



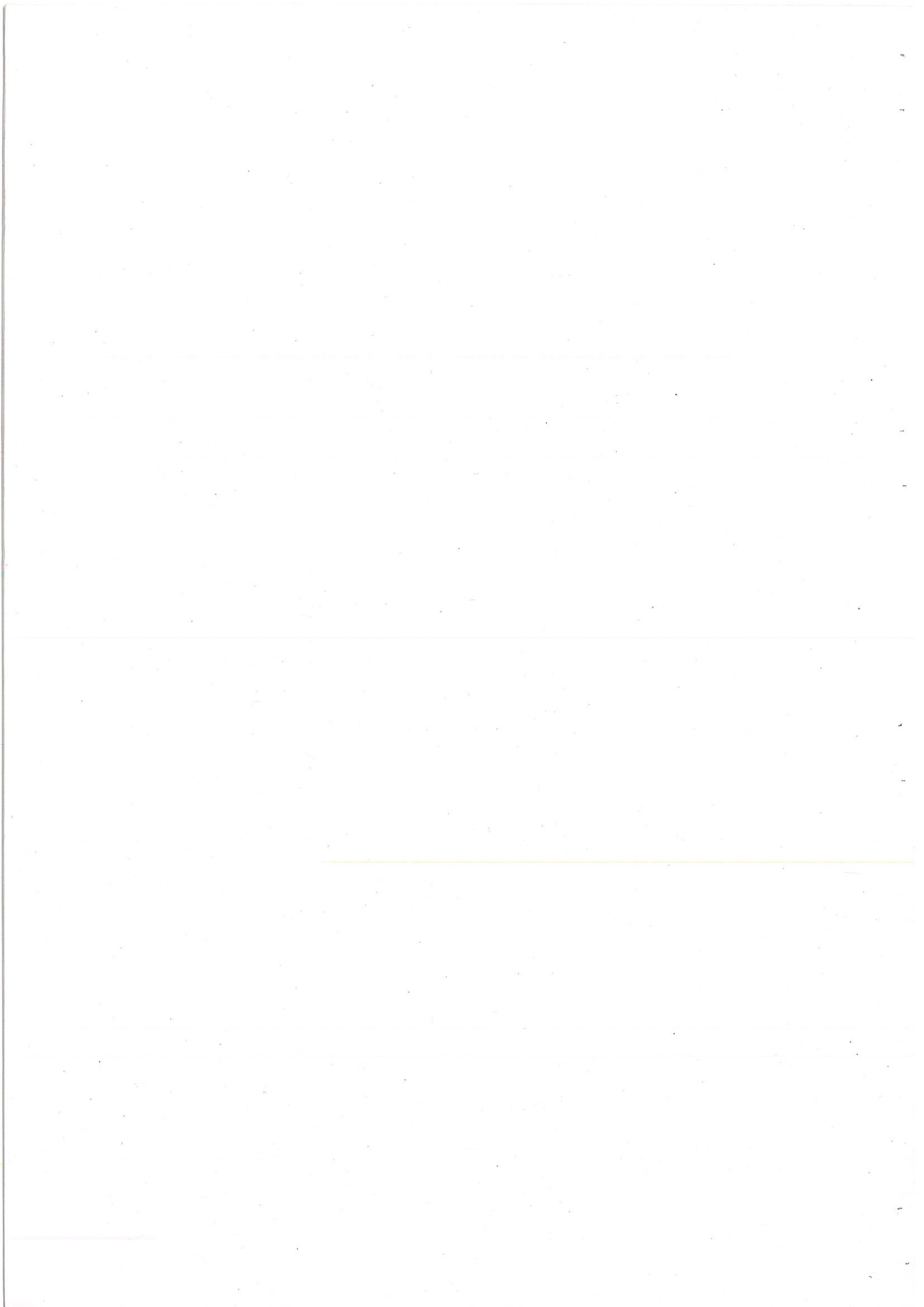
# EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples in Tanzania

16th September 2022

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# EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples

## 1. Introduction

The East Africa Crude Oil Pipeline (EACOP or the Project) is a 1,443 km crude oil export pipeline that will transport crude oil from Kabaale – Hoima in Uganda to the Chongoleani peninsula near Tanga port in Tanzania. EACOP is being developed in accordance with national laws and international standards for responsible business, including the IFC Performance Standards on Environmental and Social Performance and the UN Guiding Principles on Business and Human Rights. In this regard, EACOP has adopted a Human Rights Policy that includes a commitment to ongoing human rights due diligence and to respect the rights of vulnerable people and groups that are recognized as indigenous peoples according to international standards, meaning the Maasai, Akie, Barbaig and Taturu.

This EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples (EACOP Plan) is a key part of the EACOP Project's approach to engaging with and addressing impacts on Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project in a manner that is culturally appropriate and respects national and international human rights standards, including IFC Performance Standard 7 on Indigenous Peoples.

This EACOP Plan has been developed through significant and ongoing due diligence and engagement with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, civil society organizations, national and international experts, and other stakeholders since 2017. It builds upon the EACOP Framework for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples (EACOP Framework) that was agreed and signed by EACOP and the traditional leaders of the Maasai, Akie, Barbaig and Taturu in October 2021.

## 2. Terminology

Based on consultation with national experts and traditional leaders of these communities, EACOP has adopted the terminology of "Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples" to refer to the groups in Tanzania who meet the international criteria for recognition of indigenous peoples.

Based on the Project's due diligence to date, the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project include the Maasai, the Akie and the Datoga (including the Barbaig and Taturu).

### 3. Purpose

The purpose of the EACOP Plan is to describe the commitments of the EACOP Project and their implementation in order to foster respect for the human rights, dignity and culture of Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project.<sup>1</sup>

The EACOP Plan provides more details about the implementation of the EACOP Framework that was signed by EACOP and the traditional leaders of the Maasai, Akie, Taturu and Barbaig. It was developed through various studies and consultation with the traditional leaders and community members with the support of national and international experts and non-governmental organizations (NGOs) who are trusted by these communities.

The EACOP Plan and EACOP Framework are intended to meet the requirements and objectives of IFC Performance Standard 7 on Indigenous Peoples and the principles and good practices for Informed Consultation and Participation (ICP) and Free, Prior and Informed Consent (FPIC).

### 4. EACOP's Commitments

EACOP's commitments to the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples are structured around the following 6 areas that were initially agreed in the EACOP Framework and are detailed in this EACOP Plan.

- (a) supporting informed consultation and participation;
- (b) providing capacity-building;
- (c) providing a culturally-appropriate grievance mechanism;
- (d) addressing potential adverse impacts associated with the development of the EACOP Project;
- (e) promoting development benefits in culturally appropriate ways; and
- (f) engaging with government as appropriate.

#### a. Informed Consultation and Participation

EACOP commits to Informed Consultation and Participation (also known as ICP) with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples including with the relevant traditional leaders, community leaders, Project Affected Communities and households who are impacted by the Project.

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<sup>1</sup> The Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples may be impacted by the construction and operation of the pipeline and associated infrastructure, as well as through the Project's business relationships and value chain. These impacts were identified in the Project's Human Rights Impact Assessment (HRIA), as well as in related studies such as the Environmental and Social Impact Assessment (ESIA) and Resettlement Action Plans (RAPs). These impacts will be reviewed through ongoing consultation with the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, as well as through periodic updates of the HRIA and monitoring of the implementation of the Environmental and Social Management Plans and RAPs.



EACOP recognizes that Informed Consultation and Participation is ongoing and iterative and has developed processes and structured for ongoing engagement at both the level of the traditional leadership and at the community level as outlined below.

#### *Quarterly engagements with Traditional Leaders*

EACOP commits to a quarterly engagement cycle with the traditional leaders of the Maasai, Akie, Barbaig and Taturu. The delegations of tribal leaders for these quarterly engagements will include female leaders or influential women.

These quarterly engagements generally take the form of workshops that may alternate between separate meetings with the traditional leaders of each of the above-noted groups in proximity to their areas and collective meetings with all the above-noted groups together in one location.

Workshops generally take place over 3 days when there is a collective meeting with all the traditional leaders and 2 days when there are separate meetings with the traditional leaders of each group. The workshops will provide an opportunity for separate sessions between the traditional leaders and NGOs to ensure that information provided is well understood and that feedback to EACOP is effectively communicated.

While there is flexibility about the timing of the quarterly engagements, EACOP and the traditional leaders of the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples commit to meeting 4 times a year to implement the EACOP Plan. Additional meetings can be held between the quarterly engagements if necessary.

#### *Community-level engagement*

EACOP also commits to a quarterly engagement cycle with the leaders and community members (including women, youth, and elders' representatives) of the communities where Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples are impacted by the Project, particularly where there are potential impacts on collective lands and/or places of cultural significance.

Community-level engagement is structured around culturally appropriate engagement platforms that are recommended by traditional and community leaders and that are effective for dissemination of information and dialogue at the community level. These platforms also support grievance management and resolution as described in section 4(c) below.

While the community-level engagement platforms are agreed for each community, there are commonalities between the platforms used by each Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples as outlined in Table 1 below.



