

ASEAN CENTRE FOR ENERGY (ACE)

STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)

ACCELERATING SUSTAINABLE ENERGY TRANSITION MULTI-PHASE PROGRAMMATIC APPROACH & ADDITIONAL FINANCING

(ASET MPA - P181555)

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Revised

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ABBREVIATION AND ACRONYMS

ACE	ASEAN Centre for Energy
ASEAN	Association of Southeast Asian Nations
EAP	East Asia Pacific
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GHG	Greenhouse Gas
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IPF	Investment Project Financing
MPA	Multi-phase Programmatic Approach
OHS	Occupational Health and Safety
OIPs	Other Interested Parties
PAPs	Project Affected Parties
PMU	Project Management Unit
PICs	Pacific Island Countries
PIU	Project Implementation Unit
PRDR	Pacific Regional Data Repository
RE	Renewable Energy
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan (Country Level)
SEF	Stakeholder Engagement Framework (Project Level)
TA	Technical Assistance

1. INTRODUCTION

The Accelerating Sustainable Energy Transition Multi-Phase Programmatic Approach (ASET MPA) aims to accelerate renewable energy (RE) scale-up and grid integration in participating countries across the EAP region. The Program will be anchored in three complementary pillars of activities: (i) enabling policies, (ii) investments to develop flexible electricity networks, and (iii) de-risking clean energy investments. The Program will take a coordinated approach to support the development and adoption of parallel policy and regulatory amendments, institutional strengthening, and market development to achieve greater levels of ambition, scale, and sustainability.

Economic growth in developing countries in East Asia and the Pacific (EAP)¹ has been strong over the past fifteen years, driving energy demand and the region's carbon footprint. Over the past decades, economic growth in developing East Asia and the Pacific (EAP) has driven a large expansion in energy demand. Around 70 percent of electricity generation in EAP countries is from fossil fuels and as a result, CO₂ emissions in EAP have tripled between 2000 and 2020. At the same time, smaller EAP countries face vulnerability to climate change, experiencing over half of the world's annual losses from natural disasters, amounting to approximately US\$ 50 billion in 2021.

A pivotal challenge is how to meet the region's projected growth in energy demand while reaching its net zero targets. Several developing EAP countries (including Vietnam, Indonesia, and the Philippines) have committed to carbon neutrality by 2050 or 2060 and to reduce emissions significantly under revised nationally determined contributions (NDCs). Yet, electricity generation is projected to increase from 8.4 million GWh in 2020 to 12.6 million GWh in 2030, driven by economic growth and rising living standards. Therefore, a key challenge will be how to meet the region's growing energy demand while transitioning to low-carbon sources.

2. BACKGROUND

Energy Sector – EAP Context. Renewable energy (RE) is already the lowest cost power supply option in many countries around the world. The first step towards net zero for the EAP region is to decarbonize the power sector and electrify the end user sectors. With RE becoming cost-competitive with fossil fuels, there is a global momentum to scale up RE and ambitious targets have been set by EAP countries. However, progress on RE development varies across the region, with China and Vietnam leading in solar and wind capacity installations, while other EAP countries have fallen below expectations. Regional trade initiatives also offer opportunities to exploit lower-carbon resources, providing economic benefits and alternative clean energy sources. However, only about 2 percent of total energy consumption in the region traded through bilateral contracts.

EAP faces various challenges in rapidly scaling up RE deployment. Policy and regulatory frameworks to support RE scale-up vary, with China and Vietnam having relatively favorable conditions (according to the World Bank's Regulatory Indicators for Sustainable Energy), while

¹ The developing East Asia and the Pacific region is defined by the World Bank's operational presence.

others like Lao PDR and Mongolia are still lagging. Improvements are needed in areas such as incentives, procurement, RE integration, and carbon pricing. Cross-border transmission and distribution infrastructure inadequacies hinder the connection of load centers to RE power generation capacity, while private capital investment faces barriers like increasing costs, lack of competitive procurement frameworks, and high perceived risks in grid connection and off-taker reliability. Addressing these challenges is crucial to achieving the region's ambitious RE targets and facilitating the transition to a lower-carbon energy trajectory.

