



How to Implement

STAKEHOLDER MAPPING

into the Programmatic
Approach of the Climate
Investment Funds

STAKEHOLDER ENGAGEMENT

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ANNEX:
Stakeholder
engagement policies
across multilateral
development banks
(MDBS)

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Objective and structure of the guidance note

It is a shared understanding within the CIF that the challenges of climate change need to be addressed by all those affected by them. For this reason, stakeholder engagement is one of the fundamental principles of the CIF. The CIF is committed to providing guidance to member countries and other involved actors on how to build up and strengthen their stakeholder engagement strategies. With this in mind, the objective of the following guidance note is to provide a practical resource for the governments and their partners developing investment plans in identifying and analyzing the stakeholder base that will be impacted by or that may have an interest in an investment plan. The timeliness and robustness of stakeholder mapping has a major bearing on the success of the entire process of stakeholder engagement, which is key to promoting local ownership of the investment plan. The ownership is critical for subsequent successful implementation, as stressed by the CIF governance and programming documents.

In 2015, the CIF welcomed 10 new countries to the Pilot Program for Climate Resilience (PPCR) and 15 to the Forest Investment Program (FIP)—from a pool of over 70 applicants—to expand the CIF's reach to 72 countries. As new countries join and ready themselves for the development of investment plans, the CIF has also seen other countries experiencing delays in endorsing their plans, and countries embarking on the task of monitoring and reporting of how investment plans delivered on their objectives. Within this context, stakeholder mapping is very likely to gain in importance, so this reference material comes even timelier.

The note opens with a brief introduction to the CIF and how it operates to achieve its goals, proceeds to a conceptual discussion of stakeholder engagement, then applied practically to the objectives of the CIF. Following that some basic concepts around stakeholder mapping are explained and a business case for mapping is presented, closing up with a step-by-step stakeholder mapping guidance.

THE CLIMATE INVESTMENT FUNDS

Objectives and programming

The Climate Investment Funds (CIF) were established as a global partnership to help address the challenges posed by climate change to development. The funds consist of a set of financing and risk mitigation instruments (including grants and highly concessional financing) that help developing countries achieve climate-resilient, low carbon development. As such, they are designed to simultaneously deliver strong development and climate outcomes.

As of December 31, 2015, the CIF had received approximately \$8.3 billion in pledges from 14 contributor countries to support large-scale, high impact investments in renewable energy, energy efficiency, sustainable transport, climate resilience, and sustainable forest management in 72 developing countries.

To ensure these public resources are strategically deployed to achieve maximum results, the CIF adopts a **programmatic approach** to investing. Within this approach countries are encouraged to strategically plan a series of investments – referred to as the **investment plan** – that mutually reinforce each other rather than one-off projects. Countries take the lead in structuring their investment plans and aligning them with their priorities by targeting specific technologies, geographical regions, vulnerable groups, or development approaches through partnerships with multilateral development banks (MDB).

MDBs play a key role in the programmatic approach of the CIF. Given their ability to provide highly concessional financing as well as extensive technical knowledge, they are responsible for designing and implementing the projects conceived under the umbrella of an investment plan. Each project is planned and executed in compliance with the environmental and social policies of the implementing MBD (see Annex 1 for details) and subject to a formal impact assessment process. The responsibility for developing investment plans, on the other hand, sits with the host governments of participating countries. Even though this stage precedes actual project development and implementation by a significant amount of time, already at the stage of preparing the investment plan, far-reaching impacts are conceptualized and considered. MDB safeguard policies, including stakeholder engagement, however, are not triggered until the project stage. To facilitate the understanding of the objectives of the investment plan and eventual endorsement, the process of engaging all relevant stakeholders should commence when the investment plan is being developed.

This reference document defines the concept of mapping, situates it within the broader stakeholder engagement framework, provides step-by-step practical guidance for integrating it into the investment plan, and illustrates the process with relevant examples from multiple CIF engagements.

BOX 1 THE MDB PARTNERS OF THE CLIMATE INVESTMENT FUNDS

- ▶ African Development Bank (AfDB)
- ▶ Asian Development Bank (ADB)
- ▶ European Bank for Reconstruction and Development (EBRD)
- ▶ Inter-American Development Bank (IDB)
- ▶ World Bank Group (WBG), including the International Finance Corporation (IFC)

STAKEHOLDER ENGAGEMENT WITHIN THE CIF

Brief conceptual and organizational framework

The CIF is distinguished by a uniquely broad-based and inclusive governance structure. Within each of the CIF programs, governments and MDBs work with other development partners, including the United Nations (UN), bilateral development agencies, civil society organizations (CSOs), indigenous peoples' groups, and the private sector.

The CIF recognizes stakeholder engagement as essential to ensuring local **ownership** and ultimately also the **sustainability** of development and climate outcomes. **Stakeholders** are broadly understood as individuals and groups who are – to a varying degree – **affected** by an investment plan's footprint, those who may have a **bearing** on its **outcomes**, as well as those who **perceive** themselves – whether accurately or not – to be included in either of these groups. Depending on the objectives of a given investment plan, different stakeholders may be identified as relevant at different stages of its execution.

Including the voices of stakeholders affected by an investment plan promotes more **transparent** and **inclusive** decision-making processes, increasing **accountability**.

Engagement is also a **risk assessment** tool, broadening the knowledge pool about the environment in which the investment plan will operate and helping to navigate the challenges that its design will need to address.

In this sense, it also helps to effectively allocate resources and increase **efficiency**. As such, the process of stakeholder engagement is not an end in itself, but a means to more inclusive and sustainable design and delivery of CIF projects.

Right from their establishment, it has been the clear intention that the CIF programs follow highly transparent and consultative processes for planning and implementation, entailing much fuller stakeholder engagement

than would normally be expected for programs financed and supported by MDBs – as are the CIF programs. This has been emphasized repeatedly by the governance mechanisms, particularly the CIF Trust Fund Committees and Sub-Committees.

Operationally, the implementation of an investment plan proceeds according to the environmental and social framework of the partnering MDB. However, already at the stage of the development of an investment plan – when none of the safeguard policies are formally triggered – there exists a need to build a stakeholder framework which will facilitate broad ownership of the investment plan at the country level.

“While government leads the preparation of the investment plan in collaboration with the MDBs, it is expected that these partners will also engage with all stakeholder groups relevant to the development and implementation of the plan, including non-MDB development partners, civil society, and the private sector, as well as government line agencies and semiautonomous government bodies.”¹ Broad stakeholder engagement – based on inputs and feedback from all relevant parties – is thus critical for establishing country ownership of the investment plan.

¹ ADB & CIF (2013). Stakeholder engagement in preparing investment plans for the CIF, p.2

BOX 2 KEY PRINCIPLES OF EFFECTIVE STAKEHOLDER CONSULTATION IN THE CIF

- ▶ The Governments, CIF Administrative Unit and the MDBs acknowledge and actively monitor the concerns of all legitimate stakeholders, and take their interests appropriately into the attention of the Trust Fund Committee decision-making or other decision making body and make appropriate suggestions for operations at the country level.
- ▶ The Governments, CIF Administrative Unit and the MDBs recognize that stakeholders in particular many CSOs can, and would, play dual roles as critics and allies or partners.
- ▶ The Governments, CIF Administrative Unit and the MDBs listen to and openly communicate with stakeholders about their respective concerns and contributions, and about the risks that they assume because of their involvement with the CIF.
- ▶ The Governments, CIF Administrative Unit and the MDBs administration Unit adopt processes that are sensitive to the concerns and capabilities of each stakeholder constituency.



