible resettlement host areas in each community; and
- To hear and clarify any questions that the population may have regarding the project, and specifically regarding the resettlement process.

In order to arrange the public participation meetings, the Community Consultative Committee (formed for the PPZ and substation site RAP) will need to be previously informed of the date of the meeting and will be asked to mobilise the local population.

The meeting will need to be held in Portuguese and translated to the local language, all participants will must be given the opportunity to express concerns, comments or suggestions, about the project. In this meeting it must be presented a communication channel between the PAP, the contractor. A list of participants must be done and minutes of each meeting must be prepared and annexed to the final RPF report and Final Resettlement Report.

12.1.1 Second Round of Public Participation

The second round of the Public Participation Process should take place simultaneously with the Environmental Impact Study (EIS) public participation meetings or after the Resettlement Policy Framework/ Socioeconomic and Inventory Survey Report is finalised. The second round of public participation must take place in the District Capital and in each community and main objectives must be:

- To present the Resettlement Policy Framework/Socioeconomic and Inventory Survey Report;

- To present the resettlement impact;
- To present the mitigation measures proposed to be used to minimize the impact on resettlement;
- To present resettlement possible host area;
- To present the ToR for the Resettlement Action Plan; and
- To receive concerns and comments and to clarify any questions that the participants may have.

These public meetings must be announced 15 days prior in the local radio and national newspapers, informing the time and place and it will once again be requested to the Community Consultative Committee to mobilise the communities. A draft copy and a non-technical summary of the resettlement policy framework must be made available to the public. A copy also must be made available to the resettlement committees.

12.1.2 Third Round of Public Participation

The third round of Public Participation Process must take place after approval of the draft resettlement plan and resettlement action and implementation plan, by the proponent. The third round of public participation must take place in the District Capital and in each community and main objectives will be:

- To present the detailed host area study results;
- To present all detailed architectural designs;
- To Present the Resettlement Plan;
- To present the resettlement action and implementation plan; and
- To hear concerns and comments and clarify any raised questions

This public meetings must be announced 15 days prior in the local radio and national newspapers, informing the time and place. A draft copy and a non-technical summary of the resettlement plan and resettlement action and implementation must be made available to the public. A copy must be made available to the resettlement committees.

Minutes of the meeting must be taken, recording any questions, concerns or comments that the population may have about the Resettlement Plan and Resettlement Action and Implementation Pan. The minutes must be annexed to the final report.

12.1.3 Fourth Round of Public Participation

The fourth round of public participation process will take place once the Resettlement Plan and Resettlement Action and Implementation Plan is finalized preceding its approval by government authorities.

The fourth round of public participation must take place in the District Capitals and in each community and its main objectives will be:

- To present the final Resettlement Plan and Resettlement Action and Implementation Plan;
- Present the Implementation schedule;
- Present the following steps that will take place during the implementation of the resettlement; and
- To hear concern and comments and clarify any questions that the participants may have.

These public meetings must be announced 15 days prior in the local radio and national newspapers, informing the time and place. A draft copy and a non-technical summary of the resettlement plan and resettlement action and implementation must be made available to the public.

Minutes of the meeting must be taken, recording any questions, concerns or comments that the population may have about the Socioeconomic and Inventory Survey Report.

12.2 World Bank Disclosure Procedure

According to the WB OP4.12, and as condition of providing N/O to site specific resettlement plans the Proponent must submit to the Bank the relevant draft resettlement plans which must conform to WB policy. Also the proponent must make the site specific resettlement plans available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them. Once the Bank accepts a site specific resettlement plan as providing an adequate basis for authorization of an ancillary facility, the Bank makes it available to the public through its external Website. After the Bank has approved the final resettlement plan, the Bank and the borrower disclose it again in the same manner.

13 Monitoring and Evaluation

Restoration and normalization of PAP livelihoods usually is a slow process and it may take between 2 to 5 years, or even more, to achieve what is regarded to be the ultimate level of stability. It is expected that there will be intensive and fast changes in the first 6 to 12 months after resettlement. It is during this phase that timely and appropriate interventions are needed to correct possible and potential mistakes. The subsequent period may need less active attention but it will be important to have systems and procedures in place to ensure that the objectives of the RAP are achieved.

