



Stakeholder Engagement Plan

for

Senegal Stadium (Final)

Document Information and History

Owner	SUMMA Construction Company
Title	Stakeholder Engagement Plan
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Approved by	
Applicable to	Construction of Olympic Stadium of Diamniadio, Dakar Senegal
Purpose	To guide engagement with SUMMA's Project Stakeholders
Is part of	SUMMA's Environmental and Social Management System (ESMS)
Conforms to	<ul style="list-style-type: none">• International Finance Corporation (IFC) Performance Standards• IFC ESMS Handbook for the Construction Sector• Senegalese legislation• SUMMA Environmental and Social Policy
Related Documents	E&S Policy
Distribution	

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1. Introduction

Summa is embarking on the construction of a 50,000- capacity Olympic Stadium in the city of Diamniadio, Senegal. The site for the Project was allocated by the Senegalese government since the project is considered strategic for the national sports sector of the country. The development of the Project is planned to take up to 30 months, suggesting that there are likely environmental, social, and labour impacts associated with the construction phase. As a result, SUMMA has taken a proactive step to prepare a Stakeholder Engagement Plan to facilitate continuous consultation with internal and external interested and affected persons in relation to the Project.

This Stakeholder Engagement Plan (SEP) presents the planned stakeholder consultation and engagement process for the Project. The document outlines a systematic approach to stakeholder engagement that will help SUMMA cultivate and maintain over time a constructive relationship with their stakeholders throughout the duration of the Project. It also includes a reference to grievance mechanism for stakeholders to raise their concerns about the Project. The SEP has been produced in accordance with the international standards required by International Finance Corporation (IFC). The objectives of this SEP is i) to outline the stakeholder consultation and communication activities throughout the construction phase of the Project, ii) to identify the key stakeholder groups, and iii) to identify resources needed and length of time to achieve effective participation in each stage of the process.

2. Project Description

The Proposed project consists of a 50,000 capacity Olympic Stadium covering a total area measuring about 81,000m², with a maximum height of about 40m. There is a plan for the stadium to include parking spaces with a capacity for about 3,250 vehicles, wastewater treatment facilities and back-up power generators, and it will be surrounded by 10,000m² of green spaces (lawn and trees). Upon completion, SUMMA will transfer the project to the Societe de gestion des infrastructures publiques dans les oles urbains de Diamniadio et du lac rose (SOGIP) for operation.

The Olympic Stadium complex will be built on a site made available by the Delegation of the Urban Pole of Diamniadio (DGPU) on a parcel of land situated in Diamniadio which is located at ~43 km from Dakar, in the City of Rufisque (a city in the region of Dakar). Diamniadio is located to the South-East of Dakar in the Dakar-Thiès-Mbour triangle. It is bounded to the west by Dakar and Bargny, to the east by Diass, Sebikotane, to the north by Lac-Rose and to the south by the towns of Mbour and Thiès. The construction of the Olympic Stadium will be completed in approximately 30 months following the contract signing dates. Construction activities will be undertaken between five to six days a week, between 8 a.m. and 6 p.m. (10 hours) daily.

3. Legal Requirements and Standards for Public Consultation

3.1. Senegalese Legal Requirements for Public Consultation

The Senegalese regulations on management of environment is enshrined in the Environmental Code, which is the key legislative instrument that establishes the base rules of environment protection, treating environmental assessment as a tool used to assist competent authorities in decision-making. Decree no. 2001-282 is the legal implementation instrument, the regulation establishes four types of studies: a) Environment impact studies which apply to project or programs that may have a potentially important negative incidence on the environment; b) Strategic environmental assessment intended to assess environmental impacts of decisions made for policies, plans and programs; c) Audits of regulatory compliance for authorized exploitation units; and d) Initial environmental analysis intended for projects of reduced scope.

Provisionally, the Environmental Code requires that the facilitation of public consultation and disclosure of project information during the ESIA process was given adequate attention. For this Project, formal public consultations were carried out by SUMMA with the support of the local authorities. Comments from the public

was received within the period of 21 days after public announcement stating that the ESIA application file has been submitted. The comments received from the public have been incorporated into the development of the ESIA documents, including plans to reduce probable negative impacts on people as well as opportunities for improving the well-being of adjacent communities.