STAKEHOLDER ENGAGEMENT is the process of identifying, engaging with and eliciting the opinions of groups and individuals who could be affected by an investment plan or who have an interest in it, prior to its design and execution; taking into consideration power imbalances between different parties and ensuring active, free, meaningful and informed participation of all parties. The process has an on-going nature and involves regular feedback.

TABLE 1
 THE CIF STAKEHOLDER BASE

PUBLIC SECTOR	PRIVATE SECTOR	CIVIL SOCIETY
Contributor and Recipient Country Governments	CIF Observers	CIF Civil Society Observers
Multilateral Development Banks	IP Implementing Companies	CIF Indigenous Peoples Observers
UN and UN Agencies	Industry Associations	Communities, Media, Academia, International and Local CSOs

STAKEHOLDER ENGAGEMENT

Building blocks

People involve themselves in decision making because they believe in the importance of issues at stake and that their participation will make a difference*.

* ADB (2012). Strengthening Participation for Development Results, p. 4

While stakeholder engagement is a process that requires tailoring to the particular characteristics of a given CIF program and investment plan, as well as scaling it to the risks involved, there are some common rules that contribute to realizing its goal of improved investment plan design and delivery. They are as follows:

1. BEGIN AS EARLY AS POSSIBLE

Building honest relationships is a time-consuming process, particularly if there is a legacy of mistrust between any of the relevant stakeholders, such as communities, civil society actors, private sector companies or the government. Thus, starting the process of stakeholder engagement as early as the scoping mission increases the chances of success. Expectations or reservations among stakeholder groups affected by an investment plan are likely to be present long before any engagement on the ground commences. Any concerns, whether real or perceived, will be more tractable when acknowledged and addressed in the earlier stages of the investment plan design process.

2. ENSURE PARTICIPATION IS VOLUNTARY

The use of compulsory measures for assuring stakeholder 'buy-in' should be avoided by all means possible. Coercion, bribery, setting unrealistic expectations or misrepresentation will undermine genuine understanding and ownership at the local level and can ultimately result in creating serious legacy issues for the investment plan, effectively delaying endorsement.

3. APPOINT RESPONSIBILITY

It must be stressed that the responsibility for coordinating the process of stakeholder engagement is shared and understood throughout all levels of the implementing government agencies, but also clearly defined and linked to concrete deliverables. It can be helpful to designate a focal point for each of the major stakeholder groups to make it easier for them to cooperate on the execution of a stakeholder engagement strategy.

4. INCLUDE ALL VOICES AT ALL STAGES

All relevant stakeholders should be presented with an opportunity to engage in the project. This engagement should not be limited to a formal consultation stage, but should be an ongoing process throughout the design and delivery of an investment plan. This entails a careful identification and a holistic analysis of stakeholders. This is the focus of this Guidance Note and is discussed in detail beginning from the next section.

5. TWEAK ACCORDING TO RISKS AND IMPACTS OF THE INVESTMENT PLAN

Because stakeholder engagement is a process that is both time- and resource-consuming, manage the engagement according to likely impacts and risks involved in the Investment Plan. These will also be identified, or at least estimated, during the mapping stage.

6. FOSTER ACTIVE TWO-WAY PARTICIPATION

The point of effective engagement is not simply to relay information to affected stakeholders, but engage them in a communication process that will elucidate their interests, expectations, concerns and fears. It also means that parties will jointly work on addressing them in the investment plan design and that all of them will have some input into the decision-making process.

7. DOCUMENT THE ENGAGEMENT

Apart from fostering transparency and accountability, recording the outcomes of consultations will help in establishing benchmarks for how well the investment plan has delivered on its objectives. As such, it may also be used as a knowledge resource for subsequent projects within and across investment plans, improving the stakeholder engagement learning curve across the board. Finally, it may be a useful reference in case disputes emerge between different stakeholder groups during implementation. Typically,

records of stakeholder engagement will comprise an engagement strategy framework, notes from consultation sessions including dates, participant lists and key issues discussed, as well as any agreed points of action and progress on their delivery. Joint and scoping mission documentation provides a repository of information regarding the mapping, consultation, and feedback collection.

It is important to emphasize that the input (...) should be carefully recorded and made publicly available, to demonstrate respect for the consultative processes. Stakeholders may well offer objections to current thinking, argue for alternative or modified approaches, point to negative social, environmental or governance impacts (and how to address) and make suggestions for the ongoing engagement process. All such inputs may be valuable and could pinpoint appropriate operational roles for some particularly thoughtful and knowledgeable stakeholders.

BUILDING BLOCKS OF EFFECTIVE ENGAGEMENT

Stakeholder analysis enables a broader range of perspectives to be heard and understood and contributes to a better understanding of the social relations among and between various groups.

Stakeholder engagement is an umbrella term used to define a range of activities over the life cycle of an investment plan whose objective is to involve affected and/or interested parties in its design, implementation and monitoring. The CIF recognizes three main modalities for stakeholder engagement: facilitation, consultation, and partnership. Each of them correspond to a different depth of engagement which, in turn, depends on the level of impact of a given investment plan, partnership being the most robust one.

These three modalities encompass what are traditionally considered the key building blocks of effective stakeholder engagement – from mapping to feedback collection – discussed in more detail below. Although these steps are discrete, it is important not to think of them in purely sequential terms, but rather as connected processes that build on each other and continue throughout the life cycle of the investment plan.

1. STAKEHOLDER MAPPING & ANALYSIS

This first critical step of the process consists in a careful and thorough identification of stakeholders and a holistic analysis of the interests they represent, as well as their capacity to engage, resources at their disposal, and finally their established means and networks of communication.

One thing not to be overlooked at this stage is the granularity of the stakeholder base: there may be divergent groups and interests involved that might too readily be subsumed under general labels, such as “community members,” “the government,” or “the private sector.” Quite often there is an impulse to treat these stakeholder groups as speaking with one voice. Factors such as age, gender, ethnic and cultural background, modes of organization and capacities to engage may give rise to divergent interests within the identified groups, different concerns about investment plan impacts, and ideas on issues such as mitigation measures and benefits distribution. Thorough analysis of stakeholder enables one to gain deeper insights into the network of social relations – including differences of opinion and rivalries – and influences that will have a bearing on the investment plan.

It is important to remember that although it is the first step of the process, mapping needs to be revisited periodically, particularly if there are substantial changes to the investment plan design and objectives.

The end product of this phase should be a stakeholder engagement plan to formalize and guide the involvement procedure. The plan should be publicly disclosed.

2. INFORMATION DISCLOSURE

“All other activities, from consultation and informed participation to negotiation and resolution of grievances, will be more constructive if stakeholders (...) have accurate and timely information about the project, its impacts and any other aspects that may have an effect on them.”² The critical elements for effective information disclosure include timeliness and broad accessibility. The rationale behind timely disclosure is that despite the fact that the investment plan may not even have been finalized yet, opinions regarding it, sometimes inaccurate, may have been formed at this very early stage. Prompt information disclosure, even in instances where it is not mandated by law, will help dispel misunderstandings and contribute to building an accurate public perception of the plan’s impacts and objectives.