Table 1: Overview of Community Engagement Platforms

Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples	Culturally Appropriate Engagement Platforms
Akie	Community Committee; Elders Committee
Maasai	Traditional Leaders Committee; Women's Council
Barabaig	Council of Elders
Taturu	Council of Elders

Community-level engagement also includes separate smaller group meetings and focus groups discussions with elders, women and young girls, youth and other relevant sub-groups of these communities. EACOP works with the communities and NGOs to understand their preferences about how to engage with these groups in a culturally appropriate manner.

The details of the community engagement platforms and modalities for engagement with each community are specified in the Community Profiles in Appendix A of this EACOP Plan.

#### *NGO and Expert Support for Ongoing Engagement*

Ongoing engagement is supported by non-governmental organizations (NGOs) that are trusted by the traditional leaders and communities and who have expertise on the implementation of indigenous peoples rights and development in Tanzania. This includes: Pastoralist Indigenous Non-Governmental Forum (PINGOs Forum), Parakuiyo Pastoralists Indigenous Community Development Organisation (PAICODEO) and Ujaama Community Resources Team (UCRT).

As outlined in Section 5 below, EACOP has developed a Memorandum of Understanding (MoU) with these NGOs to define the modalities for their support under the EACOP Framework and EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. A copy of the MoU is included in Appendix B of this EACOP Plan.

#### *Engagement Planning*

The agenda for the quarterly engagement workshops will be based on feedback from prior workshops. This includes identification of topics of interest and potential guest speakers (e.g. EACOP staff, experts involved in studies relevant to the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, etc.) in order to provide information and capacity-building that is responsive to the needs and requests of the traditional leaders and communities. Consideration shall be given to including topics of interest and relevance to the female traditional leaders and influential women who attend the workshops.

The agenda and location(s) of the subsequent engagement meetings will be discussed with the traditional leaders and NGOs as part of the closing of each quarterly workshops. Prior notice and information will be provided to the traditional leaders, community leaders and relevant NGOs about the engagement schedule and purpose of the meetings.

### *Content of Engagement*

The engagement meetings with traditional leaders, community leaders and community members generally include the following content:

- Engagement includes updates on EACOP activities in general and specific to the community locations.
- Engagement includes updates on environmental, social and other studies that are relevant to the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples.
- Engagement includes updates on local employment and contracting to ensure communities have information to enable them to access any opportunities.
- Engagement includes updates on the overall implementation of the EACOP Plan and responses to any requests for information from prior meetings and engagements.

### *Translation*

Key documents related to the Project, the EACOP Framework and EACOP Plan are translated into Swahili. As the national language of Tanzania, it has been agreed that this is the priority language for translation of EACOP documents. Further translation into Maa and Barabaig will be done at the request of the communities. Best efforts will be undertaken to also translate key documents into Akie.<sup>2</sup>

Options for using audio-visual forms of translation are considered to support effective information-sharing and communications with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples.

Trusted translators are provided for the meetings so that the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples can engage comfortably with the Project in their languages.

### *Government Representatives*

The Government's District Focal Persons (DFPs) for the Project and other government representatives may be involved in the engagement with traditional leaders and community leaders of Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples in order to ensure that they are informed of the implementation of the EACOP Plan and can support its implementation as appropriate. Further information about engagement with government is provided in section 4(f) below.

### *Freedom from Intimidation*

Community-level engagement is free from any form of intimidation that may act as an obstacle to informed participation of the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. EACOP will immediately respond to and address—with support of the NGOs and external advisors or experts as necessary—any allegations of intimidation or retaliation related to the EACOP Project.

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<sup>2</sup> There are very few people who still speak the Akie language, even amongst the Akie themselves. Therefore, it may be challenging to find suitable translators and may be necessary to use alternative forms of audio-visual translation for the Akie language.



## b. Capacity-building

The Project supports capacity-building for the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project to allow them to engage with the Project on an informed and equitable basis. The model of ongoing Informed Consultation and Participation that includes 2 or 3 day workshops on a quarterly basis is designed to provide regular opportunities for capacity-building.

Priorities for capacity-building are identified in consultation with the traditional leadership and include support for translation and simplification of materials about the Project to support their role in informing and consulting at the community-level. In this regard, EACOP translates the key documents related to the Project, the EACOP Framework and EACOP Plan into Swahili (and other languages upon request) and provides trusted translators to support this capacity-building.

EACOP also invites guest speakers (e.g. EACOP staff, experts involved in studies relevant to the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, etc.) to support capacity-building about the Project and its procedures for managing and mitigating environmental, social and human rights impacts. Ongoing dialogue with the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples and the NGOs during the quarterly engagements are used to support identification of topics of mutual interest for subsequent capacity-building. As noted above, consideration shall be given to including topics of interest and relevance to the female traditional leaders and influential women who attend the workshops.