A draft ESIA was submitted to the Senegalese Directorate of Environment and Classified Establishments (DEEC). The final report has been fully approved by the regulatory authority and full compliance with all of the conditions of the authorisation will be observed during the construction. Other applicable measures will be instituted during the operation phases of the Project. In the course of the ESIA study, the consultant had undertaken consultation with local communities close to the Project environment. SUMMA understands that the engagement and consultation with stakeholders is a continuous process throughout the construction phase of the Project until it is delivered to SOGIP. The company is determined to operate in a manner that respects the rights of the community people and that ensures that they suffer no untoward impacts as a result of the project.

3.2. International Legal Requirements and Standards for Public Consultation Applicable to the Project

3.2.1. Aarhus Convention – the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. (Journal of Laws of 2003, No 78, Item 706)

The Convention facilitates the participation of non-governmental organizations in the decision-making process; ensures that assessment-related procedures are followed; provides for the need for consultation and access to information; ensures the public participation in the preparation of environmental plans, programmes and guidelines, as well as in the preparation of regulations.

3.2.2. International Finance Corporation (IFC) Performance Standards

The IFC Performance Standards 1 (Assessment and Management of Environmental and Social Risks and Impacts) and 5 (Community Health and Safety) require that projects conduct meaningful and responsible engagement and consultation with project-affected communities. The process, which is expected to run through the entire period of the project lifecycle, is aimed at ensuring transparency in the relationship with host communities. The IFC Performance Standards requirements consists of developing a Stakeholder Engagement Plan having already determining the key stakeholders of the project. The benefit of the SEP lies in reducing reputational risks and operational challenges due to community issues.

4. Preliminary Stakeholder Engagement and Consultation

4.1. Formal Consultation

During the ESIA process, environmental regulators and the local government and communities around Diamniadio were consulted to identify their concerns and interest in relation to the project. Examples of those consulted include youth association, local government authorities and relevant NGOs. The details of the consultation are well documented in the ESIA report.

4.2. Additional Consultation

Independent consultants engaged by SUMMA also conducted additional consultation during an environmental and social due diligence study, which was aimed at identifying negative risks and impacts that are inherent in the project development from the perspective of the financiers. The process also provided opportunity to better understand the concerns and interest of the stakeholders.

5. Identification of Stakeholders and Methods of Communication

SUMMA has committed to considering all stakeholders and state identified stakeholders for construction phase. The identification of stakeholders of the Project was conducted with considerations of the following principles:

- Persons and social groups to be affected, directly or indirectly, by the construction phase of the Project.
- Persons and social groups that participate, in a specific manner, in the implementation of the construction phase of the Project.
- Persons or social groups with the ability to influence and decide on both the outcome and manner of implementation of the construction phase of the Project.

Following these principles, the relevant stakeholders of the Project have been identified as follows:

Table 1: Stakeholder Identification

Stakeholder Types	Identified Stakeholders
Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	<ul style="list-style-type: none"> • Inhabitants of the city of Diamniadio • Inhabitants of Rufisque Municipality • Inhabitants of towns/villages located along transport routes • Local entrepreneurs
Stakeholders that participate in the Project Implementation	<ul style="list-style-type: none"> • SUMMA Contractors and subcontractors • Services and equipment suppliers • Haulage companies • Security Agencies
Stakeholders with the ability to influence and decided on both the outcome and manner of Project implementation	<ul style="list-style-type: none"> • SOGIP • DEEC • Ministry of Sports • Ministry of Infrastructure Development • Local/Municipal Governments

5.1. Internal Stakeholders

The following categories of stakeholders have been identified as internal:

- Shareholders of the company,
- SUMMA employees
- Project internal stakeholders: sub-contractors during the construction phase

5.2. External Stakeholders

The following categories of stakeholders have been identified as external:

- National, regional and local authorities responsible for permitting
- Local government authorities
- People living and working around the project site
- Other businesses with operations related to the construction industry
- Vulnerable groups. This group of stakeholders may include:
 - Elderly people, disable, and children who may be affected by environmental impact of the Project's construction activities
 - Poor families living in the vicinity of the project area of influence who may be exposed to impacts from the project.