Successful information disclosure also requires making the information broadly accessible, meaning that it will build on the channels for communication that are used by the given stakeholders and that it will be available in their languages. This point is of particular importance for the CIF, as a typical investment plan may include large amounts of technical information that is not readily accessible to the general public.

² IFC (2007). Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, p. 27

BOX 3 OVERARCHING APPROACHES FOR ENGAGING STAKEHOLDERS WITHIN THE CIF

- Facilitation: the facilitation approach of the CIF’s stakeholder engagement includes servicing the stakeholders by disseminating information in timely manner including invitations to key meetings, and responding to their requests for information. The facilitation aspect also includes bringing information to the attention of the broader stakeholders. The principle of access to information is central to the CIF stakeholder’s engagement approach. This implies that all documentation is available on the CIF website and country SPCR on the respective government’s website to any interested group or individual to increase transparency in the CIF decision-making and promote meaningful participation.
- Consultation: the CIF’s stakeholders engagement through consultation centers at seeking the stakeholders views on the design of SPCR, operational activities, monitoring and evaluation, results and impacts. The major platforms for the stakeholder consultation are joint missions, the development of SPCR, SPCR revision, and project development. Key stakeholders including representatives of government agencies, civil society, indigenous peoples, local communities, bilateral agencies, private sector, and others come together to discuss about stakeholder perspectives, concerns, experiences, reflections and lessons emerging from CIF work.
- Partnership: the Partnership approach for the CIF stakeholder engagement includes motivating and encouraging stakeholders to be involved in the implementation of the CIF projects as service providers and project implementers. The CIF might also advocate for small grant mechanisms, which can provide direct support for CSO and IPs initiated activities.

While a good website may be appropriate for informing the highly educated international NGO community, it is less likely to be relevant to a Quechua-speaking community in the high Andes or to the inhabitants of a squatter settlement in Rio de Janeiro or Port au Prince.*

* IDB (2013). Guidelines on Stakeholder Participation, p. 7

Using multiple dissemination channels – e.g. complementing materials posted on the Internet with face-to-face meetings – helps to further foster accessibility and prevent the exclusion of some groups. Within the CIF context, besides publishing documents on the government and CIF websites, hard copies should be made available for those who lack reliable access to the Internet, particularly in the proposed program areas; libraries and NGO resource centers would be appropriate repositories, as was the case with the SPCR in Tajikistan. CIF countries are required to post their Investment Plans at least for fifteen days in their website in advance to submitting it to the CIF governing body for endorsement.

3. CONSULTATION AND PARTICIPATION

A solid information disclosure framework is also a foundation of capacity building for effective participation – only well-informed stakeholders can meaningfully participate in decision-making processes on an equal footing.

Create a forum which caters to the needs and capacities of the stakeholder groups that you identified and analyzed during the mapping

stage. Ensure that consultations are not limited to the investment plan design phase, but continue throughout the life cycle of the investment plan. Document the process and make sure that you provide systematic follow-up reports to all affected groups. Again, establishing early on which forums, networks and means of communication are most effective for the stakeholders in question, will facilitate and inform the success of the consultation process.

A meeting agenda should be distributed ahead of the meeting together with relevant background materials to help stakeholder prepare their input. Be clear about the topics to be discussed, ways in which feedback will be used, etc. In advance of any stakeholder consultation (including at the earliest stage after the very initial discussions between government and MDBs), the government should issue a note setting out any agreed parameters and current thinking regarding the CIF program. This would help those invited prepare for the consultation and, equally important, help manage expectations. If, for example with a CTF program, there is a clear intention to concentrate on large-scale renewable energy generation to meet

national needs, this should be made clear to those consulted at the outset – otherwise the impression is given that the menu is more open than it is. The rationale for the program thinking should be given, in particular showing links to targets spelt out in national development plans, sector strategies or other commitment of government.

The intensity of consultation should be guided by the country and program context, and in particular by the degree of stakeholder interest in the nature of the program and/or investment plan envisaged.

Participation, rather than merely a goal in itself, helps achieve improved development results. By ensuring stakeholders understand and can participate in the decisions, resource allocations, and activities that affect their lives, it ensures attainment of the benefits from this engagement.

Document all meetings and exchanges to foster transparency and facilitate follow-up.

4. PARTNERSHIPS

The more affected stakeholders are by a CIF program impacts, the more important it is to encourage them to participate in matters that have a bearing on them. Participatory assessment and monitoring will be of special importance for investment plans which directly affect livelihoods, for example by having an impact on the management of natural resources or on means of income generation, as well as those involving resettlement.

Involve stakeholders in monitoring the design and outcomes of the investment plan and if there is demand for external experts, possibly due to a legacy of mistrust, consider getting them on board as well, as it will lend legitimacy to your efforts, and will likely lead to greater sustainability of outcomes. In certain instances, capacity-building efforts may also be necessary to enable informed participation in monitoring measures.

The common belief when it comes to participatory processes is that they significantly increase costs. However, international evaluations of the costs and benefits of participation in development projects indicate that the relatively higher costs of participatory projects in their

early phases pay off with fewer delays and greater effectiveness and sustainability in later phases.³

5. REPORTING AND FEEDBACK

Feedback allows the interest parties to see whether and how their interests and concerns were taken into account in the development of an investment plan. Thus, it is very important to periodically report to stakeholders on the concrete steps regarding the implementation of an investment plan and how it integrates their inputs from consultations into the decision-making process. These inputs include possible complaints and grievances. Grievance mechanisms operating on a continuous basis according to clear and transparent procedures are an efficient and effective means of addressing the concerns of individuals and groups that may have been adversely affected by the impacts of an investment plan.

The first step is to consider the ways to elicit the feedback. In some instances, a grievance redress mechanism may be

used as a more general feedback channel – which may make the party on the receiving end more comfortable with the idea of actively using it – or develop specific tools, like citizen report cards, community score cards, etc., to periodically gauge the effectiveness of the interventions as perceived by their beneficiaries. A working feedback system means that there are clear lines of communication established, linking national and local government bodies with stakeholders on the ground. Feedback collection may reveal shortcomings of the initial mapping process and may serve as a rationale for revisiting it at this stage.

Having situated the process of mapping in the general stakeholder engagement framework, the following section expands on the reasons why it is beneficial for the purposes of successfully implementing an investment plan, and the discussion later continues to demonstrate its relevance for CIF programming.

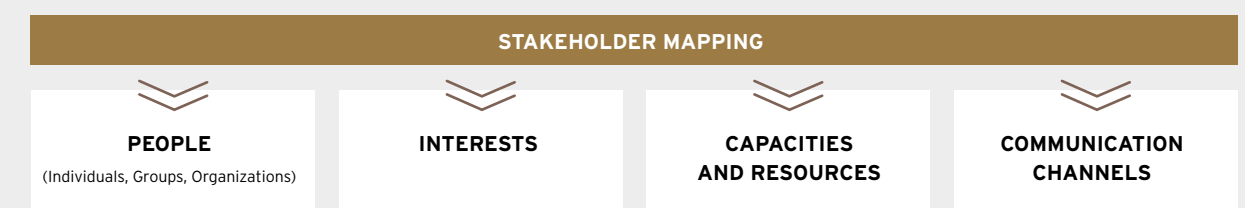
³ OECD DAC Expert Group on Aid Evaluation. 1997. Evaluation of Programs Promoting Participatory Development and Good Governance. Synthesis Report, 22. Paris.