Capacity-building materials (e.g. EACOP communications materials or presentations from guest speakers) are provided to the traditional leaders to support their dissemination at the community level.

Traditional leaders also have requested support for transportation to help them provide information and gather feedback at the community level. The Project provides support for the participation of traditional leaders from all the affected communities at the quarterly workshops to facilitate the sharing of information at the community level. Additional support for traditional leaders to engage at the community level will be considered by EACOP on a case-by-case basis and may be facilitated or supported by the NGOs or EACOP Community Relations Coordinators.

## c. Grievance Management Procedure

### *EACOP Grievance Management Procedure*

The Project has developed a Grievance Management Procedure for EACOP Tanzania<sup>3</sup> to support the proactive management and resolution of grievances with community members.

To ensure that the Grievance Management Procedure is culturally appropriate, the Project has consulted with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples and has updated the grievance procedure accordingly (see text box below).

The community engagement platforms that support Informed Consultation and Participation (as described in section 4(a) above and in the Community Profiles in Appendix A of this EACOP Plan) are empowered to receive Project-related grievances from community members, to report these to the

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<sup>3</sup> EACOP Grievance Management Procedure (Tanzania), Reference Number L2-ST-LSO-TZ-0136.



Project, and to support proactive resolution through dialogue, mediation and customary mechanisms as appropriate.

Table 2: Excerpt from EACOP Community Grievance Management Procedure

## 2.6. Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples

EACOP project impacts directly and indirectly on communities of Vulnerable Ethnic Groups Communities Self-Identifying as Indigenous People named Maasai, Akie and Datoga (Barbaig and Taturu). They are found in Handeni and Kilindi districts in Tanga, Kiteto, Simanjiro and Hanang districts in Manyara, Kondoa Town in Dodoma and Igunga district in Tabora region. These groups require special engagement and attention due to their distinct lifestyle, greater vulnerability and remote, natural resource dependent locations.

EACOP treats equally all Project Affected People in respect of their uniqueness and cultural differences. With respect to Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, the EACOP Grievance Management procedure includes representatives of Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, their community engagement committees (baraza) and traditional leaders where necessary to support the management of Grievances from their communities. They are provided with numbers to call when there is a Grievance in the area and these leaders can provide translation support. The involvement of these community representatives is necessary as most individuals from these groups prefer to interact with or in the presence of someone they trust from their own ethnic groups.

In this Grievance Management Procedure, EACOP has included commitments to Grievance management from the EACOP Framework for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples (EACOP Framework) that was developed and agreed through a process of consultation with the traditional leaders, community members and NGOs representing the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. The EACOP Framework specifies the following:

- To ensure that the Project's Grievance procedure is culturally appropriate, the Project has consulted with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples and will update the Grievance procedure accordingly.
- The community engagement platforms (as agreed for the purposes informed consultation and participation in sub-section (a) of the EACOP Framework) will also be empowered to receive Project-related Grievances from community members, to report these to EACOP, and to support proactive resolution through dialogue, mediation and customary mechanisms as appropriate.
- Joint efforts by the Project, NGOs and community engagement platforms to promote awareness about the community-level Grievance procedure will consider the low levels of literacy of some community members, the need to make the Grievance procedure simple and accessible, and to incorporate customary mechanisms as appropriate.
- Ongoing reporting and consultation on the effectiveness of the community-level Grievance procedures will be undertaken during the quarterly engagement with the traditional and community leadership.
- EACOP and the traditional leadership have agreed to nominate a representative from the NGOs providing support to the traditional leaders on matters related to EACOP to assist in advising upon and resolving any issues arising from the implementation of the EACOP Framework for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, the EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples or FPIC Agreements (where required).



In case of Grievances from Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, the following is considered:

- The use of oral communication with a translator may be necessary as community members from these groups may not understand Swahili or may prefer to use their local language.
- The complainant may be accompanied by a representative from their group.
- The community secretary or EACOP field team can assist the complainant and community representatives in filling Grievance forms during Grievance registration or close out.

Joint efforts by EACOP, NGOs, traditional leaders and the community engagement platforms to promote awareness about the Community Grievance Management Procedure will take into account the low levels of literacy of some community members, the need to make the grievance procedure simple and accessible, and to incorporate customary mechanisms as appropriate. The Project has developed and translated information materials about the Community Grievance Management Procedure to help promote awareness at the community level. These materials are included in Appendix B of this EACOP Plan.

Ongoing reporting and consultation on the effectiveness of the community-level grievance procedures will be undertaken during the quarterly engagement with the tribal and community leadership.