Energy Sector – ASEAN Context. Countries in ASEAN have seen rapid increase of coal-fired power in the last 20 years. This is particularly in Indonesia, Vietnam, and the Philippines, where coal accounts for over 50 percent of power generation mix. Today, about 80 percent of the region's power supply comes from coal and natural gas and the region's non-OECD countries represent about 74% of global coal consumption in 2020.

ASEAN has recently presented its Strategy for Carbon Neutrality. The Strategy is designed to complement the ASEAN Member States' national initiatives in meeting their respective NDCs. It identifies targeted strategies, where regional cooperation is most beneficial to complement the ASEAN Member States' national initiatives. They are to: (i) accelerate green value chain integration; (ii) promote regional circular economy supply chains; (iii) connect green infrastructure and markets; (iv) enhance interoperable carbon markets; (v) foster credible and common standards; (vi) attract and deploy green capital; (vii) promote green talent development and mobility; and (viii) offer green best practice sharing.

Among other priorities, the Strategy recognized that power trade among ASEAN countries can bring economic benefits from deferment or avoidance of investments in domestic power generation for the region and provide an alternative clean energy source for countries who may otherwise develop fossil fuel-based power plants. Also, the WB's report (2019) estimates that regional integration in ASEAN members could have NPV of US\$1.6 billion while realizing carbon emission reduction potential of 7% by 2035. Though development has been ongoing for over 20 years, regional efforts has not led to the integrated regional power system as expected - so far only about 2% of total energy consumption in the region is traded through bilateral contracts.

3. PROGRAM AND PROJECT DESCRIPTION

3.1. ASET MPA Program

The MPA program will finance projects across the EAP region which includes a diverse range of countries with varying environmental and social characteristics, each providing its own opportunities and risks. Program typologies include i) regional technical assistance (TA) to strengthen regional cooperation and increase planning and execution capacity of priority projects; and ii) country specific physical investments and TA to strengthen the electricity grid, increase the capacity of transmission lines, increase electricity access and scale up renewable energy generation. The scale of investments varies greatly between countries.

Activities proposed in phase one of the MPA consist of two investment projects in two countries and a technical assistance project implemented by ACE. Phase one projects have completed

project preparation and negotiations, and hyperlinks to the latest relevant documentation for each project are as follows: (i) China: Shaanxi Energy Transition and Innovation Demonstration in the Heating Sector Project (P177841); (ii) Republic of the Marshall Islands: Renewable Energy Generation and Access Increase (P181250); and (iii) a regional technical assistance project (ACE): Clean Energy and Power Trade Development in Southeast Asia Project (P181555). Additional projects are under consideration in Cambodia, the Federated States of Micronesia, Indonesia, Mongolia, and Papua New Guinea are for later phases. The Program comprises three pillars summarized below:

Pillar one: Enabling policies. The pillar will focus on policies on market and regulatory frameworks, focusing on measures such as introducing auctions for renewables, tariff design, and cost allocation methodologies. The pillar will also include work on decarbonization strategies, involving the development of sector-specific roadmaps and clear targets for RE development. Power system planning and capacity development will be integral, too, supporting the identification of lowest-cost investments aligned with low-carbon roadmaps. Ensuring the financial health of utilities and regulatory governance will be critical for mobilizing commercial financing for RE scaling, and the MPA will help assess options to improve the financial viability of utilities.

Pillar two: Capacity and flexibility of electricity networks. The successful implementation of the energy transition in EAP hinges on upgrading existing and constructing new power network infrastructure. Addressing the massive funding challenge, the proposed Program outlines key activities to support capacity and flexibility of electricity networks including expansion and upgrades of the existing transmission grid, development of cross-border interconnection projects; rehabilitation and enhancement of distribution networks and mini-grids, with a focus on addressing challenges in Pacific Islands states. Lastly, investments in grid flexibility, including battery energy storage systems, supervisory control, and data acquisition (SCADA) systems, and the modernization of power dispatch centers.

Pillar three: De-risking clean energy investments. The proposed MPA aims to strategically deploy concessional financing to catalyze commercial funding and reduce the overall cost of transitioning to sustainable energy. To address project risks and attract private investment, the MPA emphasizes de-risking activities through IPFs, guarantees, and PforRs. Examples of support include public financing for pilot or public-private partnership projects, payment and termination guarantees to facilitate private investment, credits, or guarantee lines with financial intermediaries for distributed energy resources.