Table 2: Stakeholders being able to influence and decide on both the outcomes and the manner of the Project implementation

Stakeholders being able to influence and decide on both the outcomes and the manner of the Project implementation	
Government and self-government administration authorities, control authorities	SOGIP Contact Details: +221 77 450 28 03 Mr. Alhousseyni NDIAYE Director of Developement
	DEEC Contact Details: +221 77 577 76 79 Mr. Abdoulaye SY
	Rufisque Municipal Authority Contact Details: 33 836 78 90
Ministries	Ministry of Sports Contact Details: +221 77 635 70 80 Mr. Cheikh Ahmet SARR Technical Director

5.3. Stakeholder Concerns Analysis

Summa is committed to systematic collection and analysis of stakeholder expectations and concerns, enabling the company to take appropriate responsive measures to address emerging issues. Towards this end, SUMMA has identified interests and concerns of the key stakeholder groups as presented in Table 5 below.

Table 3: Key Stakeholders Expectations and Concern Analysis

Stakeholder group	Key Expectations	Key Concerns	Recommendation
External Stakeholders			
National and local authorities	The Project will attract foreign investment	Environmental degradation	Continue dialogue and consultation
	The Project will improve the Sports Industry in Senegal	Failure to comply with national and local legislation	
	Further economic development of the country		
DEEC	Strict compliance with national environmental and social legislation		Continue dialogue and consultation
Residential and Corporate Areas in the vicinity of the Project	Creation of new workplaces;	Environmental and social issues	Continue with consultation
	Meeting the requirements of the environmental legislation;		Engage community continuously and explain the Project plans.
	Monitoring and mitigation of any environmental problems that may emerge in the future;		Work further to identify and manage issues / expectations.
	Benefits from Social investment programs (mechanism to be developed).		Held meetings with community leaders and residents. Inform the communities of the Project progress regularly.
Local businesses	Development associated with Project realisation or compensation for any	Loss of income	Continue consultations; clarify the potential for local business development.
		Lack of compensation	

Stakeholder group	Key Expectations	Key Concerns	Recommendation
	losses	for loss;	
Vulnerable groups	Is not identified in ESIA report indicating the area being a new settlement		
NGOs and other community based organisations	Are not identified in ESIA indicating that NGO's are not affecting/being affected at this stage.		
Internal Stakeholders			
SUMMA Shareholders	Project implementation as planned (time and budget consideration)	Project failure/ closure	Continue with consultations and dialogue.
SUMMA employees	Retention of employment Improved working conditions.	Job losses Transparency of recruitment policy Occupational health and safety Discrimination and unfair	Communicate the labour policy early in the process Establish incentives. Ensure effective grievance mechanism Effective OHS training and monitoring
Sub-contractors (employees)	Employment opportunities	Transparency of tendering and contracting policy Occupational health and safety	Effective OHS training and monitoring Communicate the labour and contracting policy early in the process.

5.4. Communication Methods

SUMMA has determined the appropriate communication methods for each category of stakeholders. This is summarised in Table 6 below:

Table 4: Methods of Stakeholders' Communication

Stakeholders Group	Means of Communication	Rules of Communication
Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	Company Office Company's website Public Information Bulletin Notice boards	In accordance with legal requirements and the local custom Direct communication (office), indirect through announcements issued to the public
Stakeholders (internal) that participate in the Project implementation	Exchange of correspondence, meetings	In accordance with the rules for internal communication, meetings and the grievance mechanism for workers (employees and contract labour suppliers)
Local entrepreneurs	Direct meetings, SUMMA's website	During the environmental procedure, and at the request / on demand. In accordance with the rules for internal communication, and the accepted custom
Particularly vulnerable social groups (the elderly, the disabled, children)	Consultation meetings – providing information, exchange of documentation and correspondence associated with projects. School workshops.	In accordance with the rules for internal communication, and the accepted custom. Direct communication (office), indirect through announcements issued to the public
Stakeholders (external) that participate in the Project implementation	Exchange of correspondence, meetings, training courses, design supervision	In accordance with provisions of an Agreement as concluded by and between SUMMA and a given organization

Stakeholders Group	Means of Communication	Rules of Communication
Local and regional administration and self-government authorities	Consultation meetings – providing information, exchange of documentation and correspondence associated with projects	During the consensus procedure – in accordance with administrative procedure requirements
State administration authorities, Ministries	Official letters	In accordance with administrative procedure requirements
Non-governmental organizations (NGOs) interested in the Project	Direct meetings, SUMMA's website	During the environmental procedure, and at the request / on demand.
Mass media	Exchange of correspondence, meetings, transfer of announcements, information and educational articles, etc.	In accordance with the rules for internal communication, and the accepted custom

6. Information Disclosure

SUMMA is committed to providing relevant information to all categories of stakeholders using appropriate communication media (website, informational board, newspaper, letters, emails, etc.) in a planned manner and based on request.