#### *NGO Support for Grievance Resolution*

The Project and the traditional leaders have agreed to nominate a representative of PINGOs Forum to assist in advising upon and resolving any issues arising from the implementation of the EACOP Plan.

The role of the PINGOs Forum representative will be determined on a case-by-case basis and may include:

- Providing advice on culturally appropriate grievance resolution techniques and rights-compatible outcomes for community-level grievances that have been escalated through the Community Grievance Management Procedure.
- Facilitating dialogue or mediation between EACOP and the traditional leaders or community leaders regarding grievances or issues arising from the implementation of the EACOP Plan.
- Recommending trusted third parties or experts to support joint fact-finding and other grievance resolution techniques to help resolve grievances or issues arising from the implementation of the EACOP Plan.

PINGOs Forum will inform EACOP if there is a real or perceived conflict of interest between PINGOs Forum's role in implementing the EACOP Plan and its role in facilitating the resolution of a particular grievance. In such instances, PINGOs Forum may recommend that one of the other NGOs or experts involved in supporting the implementation of the EACOP Plan support the resolution of the grievance in question.

#### d. Addressing Potential Impacts

The Project commits to managing adverse impacts on all affected individuals and communities, including Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. This includes:

- Implementing the environmental, social and human rights mitigation measures developed for the entire Project through the Environmental and Social Impact Assessment (ESIA), Human Rights Impact Assessment (HRIA) and Resettlement Action Plans (RAPs). This includes livelihood restoration measures for directly affected Project Affected People (PAPs), including Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples.
- Prioritizing existing mitigation measures or developing additional mitigation measures required to prevent or mitigate adverse impacts on Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. These are developed in consultation with the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples and their representatives.
- These priority or additional impact mitigation measures have been identified during the development of the Community Profiles and are included in Appendix A of this EACOP Plan.

#### *Priority impacts and mitigation measures*

The following table provides a summary of the priority impacts that have been identified through the Project's prior due diligence and engagement with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, including the preparation of the Community Profiles and additional consultations for the disclosure of the Project's Environmental and Social Impact Assessment. The identification of these priorities will be used to support ongoing information, consultation and capacity-building with communities about the Project's management plans and mitigation measures. This will also be used to guide the Project's monitoring of contractor and sub-contractor activities during the construction of the pipeline.

Table C: Priority Impacts and Mitigation Measures

Categories of impacts	Priority Impacts	Management Plans and Mitigation Measures
Cultural heritage impacts	<ul style="list-style-type: none"> <li>• Potential impacts on sacred trees used for cultural or spiritual ceremonies and public meetings (e.g. Engigwana for the Maasai).</li> <li>• Potential impacts on other traditional gathering places.</li> <li>• Potential impacts on graves or other sacred sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation, mapping and analysis of sacred sites for each community.</li> <li>• A FPIC Agreement has been concluded with the Akie in relation to an impact on a site of cultural significance, and other FPIC Agreements will be concluded if required for previously undisclosed cultural heritage sites.</li> <li>• Support for relocation of sacred sites and ritual ceremonies<sup>4</sup>.</li> <li>• Consultation regarding the additional protective measures to be implemented by Contractors during</li> </ul>

<sup>4</sup> References: Cultural Heritage Management Plan and CCPs; Ethnographic Study.



Categories of impacts	Priority Impacts	Management Plans and Mitigation Measures
		<p>construction for all cultural heritage sites at close proximity to the construction zone.</p> <ul style="list-style-type: none"> <li>Review and propose options for avoidance of sacred sites whenever technically feasible.</li> </ul>
Land-related impacts	<ul style="list-style-type: none"> <li>Potential impacts on traditional land used for grazing.</li> <li>Potential impacts on village land used by community members.</li> <li>Potential impacts on individual lands and assets, including crops and trees.</li> <li>Potential impacts on water resources used by community members and for livestock.</li> <li>Potential impacts on natural resources in forests (e.g., used for making honey or for traditional medicine or foods).</li> <li>Potential impacts on houses and other structures.</li> <li>Potential impacts on livestock and people crossings (including seasonal crossing points and locations).</li> <li>Potential for perception of unfairness of compensation for collective resources or entitles that legally go to the village level rather than the hamlet level where the Vulnerable Ethnic Groups reside.</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process and livelihood restoration in compliance with Tanzanian law and IFC PS5.</li> <li>Fair and transparent compensation payment which included both spouses.</li> <li>Livelihood restoration programme is designed and adapted to the specific lifestyle and livelihoods of the community members.</li> <li>Replacement houses for eligible households.</li> <li>In kind replacement of water sources for eligible households.</li> <li>Participatory identification of crossing sites and provision of temporary crossings with flagmen during construction<sup>5</sup>.</li> </ul>
Other community impacts and concerns	<ul style="list-style-type: none"> <li>Potential impacts on community health, safety and security because of interactions with workers—with concern about potential health impacts on women related to in-migration and/or the presence of workers during the construction phase.</li> <li>Potential impacts related to road traffic accidents.</li> <li>Potential for community members (particularly youth and women) to have challenges to access local employment opportunities in terms of timely</li> </ul>	<ul style="list-style-type: none"> <li>Liaise with local government to secure baseline health status in affected villages.</li> <li>Plan health awareness sessions for community members.</li> <li>Organize and conduct road and construction safety awareness campaigns Provision of culturally appropriate signage.</li> <li>Specific measures for access to local employment opportunities (see section 4(e) below)<sup>6</sup>.</li> </ul>