WHAT IS MAPPING?

Stakeholder mapping seeks to identify and describe the interests and relationships of all the stakeholders in a given investment plan. The key to successfully mapping stakeholders is a holistic approach. In this sense, mapping is understood not simply as a process of identifying individuals and groups that will be impacted by or those who may have an influence over investment plan outcomes, but also understanding the intricate

relationships between them, the interests they represent and possibly the agendas they are beholden to, as well as recognizing their varying degrees of importance to the investment plan, their individual levels of capacity and means to engage, as well as their preferred channels and networks of communication. Only from such a comprehensive analysis is it possible to fully understand the stakeholder base and develop an effective engagement strategy.

FIGURE 1
STAKEHOLDER MAPPING



THE BUSINESS CASE FOR MAPPING

The critical importance of stakeholder mapping lies in the fact that the process of understanding stakeholders' needs and interests, is the building block of establishing a working relationship between all the parties involved and a determinant of the effectiveness of the stakeholder engagement framework in eliciting inputs that will inform and improve the objectives and outcomes that an investment plan is intended to deliver.

FIRST IMPRESSIONS AND BUILDING GOODWILL

First impressions go a long way. Laying out a good foundation for effective cooperation is of paramount importance for sustainable outcomes. Initiatives that start off of the wrong foot, will consume much more time and resources than others. Trust once broken is extremely hard to rebuild and disputes are not resolved overnight.

On the other hand, if there is a good and steady platform for communication and cooperation around an investment plan, mistakes, if they do happen, will be easier to rectify, will not generate excessive negative coverage and will not jeopardize the success of the entire Investment.

This is an important point for the CIF, because investment plans often map out programs that clearly will have far-reaching local, as well as global impacts. Climate change finance galvanizes very diverse groups from community to international levels. For this reason, reaching out to interested and affected stakeholders early will help lessen the anxieties and foster open communication and understanding of the objectives of an investment plan.

FOUNDATION OF EFFECTIVE AND MEANINGFUL STAKEHOLDER ENGAGEMENT

Thorough and comprehensive mapping is a critical first step in stakeholder engagement: excluding certain groups or interests may ultimately derail a project; conversely, a broad understanding of the stakeholder environment leads to its success and sustainability of outcomes.

RESOURCE ALLOCATION

Apart from being a critical building block for meaningful stakeholder engagement, developing a deeper understanding of the affected groups and individuals will also help the designers and implementers of the investment plan improve the resource allocation – knowing early on which groups and problems need to be prioritized, will prevent costly and time-consuming tweaks and re-designs.

TIME MANAGEMENT

Assessing early on which stakeholder groups will be relevant and what kind of concerns they are likely to bring to the table will help with drawing up a realistic timeline and help anticipate, as well as prevent, delays. CIF has seen several countries experience delays in endorsing investment plans due to insufficient mapping upfront.

IMPROVING GOVERNANCE PROFILE

Proactive approach to stakeholder engagement may attract investors and secure sources of capital. By demonstrating its commitment to stakeholder engagement, the CIF can attract new financing.

MORE COMPREHENSIVE DUE DILIGENCE

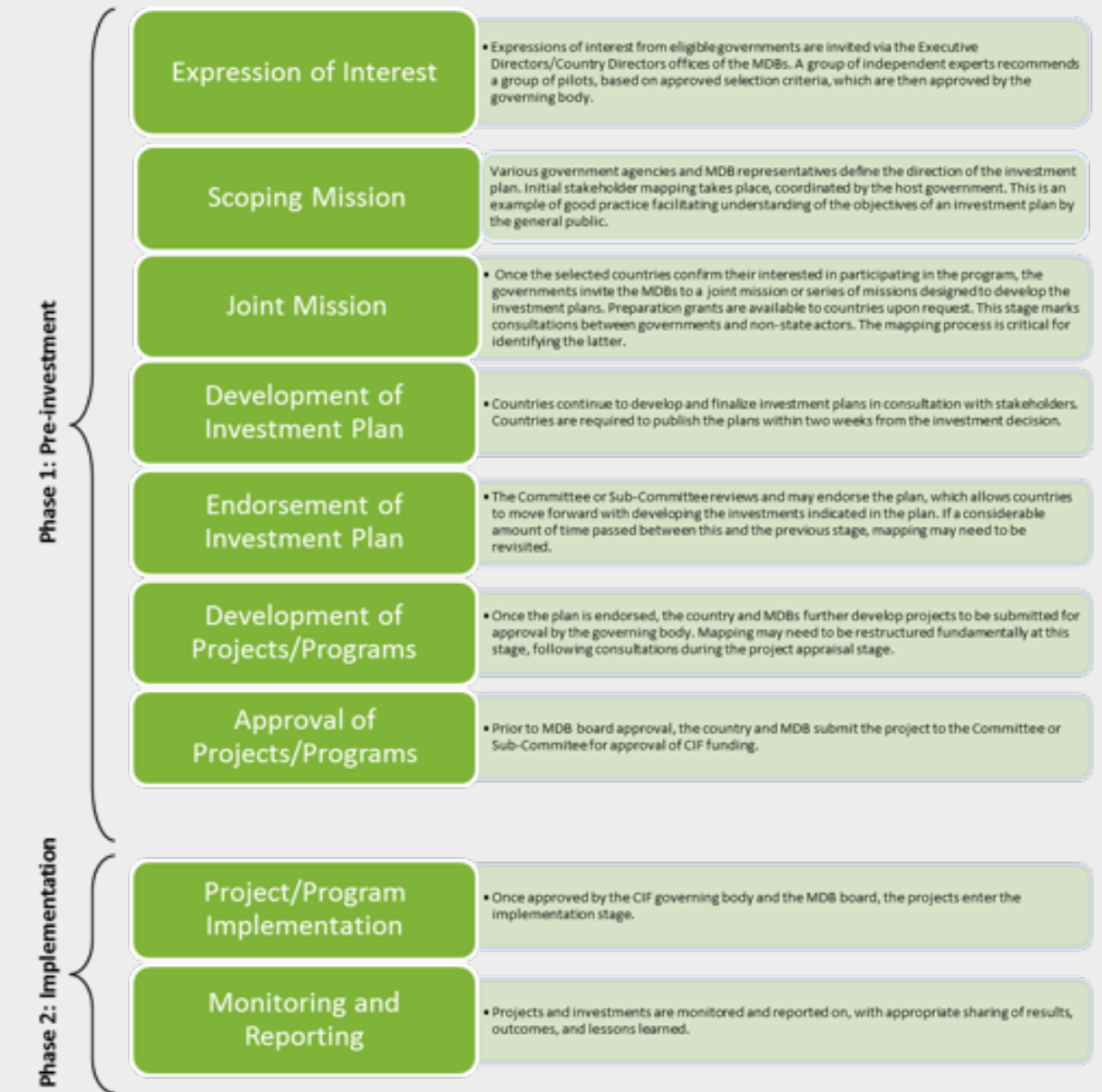
It is critical to be cognizant of risks particular to the environment in which the investment plan will operate. There is a repository of local knowledge – ranging from local government, through civil society organizations, and local communities – that can be drawn upon when trying to anticipate and mitigate them more effectively.