7. Stakeholder Engagement Programme

7.1. Stakeholder Engagement Programme

SUMMA is committed to a transparent approach in providing access to project-related information and will establish the following measures for the implementation of the SEP. A detailed stakeholder engagement programme is presented in Table 8.

7.1.1. The Company's Website

SUMMA's website is available to all project stakeholders and relevant links to this document and grievance forms will be provided. The company will use the website to communicate information on the project, its progress and timelines. Also, the website will provide access to parties to give feedback on the project, as well as register any grievance related to the development of the project.

7.1.2. Bulletins

As part of the measures to ensure access to information, bulletins will be prepared and made available in the Project office and the Municipality Office. The contents of the Bulletins will include important information on the project, any possible inconveniences to the residents and the traffic during the construction. Also, they will provide information on the contact with SUMMA, as well as details of the possibility of access to the Grievance Mechanism.

7.1.3. Participation in events the municipality and Supporting Local Development Initiatives

SUMMA will endeavour to demonstrate solidarity with the host communities through participation in local events and initiatives that relate to the development of the people; for example, engaging local youths on community development. In addition to providing opportunities to engage more with the community, it is our belief that this will strengthen the good relations between the people and the project.

7.1.4. Public consultation and direct meetings

As necessary, SUMMA will conduct public consultation and direct meetings with stakeholders on an ongoing basis during the implementation of the Project.

7.1.5. Notice Boards

On the project site, SUMMA will erect notice boards in strategic places to display the most up-to-date information on the development of the Project, and key information pertaining to the well-being of the communities.

7.1.6. Project/ Site Office

The project/site office will maintain an open-door policy and provide an opportunity to submit comments/complaints, as well as access to the Project documentation.

7.1.7. Communication through employees and contractors

SUMMA will continue to engage internal stakeholders through information meetings about the most important risks and impacts.

7.1.8. Placing of information signs

Relevant signs will be displayed in strategic locations concerning the existing risks associated with the project implementation.

7.1.9. Reports of the post-development analyses and monitoring

As required, disclosure of relevant reports will be published and/or forwarded to appropriate authorities/institutions in accordance with national and international regulations.

7.1.10. Grievance Mechanism

SUMMA has established a process for receiving and addressing grievances submitted in relation to the project, both for internal and external stakeholders.

8. Stakeholder Engagement Schedule

SUMMA has prepared a schedule for stakeholder engagement as detailed in the Table 7 below.

Table 5: Stakeholder Engagement Schedule

Stage of the Project	Schedule	Measures
Preparation and obtaining of permits	Implementation of the stakeholder engagement plan As from the submission of documentation – on an ongoing basis	<ul style="list-style-type: none">• Making publicly available of the SEP• Launching the grievance mechanism• Informing of the course of proceedings as regards Environmental Impact• Assessment and obtaining the building permit
Construction	A minimum of 30 days prior to the commencement of construction work Commissioning and hand-over to operation	<ul style="list-style-type: none">• Information for municipalities, enterprises and inhabitants prior to the commencement of construction work, and reminding of the contact details and the grievance procedure – information in local newspapers.• Establishing rules for submitting comments for the construction firm employees.• Information for municipalities and inhabitants, information in local newspapers