<sup>5</sup> References: Resettlement Action Plans and CCPs, including Livelihood Restoration Plan and Vulnerable Peoples' Plans; Natural Resource Management Plan and CCPs; Biodiversity Management Plan and CCPs; Pollution Prevention Plan and CCPs; Community Health, Safety and Security Management Plan and CCPs.

<sup>6</sup> References: EACOP Code of Conduct; Community Health, Safety and Security Management Plan and CCPs; Transport and Road Safety Management Plan and CCPs; Procurement and Supply Chain Management Plan and CCPs; Labour Management Plan and CCPs; Project-Induced In-Migration Plan and CCPs; Stakeholder Engagement Plan and CCPs.

Categories of impacts	Priority Impacts	Management Plans and Mitigation Measures
	awareness of the opportunities and having the requisite skills.	
Impacts on women	<ul style="list-style-type: none"> <li>• Potential impacts on women when they are not permitted to own land, livestock or other property—which could affect their entitlement to compensation or other benefits related to potential impacts of the project.</li> <li>• Potential impacts on women when they are not permitted to speak in community meetings or contribute to decision-making.</li> <li>• Potential for misuse of compensation by men.</li> <li>• Potential difficulties for women to access Project benefits such as employment or development projects.</li> </ul>	<ul style="list-style-type: none"> <li>• Awareness-raising to the community about women’s rights to own land, cattle and other property.</li> <li>• Organization of separate meetings with women during information and consultation activities.</li> <li>• Use of influential and trusted women to provide information about job opportunities<sup>7</sup>.</li> </ul>

#### *Free, Prior and Informed Consent (FPIC) Agreements*

While the purpose of the EACOP Plan is to support FPIC principles for all the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, EACOP recognizes that additional FPIC Agreements may be required for certain impacts related to on specific communities in accordance with IFC Performance Standard 7 on Indigenous Peoples (i.e. impacts on or relocation from land and natural resources subject to traditional ownership or customary use and/or impacts on critical cultural heritage or sacred sites.). Those circumstances have been identified through expert studies and ongoing consultation with traditional and community leaders. The required FPIC Agreement(s) are included in Appendix A of this EACOP Plan along with the relevant Community Profile(s).

#### *e. Project Benefits*

The Project is committed to promoting access to Project benefits for the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project in a manner that is consistent with its role as a private sector actor and the resources available for development and social investment initiatives for the overall Project.

#### *Access to Local Employment Opportunities*

Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples have expressed interest in local employment opportunities for their community members. They have also highlighted some of the obstacles that they face in accessing employment opportunities due to geographic distance, language barriers, levels of literacy and formal education, and other factors.

<sup>7</sup> References: Ethnographic Study, Resettlement Action Plans and CCPs, including Livelihood Restoration Plan and Vulnerable Peoples’ Plan, Stakeholder Engagement Plan and CCPs and Labour Management Plan and CCPs.



EACOP commits to facilitate an ongoing dialogue between the Project's Local Content team, the traditional leaders, community leaders and NGOs with a view to developing strategies or initiatives to overcome the barriers to employment and maximize access to local employment opportunities for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples.

EACOP also commits to engage proactively with the contractors and sub-contractors who will be active in and around the communities with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples to support their awareness of the importance of providing local employment opportunities to members of these communities in a non-discriminatory and proactive manner.

EACOP's commitments to provide access to local employment opportunities include:

- Regular participation of members of the Local Content team in the quarterly workshops with traditional leaders to provide updates on forthcoming local employment opportunities and lessons learned from local recruitment efforts in other areas.
- Organization of community meetings for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples to explain forthcoming local employment opportunities and recruitment procedures prior to the commencement of construction activities in their area.
- Inviting contractors who will be offering local employment opportunities to participate in the quarterly workshops with traditional leaders and community meetings prior to the commence of construction activities in their areas in order to facilitate information-sharing about forthcoming recruitment procedures.
- Providing timely information about all relevant employment opportunities to communities by (a) posting hard copies of job notices in an agreed location that is accessible to community members and (b) notifying community leaders and members of the community engagement platforms (as described in section 4(a) above. Further information about how relevant employment opportunities will be communicated at the community level is included in the Community Profiles in Appendix A of the EACOP Plan.