STAKEHOLDER MAPPING WITHIN THE CIF PROGRAMMING PROCESS

For the purposes of this guidance, it is important to place the stakeholder mapping and analysis process within the CIF context,

recognizing where to initiate, revisit and update it. The following graphic represents how the process sits within the broader CIF programming architecture.

FIGURE 2
 THE CIF PROGRAMMING ARCHITECTURE



STEP-BY-STEP PRACTICAL STAKEHOLDER MAPPING GUIDANCE

Having defined the process of stakeholder mapping and analysis and demonstrated its importance for the CIF approach and realizing the objectives of an investment plan, the following is a step-by-step guidance on integrating the stakeholder framework into investment plan design.

1 Define the project's **area** of influence – As a first step, efforts should be into developing an inclusive map of the investment plan impacts, thinking not just of project sites, but also associated locations, such as transport routes, sourcing areas and those subject to experiencing cumulative impacts. While investment plans are not subjected to the scrutiny of formal safeguard processes, there is a strong

argument for conducting rigorous social and environmental impact studies on them, since by the time they are agreed the operational approach and the geographic area of coverage is usually clear. If the investment plan assumes long-term engagement, it is important to think about its development over the course of time and recognize early which stakeholders may be relevant at later stages. Resorting to geospatial imaging might prove helpful at this point. These activities typically take place during the scoping mission stage and are facilitated by the country government.

From the map that has been drawn up, the next step is to start thinking of **interests and influences** that are present in the area and how they interact

with each other – It needs to be borne in mind that social and environmental concerns might extend well beyond physical maps, especially with a topic like climate change, which triggers responses from various groups at various levels.

Performing a thorough analysis of interests at international, regional and local levels, accounting for all conflicting as well as overlapping interests is essential.

An important note to make here is that even at the point of the scoping mission the exact project area may have not been defined yet. In those instances an initial project area should be drawn up based on the obtainable information, and a timeline should be appended for making regular updates to the map as new information becomes available.

2 **Prioritize** stakeholders while preventing **exclusion** – While it is impractical to engage all stakeholders at all stages of the process, a reasonable balance must be struck between **prioritizing** and **including** stakeholders. At the initial stages, it is better to err on the side of inclusion.

To be able to **prioritize** stakeholders, one must begin with a **comprehensive list** of all affected and interested parties, and then **categorize** them according to impact and importance. Hence, inclusion is a necessary building block for prioritization. Existing data and sources can be used to build a

BOX 4 CAMBODIA PPCR - ROBUST MAPPING FRAMEWORK FACILITATES EFFECTIVE ENGAGEMENT STRATEGIES

Before the CIF created roles for civil society stakeholders in the design and implementation of the PPCR, it first rigorously mapped civil society stakeholders at all levels and assessed their existing roles and capacities in the area of climate resilience. Concerted efforts were made to understand the strengths and challenges of Cambodian stakeholders within civil society and establish measures to build their capacity to participate in mainstream climate resilience in development planning, including a scoping study commissioned to an expert consultant. The CSO engagement study made an assessment of capacities of various CSOs at local and national levels, and included a summary assessment of civil society capacity for adaptation, and discussed a mechanism for supporting CSOs in future. It was recognized by the Ministry of Environment that local CSOs were critical in reducing people's vulnerability to the effects of climate change so a more detailed study of their capacity and potential for engagement was commissioned. It was also established that communication with communities on the effects of climate change is routinely hampered by lack of information materials in the local language, which in turn places limitations on informed participation. These findings helped in developing engagement strategies and materials that addressed the needs of all the relevant stakeholders.

TABLE 2
 FACTORS TO CONSIDER FOR WIDER STAKEHOLDER INCLUSION

IT MAY BE HELPFUL TO CONSIDER THE FOLLOWING QUESTIONS TO ENSURE THE WIDEST NUMBER OF POSSIBLE STAKEHOLDERS ARE INCLUDED:

- Who will be affected by negative impacts of the investment plan?
- Who will benefit from the investment plan?
- Who will be responsible for implementing measures to mitigate the negative impacts?
- Whose co-operation, expertise or influence would be helpful to the success of the investment plan?
- Who are the most vulnerable, least visible and voiceless for whom special consultation efforts may have to be made?
- Who supports or opposes the changes that the investment plan will bring?
- Whose opposition could be detrimental to the success of the investment plan?
- Who might have resources to contribute?*

* ICMM (2012). Community Development Toolkit, p. 47

stakeholder database: consultations with local governments, CSOs, faith groups, IP organizations will make the list grow as the original sources start providing additional references. Census data and any other official records available should not be forgotten. Local governments can be given the task of collecting this data on the regional level – alternatively also prioritizing stakeholders given their familiarity with a given area – and passing it on to the central level. The list of vulnerable and less visible stakeholders and consider the reasons for their exclusion. The table below – which addresses critical obstacles to inclusive engagement and ways to remedy them in order to secure the representativeness of the process – will be helpful.

Once the question of exclusion had been addressed, emphasis can shift to prioritization. The following table and graphic will help with prioritizing stakeholders according to impact and influence and developing appropriate and targeted engagement strategies.

