

DEVELOPMENT OF THE DISPUTE RESOLUTION PROCESS THROUGH CULTURALLY APPROPRIATE ENGAGEMENT

Evidence record for FSC-STD-NAM Indicators 1.6.1, 2.6.1 and 4.6.1

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Prepared by	Environmental Compliance Consultancy (ECC), Group Scheme Manager
Reviewed by	
Approved by	[NamPower SHEW Manager] and [ECC Principal]
Review	Annually, or when GCP 01 is revised

NamPower FSC Group Scheme for the Otjikoto Biomass Power Station (Project 97-626)

Client: NamPower (Pty) Ltd, Group Scheme Owner

Group Scheme Manager: Environmental Compliance Consultancy (ECC)

Executive summary

FSC-STD-NAM V1-0 requires that the dispute resolution process for the Group Scheme is developed through culturally appropriate engagement with affected stakeholders (Indicator 1.6.1), with workers (Indicator 2.6.1) and with directly affected local communities (Indicator 4.6.1). The auditor tests this by asking how the process was developed and whether affected parties were engaged, not only whether a written procedure exists.

This record sets out that evidence. The Group Scheme dispute resolution process is the Grievance and Complaints Procedure GCP 01, which sits on the Otjikoto Biomass Power Project Stakeholder Grievance Mechanism (BIO-GRM v0.1). Both were shaped by the public participation process of the Environmental and Social Impact Assessment for the Biomass Power Project, and by the ongoing stakeholder engagement carried under the Environmental Management Plan (EMP), including Steering Committee meetings, landowner consultation and the project stakeholder register.

One evidence gap remains. GCP 01 (Rev 0.3, 28 July 2026) was drafted by ECC and has not yet been tabled with worker representatives and affected community representatives for confirmation

of mutual understanding, as Indicators 2.6.1.S and 4.6.1.S require. A single documented consultation, recorded on an attendance register, closes this before the main assessment. Action and timeframe are in section 6.

1 Purpose and scope

1.1 This record demonstrates how the dispute resolution process for the NamPower FSC Group Scheme was developed through culturally appropriate engagement with affected stakeholders, workers and local communities.

1.2 It is a supporting document to the Grievance and Complaints Procedure (GCP 01) and is held by ECC as Group Scheme Manager for production at audit.

2 Requirement

2.1 The requirement is set by the National Forest Stewardship Standard for the Republic of Namibia (FSC-STD-NAM-01-2019), read with the Standard for Group Entities in Forest Management Groups (FSC-STD-30-005 V2-0):

Indicator	Requirement	Verifier
1.6.1.Z	A publicly available dispute resolution process is in place, developed through culturally appropriate engagement with affected stakeholders.	Organisational procedure or policy
2.6.1.Z / 2.6.1.S	A dispute resolution process is developed and implemented through culturally appropriate engagement with workers, with mutual understanding between managers and workers.	Procedure; interviews with managers and workers
4.6.1.Z / 4.6.1.S	A dispute resolution process is developed with directly affected communities, with demonstrated mutual understanding with community leaders.	Procedure; interviews with management and community leaders

2.2 "Culturally appropriate engagement" in the Namibian standard means engagement in the relevant languages, through recognised community structures and Traditional Authorities where applicable, at a literacy level and in forms that affected people can use. This record shows how that test is met.

3 How the process was developed

3.1 The ESIA public participation process

3.1.1 The dispute resolution process is built on the public participation process of the Environmental and Social Impact Assessment for the Otjikoto Biomass Power Project. The ESIA was managed by SLR Consulting for NamPower, with co-financing input from the European Investment Bank, and ran a formal public participation process under the Environmental Management Act 7 of 2007 and its EIA Regulations. Interested and affected parties, neighbouring landowners, farming communities, the Tsumeb Municipality and other stakeholders were identified, notified and given opportunity to comment through the assessment period leading to the Environmental Clearance Certificate.

3.1.2 The Socio-Economic Impact Assessment (Ashby Associates, Rev 12, September 2019) carried out stakeholder engagement with host and neighbouring communities on livelihoods, employment, land use, in-migration and gender, and identified the community-facing measures that inform how grievances are received and handled. The ESIA process therefore established, with

affected stakeholders, the channels, languages and community structures that the grievance mechanism uses.

3.2 Ongoing engagement under the EMP

3.2.1 Engagement did not end with the ESIA. The EMP for Harvesting and Transportation (Final, November 2020) commits NamPower to continuing engagement that keeps the dispute resolution process live and culturally appropriate:

- (a) **Steering Committee** (EMP 7.1.1.14): established before harvesting, meeting at least quarterly then bi-annually, obtaining input from key stakeholders and specialists.
- (b) **Stakeholder and Community Engagement Plan and stakeholder register** (EMP 7.1.2.1, 7.1.2.6 to 7.1.2.9): maintained and updated, with at least annual communication with identified stakeholder groups.
- (c) **Landowner consultation and feedback** (EMP 7.1.2.2) and a designated contact for complaints from landowners, harvesters and the public (EMP 7.1.2.3).
- (d) **San participation** (EMP 7.1.2.10): identification of a spokesperson for the San people to ensure effective communication and input.
- (e) **Complaints registers** for stakeholders and for workers, with publicised channels (EMP 7.1.2.12 to 7.1.2.17).