Monitoring and Evaluation (M&E) is an essential part of the RAP implementation to verify its effectiveness through real performance measurement when comparing with the baseline situation (before resettlement or before the project starts whichever is better) and taking into account the expected performance. This chapter presents the following proposed M&E aspects:

- Performance indicators of resettlement process;
- Internal monitoring process; and
- External and independent monitoring and evaluation.

13.1 Performance Indicators

For the M&E of the resettlement implementation process the RAP will include a series of performance indicators that give special attention to the standard of living and income level of PAPs. The following indicators must be fully assessed at the baseline and updated just before resettlement and monitored every year during implementation and for three to five years following:

- Number of houses built with conventional material;
- Number of PAP with DUAT title, the number of HH with DUAT title will indicate the stability of the PAPs after resettlement;
- Number of PAP remaining in resettlement area/parcel
- Time spent on daily activities (fetching water and firewood, travel to school and subsistence crop field);
- Time spent on occasional activities (going to the market, health centre and sacred sites);
- Number of HH with access to basic sanitation;
- Number of HH with access to social services;
- Infant and child mortality rate;
- Occupation / main income activity;
- Sources and Level of Income;
- Number of HH using agricultural inputs (such as improved seeds, fertilizers or pesticides). The use of inputs can increase agricultural production and reduce the time spent on ploughing and sowing;
- Number of durable assets owned by HH. A change in the number and type of assets owned by HH may indicate a change in the financial income and quality of life of HH after resettlement;
- Type of crops used in agricultural activities; and

- Change in financial income (level of income).
- Change in employment status
- Ownership of “durable” goods

These indicators shall be determined separately for the more vulnerable groups.

The monitoring of these Performance Indicators (PI) will be conducted through socio-economic surveys (censuses) or any other means of gathering primary level data. The socioeconomic data collected for preparation of the RAP will need to be reconfirmed/reassessed at the beginning of the implementation of RAP of the; and this reconfirmation will constitute a baseline for the performance indicators identified above.

The expected performance corresponds to the improvement of the standard of living and income level of the affected population, including as according to the stipulated in Decree No. 31/2012 (Article 10) and OP 4. 12.

The deviations and causes of the changes of these indicators should be carefully analyzed. Any change in these indicators may indicate a negative or positive influence on the living conditions of the PAPs.

The changes in the indicators (quantitative or qualitative) should be assessed to identify whether additional support is warranted and also if the changes were caused by external factors, in which case additional support may or may not be warranted.

13.2 Internal Monitoring Process

Monitoring must be used to confirm that the implementation is done according to plan, and if outcomes were achieved and to identify if there are problems and corrective measures should be implemented. The monitoring plan and schedule will be defined during the RAP preparation phase.

If it becomes necessary to make adjustments to an approved RAP/ARAP, the EDM team, will propose an addendum to the RAP and the scope included in RAP activities. These additions will develop indicators for implementation of the RAP, which will be submitted to the Government Monitoring Committee of the RAP as suggested in Decree No. 31/2012. All changes will be communicated to the WB and significant changes may require approval and redisclosure of the RAP.

EDM must elaborate monitoring and evaluation report and submit to World Bank, every six months.

13.3 External Independent Evaluation

The evaluation of the implementation of RAPs and ARAPs for ancillary facilities must be carried out by an independent consultant appointed by EDM, annually until one year after the completion of all activities defined in all site specific RAPs and ARAPs and a closing audit one year thereafter.

The monitoring and evaluation must assess:

- Extent, efficiency rate of financial resources, services provision and services and commitments established;
- Impacts of resettlement efforts, remunerations and development support regarding PAP socioeconomic situation, relating to initial conditions prior to resettlement – for example: assessment of whether standards of living were improved or restored;
- RAP effectiveness in the identification and assistance to vulnerable or “at risk” groups;
- Responsiveness to complaints and suggestions raised by stakeholders during the RAP development and implementation;
- Transparency and accountability of EDM in relation to the dissemination of information about the RAP implementation to the public, confirmation of the livelihood restoration process and possible remedial action.
- Identification of gaps and any needed corrective measures

All monitoring reports prepared by EDM, and evaluation reports elaborated by an independent consultant must be submitted to the WB.