TABLE 3
COMMON CHALLENGES TO MEANINGFUL STAKEHOLDER ENGAGEMENT

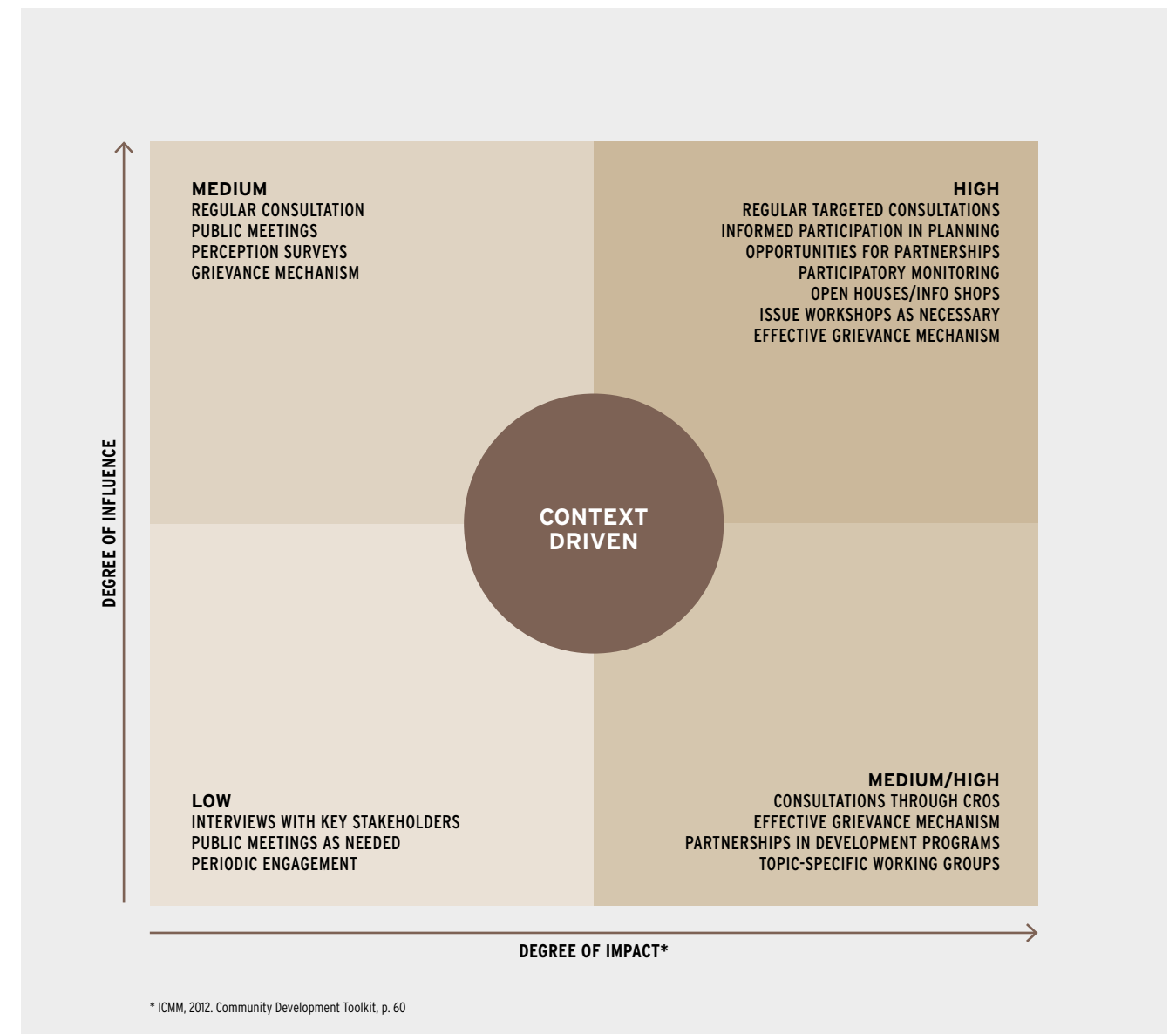
COMMON CHALLENGES TO MEANINGFUL ENGAGEMENT	SOME WAYS TO REMEDY
Cultural and social norms	Ensure engagement is culturally sensitive, create separate focus groups to meet with, e.g. for women
Power dynamics	Separate meeting groups, confidentiality policy, anonymous voting procedures, etc.
Internal divisions	Good mapping process of community relations prior to engagement, clear criteria for distribution of benefits, mediator assistance
Capacity constraints	Training potentially facilitated by government bodies of NGOs, Communicate in plain terms, Provide ample information materials
Resource constraints	Meetings held at times outside of working hours, consider covering transportation/travel costs or consultation per diems
Logistical constraints	Hold meetings at locations that are convenient to reach for majority of stakeholders, communicate information on meetings through multiple channels*

* OECD Stakeholder Engagement Guidance Note

BOX 5
PHILIPPINES CTF - USING THIRD PARTIES TO MAP STAKEHOLDERS

International CSOs acted effectively on behalf of their Philippine CSO partners to help expand consultation and insure that the design of the investment plan was an inclusive process. The World Resources Institute, Overseas Development Institute, and Oxfam America were some of the international CSOs who consulted with the Department of Energy and ADB in February 2012 to help establish a more informed and inclusive stakeholder engagement campaign. With their extensive networks, specialized personnel and targeted resources, international CSOs provided an effective way of addressing capacity constraints at the local level in order to ensure the comprehensiveness of the mapping process.

NAME/GROUP OF STAKEHOLDERS	VIEW OF PROJECT			IMPACT			INFLUENCE		
	POSITIVE	NEUTRAL	NEGATIVE	HIGH	MEDIUM	LOW	HIGH	MEDIUM	LOW
X	•			•					•
Y		•			•				•
Z			•	•			•		



* ICM, 2012. Community Development Toolkit, p. 60

In the context of the CIF, priority should be given in particular to those who:

- Have specialist knowledge of the subject or the geographic area, including research centers, think tanks, service provider NGOs, etc.
- Have potential to contribute to project implementation (private sector or civil society)
- Are community-based or are other organizations that represent or enjoy the trust of those who may be affected by the program (including Indigenous Peoples organizations)
- Can strongly influence, or gauge “the pulse” of, public opinion on issues relating to the CIF program, including responsible advocacy groups.

In countries that are just starting to develop their investment plans, a first step – after preliminary discussions between government ministries and between government and the relevant MDB(s) – could be to expand the scoping process by convening focus groups comprising carefully selected specialists. Small meetings, each with a handful of specialists (perhaps covering private sector, civil society, think tanks/academia and development partners separately), will be useful for identifying measured alternative ideas, significant objections that can be expected to the initial concept, likely sources of support and partnership, and the individual stakeholders with whom close relationship should be built (NB avoiding potential conflict of interest issues in the case of private sector actors and operational NGOs who may later bid for contracts). The Focal Point (or designate) and one or two others from government and from MDBs would also attend. Such small groups allow

BOX 6
**BRAZIL FIP - USING
 TECHNOLOGICAL RESOURCES TO
 BROADEN THE IDENTIFICATION
 AND ANALYSIS PROCESS**

The investment plan’s development in Brazil was aided by an online information sharing function that helped transmit drafts of the plan to stakeholders across civil society, the private sector, and indigenous peoples’ communities; the same online platform was used to gather stakeholder’s views on the investment plan in the form of survey responses. All Brazilian citizens, organized stakeholders, private sector, NGOs and public authorities of Brazil were welcome to participate in the consultation. Notification was disseminated through e-mail and also publicized through press coverage. All contributions received were read and compiled. After systematization, they were processed by the proponents of the Investment Plan activities and taken into consideration during the review of the second draft of the investment plan. This broad identification initiative helped to also ensure the inclusivity of the consultation process: implementing agencies made sure to host information sessions geared specifically towards traditional communities and indigenous peoples when it had been established that they may have been initially underrepresented due to insufficient outreach efforts.

discussions to be more focused and avoid the grand-standing that is often prevalent in public hearings.

③ Think about the **timelines** for engagement, anticipating which stakeholder groups will be impacted at which time. Once stakeholders have been identified, develop realistic timelines for their involvement at each stage of the investment plan implementation, factoring in considerations such as physical location, schedule, access to different media, etc. Remember that for engagement to succeed, it needs to start as early as the scoping mission stage. It is also very likely that once a timeline is developed, it will need to be revised as the investment plan moves into the implementation stage. Critical junctions within that phase include the endorsement of the investment plan and development of programs. Because they are so important to the legitimacy and ownership of the CIF process, these stages will require ample and flexible timelines for consultation and engagement to accommodate any issues unforeseen at the scoping stage.

④ Assess **existing mechanisms and resources** for stakeholder mapping – It is likely that there already some resources available to help with executing the mapping process. Tweak them according to the needs of the project and the strategies you devised, rather than re-invent the wheel, in order to save time and resources. There may be existing databases, grievance logs, environmental and social impact assessment studies which provide more insights into the environment in which a given CIF program will operate, flagging the particularities and risks.

A government body through its continuous engagement with different stakeholders, be it local communities or companies, can be a good facilitator for this process. Using existing structures and channels will also help promote local ownership of the project. One important caveat here is that these institutions and structures need to be trusted by the general public.

The following table lists examples of existing resources that can be helpful in gaining an understanding of the context in which the stakeholders operate.