3.2. ASET MPA – ASEAN PROJECT

The proposed project development objective (PDO) is to accelerate RE scale up in the ASEAN countries, including through regional power trade amongst countries in Southeast Asia. The activities designed to achieve the PDO encompass: (1) Regional RE policy support and climate financing, (2) Regional power trade, and (3) Knowledge sharing, consultations, and capacity building.

(1) Regional RE policy support and climate financing:

- **Knowledge sharing and centralized database (energy projects, E&S data, etc.):** Creating a centralized database and facilitating knowledge sharing among all stakeholders. The activity would involve collecting and disseminating GIS data on renewable potential, energy projects, environmental and social data including disaggregated gender-based employment data. The database(s) would serve as a platform for knowledge sharing and collaboration. It could also form the basis of discussions for members countries, investors and IFIs alike looking to develop RE investment strategy and planning.
- **Market sounding and procurement strategy for renewable energy investors in ASEAN:** Conducting market research and engaging with renewable energy developers to assess their interest and capacity to invest in the region. This would help identify potential investors and promote private sector participation in renewables. Aside from market studies (regional and national), this would also involve organizing workshops, conferences, and matchmaking events to connect developers with potential project opportunities. The data will also inform the region-wide procurement strategy that would benefit member states looking to facilitate RE investments in their own countries.
- **Accessing climate finance:** Technical support (including financial, technical, and legal) to access carbon markets and climate finance mechanisms to support renewable energy projects. It involves providing guidance on project eligibility, carbon credit generation, and registration, and accessing financial resources (e.g., through review of fundraising applications). Climate Finance would also include Green/Sustainability-linked Financing Principle based finance and the requirement for capacity/institutional building at the country, sector and institutional level. Another mechanism to be explored will be to set up a standardized process to issue Renewable Energy Certificates (REC) which will facilitate not only financing but also clean energy trading for which the demand is high in the region. The activity could involve workshops and conferences, to garner consensus on regional level on the standards and guidelines.

(2) Facilitating Regional power trade:

- **Platform to facilitate regional power system planning:** Under the ASEAN Power Grid project, an interconnection study has been commissioned, to be completed before the APG's MOU expiration in 2025. In addition to this region-wide initiative, additional support for technical capacity building and infrastructure required to collect and aggregate system investments plans to identify opportunities for optimization of system planning. The TA would support the creation of such a platform to help countries and regional institutions identify critical cross-border interconnection projects and put in place guidelines, processes, and modalities to speed up the development of regional interconnectors, markets, and trading arrangements that are lacking in the region. IN addition, the study will outline the market data to identify supply/demand trends and opportunities for both sellers and buyers would be explored. The aim of such platform would be to facilitate cross-border trade and cooperation in the renewable energy sector, through data sharing on investments that may be potentially contentious due to diversity of stakeholders and require regional forums of ministerial bodies, regulators, system operators, generators, investors, and civil societies to discuss significant trade-offs and build up trust that is critical to progress. Such platform would also enable larger

pool of sellers and buyers, enabling the expansion of liquidity and opportunities for investors in RE projects.

- **Pre-feasibility studies for regional power trade:** Studies to assess the technical, economic, and environmental pre-feasibility of renewable energy projects (national or regional level) and transmission/interconnection investments. These studies would help identify potential projects, evaluate their viability, and provide recommendations for their implementation, including (but not limited to) solar resource availability, grid integration, financial viability, environmental impacts, etc. The studies are estimated to cost \$400,000 each to conduct three new interconnection investments already identified in the ASEAN power grid initiative.