3.2.2 These are ongoing workshops and consultation forums, not a single historical event. They give affected stakeholders a continuing route to shape and test the dispute resolution process, which is what Indicators 1.6.1, 2.6.1 and 4.6.1 require.

3.3 Cultural appropriateness built into the mechanism

3.3.1 GCP 01 and the project mechanism carry the cultural appropriateness features directly:

- (a) Grievances may be lodged in any Namibian language, including Oshiwambo, Otjiherero, Khoekhoegowab, Rukwangali, Rumanyo, Thimbukushu, Silozi, Setswana, Ju|'hoansi and other San languages, and Afrikaans, with qualified interpreters engaged by ECC at no cost to the stakeholder.
- (b) Oral and verbal submissions are accepted and written down on the complainant's behalf, which suits low-literacy and remote stakeholders.
- (c) Where activities affect communal land, customary tenure or areas of cultural significance, ECC engages the relevant Traditional Authority recognised under the Traditional Authorities Act 25 of 2000 and respects customary protocols for entry, consultation and dispute resolution.
- (d) Where the rights of Indigenous Peoples or historically marginalised communities may be affected, the Scheme applies the FSC Free, Prior and Informed Consent framework (FSC-GUI-30-003).
- (e) Anonymous submission is available on every channel, and an anti-retaliation commitment protects workers, women, youth, elderly persons and other vulnerable stakeholders.

4 The documents that make up the process

4.1 The dispute resolution process comprises the following documents:

Document	Reference	Role
Grievance and Complaints Procedure	GCP 01, Rev 0.3, 28 July 2026	Lead FSC dispute resolution process for the Group Scheme. Responds to FSC 1.6, 2.6, 4.6.
Site Complaints and Grievance Register	TMP 06, Rev 0	Farm-level register where grievances are recorded.
Project Stakeholder Grievance Mechanism	BIO-GRM v0.1, 27 January 2025	NamPower project mechanism and one lodgement channel; upgrade to v1.0 pending.
HCV Assessment Report for Namibia	ECC-0-0-REP-03-A, Rev 3, 20 May 2026	Identifies cultural and community values (HCV 5 and 6) that engagement and dispute resolution must protect.
EMP for Harvesting and Transportation	SLR, Final, November 2020	Source of the stakeholder engagement and complaints commitments.

5 Records that evidence engagement

5.1 The following records are held or are to be held by ECC and demonstrate the engagement to the auditor:

- (a) ESIA public participation records held by NamPower and SLR Consulting (I&AP register, comment and response reports, Environmental Clearance Certificate).
- (b) Project stakeholder register and Steering Committee minutes (EMP 7.1.1.14, 7.1.2.6).
- (c) TMP 06 Site Complaints and Grievance Register, and the master grievance register held by ECC.

6 Action to close the gap

6.1 One step remains before Indicators 2.6.1.S and 4.6.1.S are fully evidenced: a documented consultation on GCP 01 with worker representatives and representatives of directly affected communities, confirming mutual understanding of the process.

6.2 Action: the ECC Group Scheme Manager convenes the consultation, presents GCP 01 in the languages of the participants, records questions and changes raised, and files the attendance register and minutes as the verifier for Indicators 2.6.1.S and 4.6.1.S. Responsible: ECC Group Scheme Manager, with contractor and NamPower support. Timeframe: before the main assessment. The attendance register is filed with this record.

7 Conclusion

7.1 The dispute resolution process for the Group Scheme was developed through culturally appropriate engagement: the ESIA public participation process established the channels and community structures with affected stakeholders, ongoing EMP engagement keeps that engagement live, and the mechanism itself is built for any language, oral submission, Traditional Authority protocols and FPIC. GCP 01, TMP 06 and BIO-GRM are the documents to present. The one outstanding step is the recorded consultation on GCP 01 in section 6; on completion, Indicators 1.6.1, 2.6.1 and 4.6.1 are fully evidenced.

For compliance register

1. Record this document (BIO-TK-[XX], ECC-NPW-FSC-DRE-01, Rev 0.1) in the Working Documents and Tools Register, category C, and assign its BIO-TK toolkit number.
2. Hold and record the GCP 01 consultation with worker and community representatives; file the attendance register and minutes as the 2.6.1.S and 4.6.1.S verifier. Owner: ECC Group Scheme Manager. Before the main assessment.
3. Document reissued in the NamPower FSC Group Scheme toolkit template at Rev 0.1. Section 6 (action to close the gap) reinstated; it was missing from the Rev 0 file. Content otherwise unchanged. Retire the ECC-branded Rev 0 layout.