TABLE 5
DOCUMENT-BASED RESOURCES

PRIMARY SOURCES
• Contracts, licenses, relevant regulation and legislation, policy describing the legal and regulatory regime applicable to the project or activity
• Social or human rights baseline studies/impact assessments commissioned by other parties, or during earlier phases of the projects
• Environmental baselines/impact assessments, which can provide information on air and water quality, water availability and sources, soil conditions, climate, rainfall, and status of flora and fauna
• Health baseline/impact assessments
• Land mapping and other information about the project or activity
• Key indicators collected through geographical information systems maps
• Local community grievances and demand records





SECONDARY SOURCES

- Studies by academics and industry bodies
- Trade union documents
- Country risk analyses
- NGO reportss
- Studies by bilateral and multilateral development institutions
- Studies undertaken by communities, for example indigenous peoples or their representative organizations*

* OECD Guidance Note on Stakeholder Engagement

5 Assign **responsibility** for the mapping process – Make sure that roles in the stakeholder mapping process are clearly assigned and linked to well-defined deliverables. The task is most often shared between the Coordination Unit, focal points, as well as investment plan implementing agencies.

There needs to be a communication channel established between all of these actors and the central government, the ultimate owner of the investment plan. This will help to ensure that the stakeholder mapping process is tracking with the broader objectives of that document. In many instances, there may be a resource and capacity gap between the central and local levels of government in terms of managing the mapping process, so resource and personnel allocation questions need to be addressed at this stage as well. In cases where identification and prioritization of stakeholders seem particularly difficult or if it is likely to reignite pre-existing conflict, independent consultants may need to be engaged in the process to stress integrity and impartiality. This reinforces the argument in favor of creating a roster of experts.

**BOX 7
 CIF STAKEHOLDER MAPPING -
 DIVISION OF RESPONSIBILITIES**

- ▶ National government - high-level coordinators
- ▶ Local government - local-level coordinators
- ▶ MDB representatives - implementing agencies
- ▶ CSO networks - conveners
- ▶ IP umbrella groups - participants
- ▶ Local communities - participants
- ▶ Private sector associations - participants
- ▶ Independent consultants - quality assessment

6 Make sure that the information on stakeholders collected during the mapping process **is available and accessible** to the executers of the investment plan listed in the previous paragraph. In the CIF, for instance, mission reports are posted on the CIF website within 30 days of return. Make sure that all relevant implementing bodies are made aware of the fact and can easily access this information as they move into the implementation phase or when the decision is made to revisit the mapping process.

7 **Revisit** mapping at important junctures in the investment plan life cycle. “Stakeholder identification is a dynamic process – some stakeholders disengage, others join at different stages of project development. There is no such thing as a static list that can be filed away once all stakeholders have been successfully identified.” Sector guidance recommends regular annual updates to stakeholder mapping. In the context of the CIF, it is vital to at least consider it at defining moments in the investment plan cycle, i.e. as it moves from design to implementation. It is important to realize that the relevant stakeholder base is different during investment plan design, project implementation, monitoring and reporting, etc. This point becomes all the more relevant, the longer the time that passes between each of these stages of the CIF programming process – a significant time gap indicates that the mapping likely needs to be updated, as new stakeholders and interests have likely emerged since the last iteration of the process. An effective stakeholder mapping framework should allow for incorporating

new pieces of information and updating existing ones.

In the context of the CIF, CSOs are likely to be concerned about impacts on specific groups such as women, and the local communities where projects are planned. These issues may start surfacing after the investment plan has been drafted. Hence stakeholder mapping and planning consultation strategies is not a one-off need at the initial stage, but an on-going process.

**BOX 8
 TAJIKISTAN PPCR - AMENDING FOR EARLY MISSTEPS**

The stakeholder base relevant for climate resilience efforts in Tajikistan is wide and varied. However, this fact was not reflected in the early project design stages. The first joint mission in 2009 allowed MDBs to meet government agencies and private sector and civil society groups active in the areas of environment, gender empowerment, and energy. Only a few stakeholders were consulted at this early stage, and those were mostly in the capital, Dushanbe. By limiting the number of recognized stakeholders in the early stages of the planning process, implementing agencies risked discrediting the program in the eyes of the Tajik civil society. Local and international NGOs flagged this concern and consultations were subsequently expanded. The Tajik government, together with the multilateral development partners, developed a map of stakeholders to engage across civil society, with tailored strategies to engage them and build their capacities. A reconfigured stakeholder engagement strategy, which relied on increases in qualified personnel and resources, emphasized the variety of the stakeholder base and aligned engagement with their specific needs. Emphasis, was for instance, placed on the priorities of rural women, farmers' associations and other vulnerable groups. The strategy also involved a capacity building component for the implementing agencies and civil society organizations, including workshops on the sustainable management of funding for mitigation programs.

ANNEX 1

Stakeholder engagement policies across multilateral development banks (MDBs)

POLICY FRAMEWORK DEVELOPMENT AND OVERVIEW

Across the World Bank Group (WBG) and its regional counterparts, the issue of stakeholder engagement started to surface in the 1970s. The first policies to address these questions in project design and implementation were crafted in the following decade, among them IBRD's seminal 1982 Indigenous People's Policy, which required free prior and informed consent (FPIC) in projects involving indigenous peoples (IPs). It was also then that the multilateral development banks (MDBs) embarked on a dialogue with civil society organizations. The following decades saw a further push for integrating stakeholder engagement into policy development as well as project execution, with achievements such as the 2012 creation of the Global Partnership for Social Accountability (GPSA), which focuses on capacity-building for civil society organizations to implement social accountability programs in developing countries. By the year 2018, the WBG has committed to integrating beneficiary feedback into 100% of their projects in which these beneficiaries can be identified, and the commitment is being monitored.⁴ Other multilaterals are following on this path of increasingly

⁴ World Bank Annual Report 2015, p. 23

more robust engagement with a growing stakeholder group.

These developments have led to acknowledging and articulating the importance of stakeholder engagement as a critical input to project design and delivery in the environmental and social frameworks of all MDBs. "MDB safeguard policies have evolved in an iterative manner, accompanied by a deliberate effort to harmonize policies, while taking into account regional and stakeholder differences; therefore (...) there are many similarities between the safeguard policies of the World Bank and its MDB counterparts."⁵ For instance, save for a couple of minor differences, the European Bank for Reconstruction and Development (EBRD) adopted the Performance Standards of the International Finance Corporation as its Environmental and Social Policy in 2008. Subsequent revisions to these policies demonstrate a commitment to deepening stakeholder engagement shared by all MDBs – the tendency has been to move beyond managing risks and negative impacts of projects, to building inclusive platforms for stakeholders to be actively involved in shaping their design and execution. For instance, the African Development Bank (AfDB) in its Integrated Safeguards System stresses that its approach goes beyond

⁵ Comparative Review of Multilateral Development Bank Safeguard Systems (2015), p. vi

mitigating risks and adverse impacts towards inclusive growth that will improve people's lives.

A brief overview and comparison of the discussed policies – as they

relate to stakeholder engagement – is presented in the table below, followed by a comparison of policies related to stakeholder engagement and information disclosure, please see Annex 1.