(3) Knowledge sharing, Consultations and Capacity building

- **Consultations:** Holding consultations with member states and their national agencies/utilities to reach consensus on policy direction is a crucial part to promote RE and regional power trade. ACE would be expected to fully utilize their convening power and coordination capacity to provide a venue for discussion among interested parties. The topics for consultation would be decided in discussion with World Bank teams, who will also provide inputs and support to the process, as well as in coordination with ASEAN secretariat to ensure continuity and synchronization with the ongoing dialogue in the region.
- **Capacity building/Training:** Capacity building would be critical part of the sustainable solution for decarbonization and development of RE markets. ACE would aggregate the capacity gaps identified in their analytical work and dialogue, as well as through work on this program, to structure a capacity building program for interested governments, agencies and utilities. The organization of such workshops would be conducted in coordination with World Bank team and ASEAN secretariat.
- **Internships and Secondment Opportunities:** Learning experience may be provided to member states' ministries, regulators and utility staff through internships and secondments to other member states and beyond. The candidates will be selected on competitive basis on their objectives and learning plan that would be submitted to ACE.

4. ENVIRONMENTAL AND SOCIAL OVERVIEW

Developing EAP now accounts for nearly 30 percent of global primary energy demand (28 percent as of 2018). Rapid industrialization coupled with urbanization has contributed to a 130 percent expansion of total energy production over the past 20 years. Demand growth has, however, been supported by an increased use of fossil fuels in power generation, particularly coal, as abundant and cheap resources remain available in the region. On average, 70 percent of electricity generation comes from fossil fuels in developing EAP countries.

The MPA Program will finance projects across the EAP region which includes a diverse range of countries with varying environmental and social characteristics, each providing its own opportunities and risks. Program typologies include: i) regional technical assistance (TA) to strengthen regional cooperation and increase planning and execution capacity of priority projects; and ii) country specific physical investments and TA to strengthen the electricity grid, increase the capacity of transmission lines, increase electricity access, and scale up renewable energy generation. The scale of investments varies greatly between countries.

Each project under the MPA will have its own preparation process including environmental and social assessments and risk management instruments proportionate to the respective project. In addition to addressing the specific environmental and social issues, these assessments and instruments will consider structural issues such as implementation arrangements, co-financing arrangements, capacity support and other considerations critical to effective project implementation.

The Program's overall E&S risk classification is Substantial based on the typical E&S risks associated with RE power and transmission investments and based on risk classification for the three Phase 1 IPF (Investment Project Financing) investments which are all currently classified as Substantial. The Program is expected to have significant environmental benefits including reduction of greenhouse gas (GHG) emissions and improvements to air quality. Key E&S risks may be direct, indirect, and cumulative and include: (i) hazardous waste disposal, (ii) land and groundwater contamination, (iii) potential impacts from the implementation of TA activities, (iv) operational phase impacts to biodiversity (e.g., use of pesticides on transmission line easements and bird and bat kills from electrocution) as well as those more generally associated with civil works such as invasive species, dust, noise, erosion and sedimentation, resource consumption, alternation and disturbance of habitats, waste generation and worker safety, (v) engagement and protection of vulnerable people including access to RE sources and willingness/ability to pay, (vi) community level economic impacts created in coal-producing communities as transitions to RE, (vii) land access arrangements including in areas where land is held in customary title and/or subject to dispute, (viii) risks and design opportunities associated indigenous peoples and ethnic minorities, (ix) community impacts in RE areas of having new investments requiring areas of land, (x) SEA/SH, gender opportunities and risks and equity and benefit sharing arrangements.

The ASET MPA Program (P181555) is being prepared under the World Bank's Environment and Social Framework (ESF).

5. WORLD BANK STANDARD ON STAKEHOLDER ENGAGEMENT

This SEF is developed to promote participation of both affected and interested stakeholders so that the project design, in particular stakeholder engagement approaches and activities are implemented in a participatory and inclusive manner, transparent, promote equal opportunity, and minimize environmental and social risks.

This SEF is following the objectives of The Environmental and Social Standard 10 (ESS10) of the World Bank's Environmental and Social Framework (ESF):

- To establish a systematic approach to stakeholder engagement that will help identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

According to the definition provided in the ESS10, "stakeholder" refers to individuals or groups who:

- i. are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as 'affected parties'); and
- ii. may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Projects outcomes in any way.

6. OBJECTIVE AND KEY PRINCIPLE

Under the ESS10, a Stakeholder Engagement Plan (SEP) should be developed that sets out the principles and procedures for stakeholder engagement in a manner that is consistent with ESS10 and implemented proportionate to the nature and scale of the project and its potential risks and impacts.