#### *Social Investment Programme*

As part of its commitment to promoting access to development benefits, EACOP will develop a Social Investment Programme that is specifically targeted to Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples. Insofar as possible, the Social Investment Programme is intended to promote development benefits for the affected communities as a whole and should be complementary to local employment opportunities and other initiatives such as livelihood restoration programmes that benefit individuals or households within the affected communities.

EACOP's commitments to develop a Social Investment Programme include:

- Selecting a suitably experienced organization (company or NGO) to design and implement the Social Investment Programme for the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples that are part of the EACOP Plan.



- The design of the Social Investment Programme will focus on support to the traditional livelihoods of Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples including but not limited to land management, livestock health and management, and women's specific needs.<sup>8</sup>
- The design of the Social Investment Programme will be based on an integrated approach that includes conservation requirements and sustainability considerations and will be undertaken in a participatory manner with the input of the traditional leaders and community members, including women and youth. This includes the input that has already been compiled from traditional leaders and community members through the development of the Community Profiles in Appendix A of the EACOP Plan.
- Upon completion of the design phase, a detailed implementation plan for the Social Investment Programme will be presented and consulted with the traditional leaders and community members at the following quarterly workshop and community meetings. Once validated, it will be annexed to the EACOP Plan.
- The implementation plan will include a specific monitoring and evaluation plan for the Social Investment Programme that supplements the monitoring and evaluation framework in section 6 below.
- The implementation plan will also include resourcing requirements, including the direct financial and in-kind contributions of EACOP, as well as a strategy to leverage other sources of governmental, private sector or non-governmental funding to maximize the development benefits of the Social Investment Programme.

#### f. Engagement with Government

EACOP commits to use its leverage with business partners and third parties, including government representatives, to address potential adverse impacts on, and to promote access to development benefits for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project.

In particular, EACOP supports the inclusion of Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples in discussions with local government officials about the Project's impacts on the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, particularly in areas where these groups are in a minority situation. These areas and the modalities for supporting Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples is specified in the Community Profiles in Appendix A of this EACOP Plan.

Many of the key priorities for impact mitigation and Project benefits are aligned with Tanzanian law and government priorities. In particular, the land demarcation and planning process under Tanzanian law is a priority to reduce land conflicts and to delineate areas of village land for grazing and traditional or cultural activities.

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<sup>8</sup> EACOP has completed an Expression of Interest process on August 24, 2022 and has commenced the next step in the selection process through a Call for Proposals. If a suitable organization is identified, the design of the Social Investment Programme should begin in the fourth quarter of 2022.

Furthermore, priorities for engagement with government about impact management and/or promotion of Project benefits at the community level are outlined in the Community Profiles in Appendix A of this EACOP Plan. Furthermore, the design of the Social Investment Programme with identify potential synergies with other development projects implemented by government (and other organizations).

In terms of the ongoing engagement with government about the implementation of the EACOP Plan, the EACOP District Focal Persons (DFPs) are invited to the quarterly workshops with traditional leaders and other community-level meetings as appropriate. Furthermore, other government representatives at the village, ward and district levels may be invited to meetings or workshops as necessary to ensure their awareness of and encourage their support for the implementation of the EACOP Plan.

## 5. Support for Implementation of the EACOP Plan

### a. EACOP support

EACOP will provide the necessary support for the implementation of the activities agreed in this EACOP Plan, including the time of its staff and experts, logistical and financial support. This includes the ongoing support of a Tanzanian indigenous peoples' rights advisor and an international human rights advisor.

### b. NGO support

EACOP has developed a separate Memorandum of Understanding (MoU) with PINGOs Forum, PAICODEO and UCRT to support the implementation of the EACOP Framework and EACOP Plan. Further to this MoU, EACOP signed contracts with each of these NGOs and has a process in place to develop quarterly workplans to support the implementation of the EACOP Plan.

### c. Traditional Leaders' Support

The traditional leaders of the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples will support the implementation of the EACOP Plan through their ongoing participation in the quarterly engagement workshops and support for the Project's ongoing efforts to inform and consult with community leaders and community members.

## 6. Monitoring and Evaluation

To support the effective implementation and continuous improvement of the EACOP Plan, EACOP commits to the following participatory monitoring and evaluation activities with traditional leaders and community members. The NGOs and external advisors who support the EACOP Plan, along with EACOP's Community Relations Coordinators and internal experts, will also participate ongoing monitoring and evaluation activities.