TABLE 1
COMMON THEMES ON STAKEHOLDER ENGAGEMENT IN POLICIES
OF MULTILATERAL DEVELOPMENT BANKS

THEME	POLICY PROVISIONS
Purpose	Stakeholder engagement promotes accountability, transparency and sustainability of outcomes.
Timing	A meaningful stakeholder engagement process needs to be initiated early and continue throughout the project.
Scale	Depth and character of engagement are informed by the risks and impacts of projects.
Flexibility	Stakeholder engagement policy needs to be modified according to subsequent modifications to project design.
Compatibility with local legal framework	Requirements regarding stakeholder engagement enshrined in local laws must be met, but the tendency is to encourage going over and above what is required by country standards.
Vulnerable groups	Special attention and emphasis is dedicated to the most vulnerable and marginalized stakeholder groups, for instance free, prior and informed consent (FPIC) is required whenever indigenous peoples (IPs) are involved.
Maximizing access to information	There is a tendency towards maximizing access to information and a "presumption in favor of disclosure," rather than a positive list of disclosures favored in the past. Compelling reasons - defined in the policies - must be quoted for refusing to release information.
Accessibility and cultural appropriateness	Emphasis placed on the accessibility and cultural appropriateness of information to particular stakeholder groups, including translation into local languages and using favored forms of communication.

TABLE 1
**COMMON THEMES ON STAKEHOLDER ENGAGEMENT IN POLICIES
OF MULTILATERAL DEVELOPMENT BANKS**

	IBRD	IFC	ADB	AFDB	IADB	EBRD
Policy Framework	Safeguards Policies (2016), Access to Information Policy (2010)	Performance Standards (2012), Information Disclosure Policy (2012)	Safeguard Policy Statement (2009),	Integrated Safeguards System Policy Statement & Operational Safeguards (2013), Disclosure and Access to Information Policy (2013)	Environment and Safeguard Compliance Policy (2006), Access to Information Policy (2010)	EBDR Environmental and Social Policy (2014), Public Information Policy (2011)
Accessibility and cultural appropriateness	Policy reiterates “presumption in favor of disclosure”, articulates clear procedures for making information available to the public, including purpose scale and duration of the project, lists exclusions and provides an appeals process in case access to certain information is denied.	The policy - rooted in the principles of accountability and transparency - obliges IFC clients to provide affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.	To facilitate dialogue with affected people and other interested stakeholders, including women, the poor, and other vulnerable groups, information about projects and programs shall be made available to them in a manner, form, and language(s) understandable to them and in an accessible place. ADB shall work closely with the borrower or client to ensure that such information is provided and feedback on the proposed project design is sought, and that a project focal point is designated for regular contact.	The revised policy is anchored on eight major guiding principles: (i) Maximum disclosure; The Bank Group recognizes that its effectiveness in engaging with key stakeholders is crucial to the attainment of its development mandate. Higher accountability based on information sharing will raise the Bank Group’s credibility, development effectiveness and its attractiveness as a partner. (ii) Enhanced Access; (iii) Limited list of exceptions; (iv) Consultative Approach; (v) Pro-active disclosure; (vi) Right to appeal; (vii) Safeguarding the deliberative process; and (viii) Provision for review.	Through implementation of this policy - rooted in the principle of maximizing access to information - the Bank seeks to demonstrate its transparent use of public funds, and by deepening its engagement with stakeholders, to improve the quality of its operations and knowledge and capacity-building activities. The policy is based on the following principles: i) Maximize access to information; ii) Narrow and clear exceptions; iii) Simple and broad access to information (facilitated by the Bank); iv) Explanations of decisions to deny access to information & right to review.	If communities may be affected by adverse environmental or social impacts from the project, the client will provide them with access to the following information: ➤ purpose, nature, scale and duration of the project ➤ risks to stakeholders and proposed mitigation plans ➤ the stakeholder engagement process, if any ➤ the time and venue of any public consultation meetings, and the process by which meetings are notified, and reported ➤ the process by which grievances will be managed. Information will be disclosed in the local language(s), and in a manner that is accessible and culturally appropriate. This will take into account specific needs of groups that may be differentially or disproportionately affected by the project because of their status, or groups with specific information needs.

	IBRD	IFC	ADB	AFDB	IADB	EBRD
Key Provisions on Stakeholder Engagement	<p>One of the goals of the Safeguards revision is to enhance the sustainable development outcomes of projects through ongoing stakeholder engagement based on access to information, consultation, participation, accountability and responsive grievance mechanisms.</p> <p>The Bank will require the Borrower to engage with stakeholders, including communities, groups, or individuals affected by proposed projects, and with other interested parties, through information disclosure, consultation, and informed participation in a manner proportionate to the risks to and impacts on affected communities.</p> <p>Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Engagement is most effective when initiated at an early stage of the project process, and is an integral part of the assessment, management and monitoring of the project's environmental and social risks and impacts.</p>	<p>Stakeholder engagement is an integral component of an Environmental and Social Management System, which every IFC-financed project is required to implement.</p> <p>Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to affected communities.</p> <p>The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and phase of development.</p>	<p>Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.</p> <p>ADB will require borrowers/ clients to engage with communities, groups, or people affected by proposed projects, and with civil society through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities.</p> <p>Consultations should continue throughout project implementation. A grievance redress mechanism to facilitate resolution of the affected people's concerns and grievances should be established. Project design shall allow for stakeholder feedback during implementation.</p>	<p>The borrower or client is responsible for conducting and providing evidence of meaningful consultation (i.e., free, prior and informed) with communities likely to be affected by environmental and social impacts, and with local stakeholders, and also for ensuring broad community support, especially for high-impact projects and for projects affecting indigenous peoples. Consultation is based on stakeholder analysis and is preceded by disclosure of adequate project information and environmental and social information to ensure that participants are fully informed. It begins at an early stage during project preparation and continues as needed. It is conducted in a timely manner in the context of key project preparation steps, in an appropriate language, and in an accessible place.</p> <p>The results of the consultation are adequately reflected in the project design and in the project documentation.</p> <p>For high-impact projects, the affected communities are given the opportunity to participate in key stages of project design and implementation.</p>	<p>The Environment and Safeguards Compliance Policy requires timely and adequate consultation to be carried out in the context of Environmental Impact Assessments (EIAs), with at least two consultations for all high- and medium-impact projects. The Implementation Guidelines describe consultation as a "constructive dialogue between the affected parties" and note that:</p> <p>"Meaningful consultations imply that the parties involved are willing to be influenced in their opinions, activities and plans..." This policy requires consultation with affected parties ("individuals, groups of individuals or communities who may be directly impacted by a Bank-financed operation") and states that other interested parties that have expressed support or concern regarding a project may also be consulted in order to consider a broader range of expertise and perspectives.</p> <p>Implementation Guidelines recommend that consultations be preceded by stakeholder analysis to identify the affected and interested parties.</p>	<p>Stakeholder engagement is a way of improving the environmental and social sustainability of projects. Effective community engagement promotes sound and sustainable environmental and social performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits.</p> <p>Appraisal requires clients to identify stakeholders potentially affected by and/or interested in the projects, disclose sufficient information about the impacts and consult in a meaningful and culturally appropriate manner, in proportion to the potential project impacts and level of concern.</p> <p>Stakeholder engagement will involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.</p> <p>The nature and frequency of stakeholder engagement will be proportionate to the scale of the project and its potential adverse impacts on affected communities, the sensitivity of the environment and level of public interest.</p> <p>Specific personnel will be tasked with implementing stakeholder engagement policy.</p>