In certain instances where the specifics for creating a detailed Stakeholder Engagement Plan are not available, a stakeholder engagement framework (SEF) may be adopted. Considering the MPA approach of the ASET Program, as specifics such as project location, technical and technological details, and other key factors are not yet known and will be decided at a future date, which is why a SEF is deemed appropriate. This initial SEF is being developed as a roadmap and part of an iterative process in communicating with stakeholders, laying down the path of how the project will interact with stakeholders, external and internal alike. This SEF is the starting point of an iterative and is complemented by a more comprehensive stakeholder engagement strategy and plan at a project level (i.e. Stakeholder Engagement Plan or SEP). The SEF will be updated periodically as necessary. This SEF should be also updated if the project architecture related circumstances change significantly. This includes changes in significance of identified stakeholder groups, allocation of risks and responsibilities between institutional stakeholders, etc. To allow uptake of Stakeholders concerns and problems during the project planning stage, guidance on how to develop a fully functional Grievance Mechanism is developed and presented in detail in chapter 9.

In order to meet good practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and early on and life-cycle approach:* Public consultations will be arranged during the whole life cycle starting during planning, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns. Stakeholders should have sufficient knowledge on the different themes to be able to give sound, adequate and appropriate feedback.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications, build effective relationships and sensitize the engagement methods tailored to meet the needs, expectation, and divergence of various stakeholder groups and individual. The participation process for the project is inclusive. All stakeholders are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly, and the cultural sensitivities of diverse ethnic groups. Therefore, stakeholders must be inculcated, integrated, and be provided with the capacities, conditions and motivated to participate.
- *Adaptive engagement management:* engagement strategies shall be adapted if mismatch of expectations amongst various stakeholders becomes evident (e.g. institutional and NGOs) or if the strategy shows shortcomings in soliciting and enabling feedback for various reasons (inadequate transparency, inappropriate format, etc.)

7. DEVELOPMENT OF COUNTRY LEVEL SEPs

As mentioned above, this SEF serves as a roadmap for development of country level SEPs. These will propose targeted stakeholder engagement programs which largely depend on the details, including the footprint, geographic location, and timing of the project activities. The scope and level of detail of the SEPs should be commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project and might be prepared for a certain group of project activities in the same area. The methodology for developing the SEPs shall adopt a participatory approach in consultation with all the stakeholders concerned by the project at the level of the intervention zones and at the level of the various institutions involved (national and regional). The analysis carried out considers the local context, the existing situation and values the good practices and requirements linked to inclusive, responsible, and constructive consultations.

Draft SEPs will be disclosed as early as possible and the views of stakeholders on the SEP shall be sought, including on the identification of stakeholders and the proposals for future engagement. The SEP shall be updated if significant changes are identified. The SEP describes the timing and methods of and implementing agencies' engagement with stakeholders throughout the life cycle of the project as agreed with the Bank, distinguishing between project-affected parties and other interested parties. The SEP also describes the range and timing of information to be

communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them. According to ESS10 the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.

The country level SEP will include a procedure on receiving, addressing, and responding to grievances (grievance mechanism to receive and facilitate resolution of project affected parties/PAPs concerns and grievances). It is required to implement the grievance mechanism and respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

The SEP should be clear and concise and focus on describing the project and identifying its stakeholders. The development of the SEPs will be based on a screening to ensure relevant information that may be useful to understand the characteristics of people/communities that will be impacted by the project is included. This may for instance include environmental data, census data, socio-economic data (information on income, employment...), gender data, levels of poverty, vulnerability, etc. and their implications from an environmental and/or social point of view will be explained. The project description shall be kept targeted and relevant to understand the types of stakeholder groups impacted by the project. Each SEP shall have the list of identified stakeholders and their analysis and will ensure that those (i) that are affected or likely to be affected by the project (project-affected parties); and (ii) may have an interest in the project (other interested parties) are adequately identified and classified. Some groups may be interested in the project because of the sector it is in, and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open and accessible to anyone interested. Based on the analysis the SEPs, adopt the engagement strategies based on stakeholder needs and analysis of their Interest and Influence.