Table 6: Stakeholder Engagement Programme

Stakeholder Group	Engagement method	Informational Materials	Location	Responsibility (People/Organisation)	Timeline
External Stakeholders					
All external stakeholders: All-level authorities Local communities Vulnerable groups Other parties: NGOs, educational, mass media and community based organizations, etc.	Inform on the project implementation status, collect opinions and concerns during annual public meetings; Post news on the Company's website; Register, analyse and address comments submitted online	Presentations; Booklets and progress leaflets; Online news	Library or other public facilities having adequate space	SUMMA Project Team / Stakeholder Management Team / Communications Department	Annually during construction
Local authorities	Organize open doors and annual meetings; Inform of the take-on commitments via sharing the approved ESAP; Submit annual reports and ask for feedback.	Presentations / reports	Project site, Company offices, authorities' office	SUMMA Project team and Communications Department	Annually during construction
National and regional authorities, in particular, environmental and safety controlling and supervision bodies	Inform of the taken-on commitments via sharing the approved ESAP; Submit regular reports and ask for feedback	Presentations / reports	Project site, Company offices, authorities' office	SUMMA Project team and Communications Department	Regularly (OR, as agreed) during construction
Local communities	Analyse the local socio-economic conditions in the project area of influence, focus on vulnerable groups Consult the local communities about their views/opinion on project implementation	Project description and general impacts at community level Relevant Project documentation; Public grievance forms	Community settlements SUMMA's representative visiting communities' settlements	Representative of SUMMA / Consultant Stakeholder Management Team / Communications	Monthly Annually / Ad hoc meetings as needed

Stakeholder Group	Engagement method	Informational Materials	Location	Responsibility (People/Organisation)	Timeline
	and impacts provided via grievance mechanism and target group meetings, as necessary.	(distributed, published in the local media, posted on the Company's website for printing out / downloading / electronic submitting)			
Other parties: NGOs, cultural, educational, mass media and community based organizations, etc.	Individual meetings (on specific matters) Email or phone communication (to be properly registered)	Booklets and progress leaflets	Project site, Company offices	SUMMA representative; Project team; Communications Department	Ad-hoc meetings / communication, as needed
Internal Stakeholders					
Shareholders of the Company	Inform, consult, and involve in strategic decision-making processes via constant reporting on project implementation status, annual reports and direct meetings and shareholders board meetings	All reports and official documents; Project development status	Company or shareholders headquarters	SUMMA management	On-going
Company employees	Inform of the Company Project plans in relation to labour issues; actual impacts on the local communities; Inform on the internal Project development issues, success and difficulties	Leaflets, Presentations, Newsletters	Project site, Company Office	Project team and communication	Quarterly during construction and operation
Contractors	Inform via direct meetings and reporting	Monthly reports are to be received from contracts about project progress Monitoring reports are to be prepare	The Company office and/or contractors office	SUMMA's representative / Contractor's representative	Monthly / Annually

Stakeholder Group	Engagement method	Informational Materials	Location	Responsibility (People/Organisation)	Timeline
		together with the contractors			
Employees of the contractors	Inform the employees and contractors about labours and safety issues via direct meetings and information notes	Human resources policy and grievance mechanism; safety and environmental policy and rules; method statements	Construction camps / Contractors' office	SUMMA's HSE Manager	During construction, when contracting the construction companies

9. SUMMA Contact Details

Community Liaison Team of Summa is as follows;

- 1) MAME DADO NDIAYE +221 783051059
- 2) EL HADJ THIerno MOUSSA GUEYE (HR DEPARTMENT) +221 776950573
- 3) OUSMANE MICHEL BADJI (HSE RESPONSIBLE) +221 774027142
- 4) MAME BOUNAMA WELE (LOGISTIC RESPONSIBLE) +221 781649965
- 5) BOLI NIANG DIEYE (HR DEPARTMENT) +227 81020023

APPENDIX 1: Grievance Form



Grievance Form

PART A	Location:	Complaint Number	Date Received
Name:	Method of Response:		
Address:	Verbal (in <u>person</u>)		<input type="checkbox"/>
Contact Method:	Verbal (<u>telephone</u>)		<input type="checkbox"/>
	Written (personally <u>handed</u>)		<input type="checkbox"/>
	Written (Emailed/ <u>Mailed</u>)		<input type="checkbox"/>
	Written (Notice <u>Board</u>)		<input type="checkbox"/>
PART B COMPLAINT			
<p>Name: _____ Signature _____</p> <p>Date: _____</p>			
PART C RESPONSE FROM SUMMA			
<p>Name: _____ Signature _____</p> <p>Position: _____ Date: _____</p>			
PART D VERIFICATION OF RESPONSE AND CORRECTIVE ACTION (IF <u>REQUIRED</u>)			
PART E ACKNOWLEDGE RECEIPT OF RESPONSE			
<p>Name: _____ Signature _____</p> <p>Date: _____</p>			