### a. Participatory Monitoring

EACOP commits to participatory monitoring and dialogue with traditional leaders and community members about the implementation of the EACOP Plan based on the following indicators. These indicators will form the basis of ongoing updates and feedback at the quarterly workshops with traditional leaders and in community meetings. The indicators can be modified or supplemented over time based on feedback from the ongoing dialogue with traditional leaders and community members.



Sections of the EACOP Plan	Indicators
Informed consultation and participation	<ul style="list-style-type: none"> <li>• EACOP organizes 4 workshops per year with traditional leaders.</li> <li>• EACOP organizes community-level meetings, including meetings with women and youth, in at least 75% of the communities each month and in 100% of the communities at least each quarter.</li> </ul>
Capacity-building	<ul style="list-style-type: none"> <li>• A guest speaker provides capacity-building inputs at each of the workshops with traditional leaders.</li> <li>• At least one capacity building session per year focuses on a topic of relevance to women.</li> <li>• 100% of key documents for traditional leaders' workshops and community meetings translated into Swahili (and other indigenous languages upon request).</li> <li>• 100% of participants supported to attend quarterly workshops.</li> </ul>
Grievance mechanisms	<ul style="list-style-type: none"> <li>• One awareness-raising session per year conducted in each community about the Project's Community Grievance Management Procedure.</li> <li>• A representative of PINGOs Forum is included in the grievance management process for all grievances related to the implementation of the EACOP Plan.</li> </ul>
Addressing impacts	<ul style="list-style-type: none"> <li>• All communities are consulted in the month prior to the start of construction in their area about priority impacts and informed about the Project's mitigation and management plans to address those impacts.</li> <li>• Specific meetings are held with women and youth in each community to discuss potential impacts and mitigations of particular relevance or concern to them during the month prior to the start of construction in their area.</li> <li>• All relevant contractors and sub-contractors are informed of priority impacts and agreed mitigation and management measures 1-4 weeks before mobilization.</li> </ul>
Promoting development benefits	<ul style="list-style-type: none"> <li>• EACOP meets with each community at least 4 weeks prior to commencement of construction activities in their area to inform community members of local employment opportunities and recruitment procedures.</li> <li>• 100% of local employment opportunities are communicated to the communities in hard copies and through the designated community engagement platforms prior to the start of recruitment.</li> <li>• The social investment programme is designed in consultation with traditional leaders and community members and results in a detailed implementation plan.</li> <li>• Supplementary indicators for monitoring and evaluation of the social investment programme are included in the detailed implementation plan.</li> </ul>
Engagement with government	<ul style="list-style-type: none"> <li>• District Focal Persons are invited to workshops with traditional leaders.</li> </ul>

### b. Annual Evaluation

An annual participatory evaluation of the implementation of the EACOP Plan will be conducted, beginning one year after the signature of the EACOP Plan. The main mechanism for the participatory evaluation will be through a community survey that will be designed and implemented with the support of the NGOs and external advisors and experts.

The community survey will be presented to the traditional leaders for feedback at the quarterly workshop in the second quarter of 2023 and will be administered at the community level thereafter. The results of the community survey will be presented and discussed with the traditional leaders at the quarterly workshop in the third quarter of 2023 and then to community leaders and members at the next meeting following the completion of the annual survey.

Further to the completion of the annual evaluation activity, the EACOP Plan may be reviewed and updated as necessary to improve its implementation. Any updated version of the EACOP Plan will be signed by EACOP management and the traditional leaders of the Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples.



## Appendix A: Community Profiles

The Community Profiles for the communities with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the EACOP Project are included on the following pages.

## Appendix B: Reference Documents

The following documents are annexed to the EACOP Plan.

1. EACOP Human Rights Policy
2. Grievance Mechanism Flowchart
3. MOU with NGOs for Implementation of EACOP Framework

Additional reference documents can be annexed to the EACOP Plan further to the annual evaluation and revision process outlined in section 6 of the EACOP Plan.



This EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples (EACOP Plan) is a key part of the EACOP Project's approach to engaging with and addressing impacts on Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples who are impacted by the Project in a manner that is culturally appropriate and respects national and international human rights standards, including IFC Performance Standard 7 on Indigenous Peoples.

This EACOP Plan has been developed through significant and ongoing due diligence and engagement with Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples, civil society organizations, national and international experts, and other stakeholders since 2017. It builds upon the EACOP Framework for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples (EACOP Framework) that was agreed and signed by EACOP and the traditional leaders of the Maasai, Akie, Barbaig and Taturu in October 2021.

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