The drivers of vulnerability will be in details assessed and identified during development of the SEP building upon the groups identified hereunder. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, reduced mobility, lack of understanding of a consultation process).
- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print, or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having

small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns).

- If there are no organizations active in the project area that work with vulnerable groups, such as persons with reduced mobility, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

The SEPs will briefly describe what information will be disclosed in what forms, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience. The focus will be on segregating what the key information will be in public domain, in what languages, and where it will be best accessible to allow inclusive access.

The SEPs needs to be targeted and should demonstrate the ability to develop a strategy that is stakeholder specific, concise yet comprehensive and should explain the opportunities for information access, public consultation, provide a deadline for comments, and explain how people will be notified of new information or have opportunities to provide feedback including how these will be assessed and considered.

Details of what resources will be devoted to managing and implementing the SEPs and what budget is allocated to ensure implementation including monitoring and evaluation activities will demonstrate the capacity and commitment to implement the SEP.

The SEPs shall be prepared in consultation with the stakeholder and disclosed and consulted on in line with the disclosure and consultation requirements outlined in this SEF.

8. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The identification and mapping of stakeholders facilitates targeted engagement mechanisms and understanding the objectives, interests, and incentives of key stakeholders. For consultations, representative stakeholders, including representatives of marginalized and vulnerable groups, need to be identified at the national, regional, and local levels as applicable. For participatory approaches, target groups and champions need to be identified. Underlining principles, as laid out in the methodology section, such as inclusiveness and representation, might be influenced by the capacity and willingness of the identified target groups to get engaged.

ESS 10, read in conjunction with ESS1, recognizes the following categories of stakeholders:

1. **Project Affected Parties.** These includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, wellbeing, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project.

2. **Other Interested parties (OIPs)** refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups. The stakeholder identification has been expanding to a wider area than the project will affect, since the locations have not all been identified, and important details of project activities are still under development.
3. **Disadvantaged/Vulnerable Individual or Groups.** Includes those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will consider considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon whom they depend.

8.1. Project Affected Parties (PAPs)

Identify individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively. The SEPs should focus particularly on those directly and adversely affected by project activities. Mapping the impact zones by placing the affected communities within a geographic area can help define or refine the project's area of influence. The SEPs should identify others who think they may be affected, and who will need additional information to understand the limits of project impacts.

8.2. Other Interested Parties (OIPs)

'Other Interested Parties' constitute broader stakeholders who may be interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation and implementation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

Moreover, civil society and nongovernmental organizations may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the Borrower to consider and address in the assessment process. Some groups may be interested in the project because of the sector it is in (for example, mining or health care), and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open to anyone interested.

8.3. Disadvantaged / Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies.

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, reduced mobility, lack of understanding of a consultation process).
- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print, or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns).
- If there are no organizations active in the project area that work with vulnerable groups, such as persons with reduced mobility, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

Within the project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Elderly 65+
- People with chronic medical conditions
- Women
- Girls from 10 to 17 years old
- Young people aged 18 to 35 who have not attended schools.
- Young people aged 18 to 35 with the capacity to design and carry out projects.
- Young people aged 18 to 35 with the capacity to design and carry out income-generating projects.
- People with reduced mobility of any nature regardless of if under permanent care or self-cared.
- Single parent headed households.
- Female heads of low-income household or with young children.
- Economically marginalized and disadvantaged groups.
- Communities in remote and inaccessible areas with low communication.

- All the above categories residing in geographically challenging areas.
- Migrant workers accommodated in worker camps, persons with limited literacy and education levels.
- People living of the ecosystem services without diversified livelihoods.
- Internal displaced people
- LGBT+ (Lesbian, Gay, Bisexual, and Transgender/Transexual People)

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

8.4. Project Stakeholder Categories

The project level SEPs will expand the list of projects affected parties and include those likely adversely by the project activities. These may include parties affected by beneficial impacts, but the focus of engagement shall lie on drivers of the adverse impacts.

8.5. Summary of Stakeholder Engagement Needs and Analysis of Their Interest and Influence

Identified stakeholder groups and their level of influence cross-referenced with their interest they may have in the project will determine the type and frequency of engagement activities necessary for each group. The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project:

Table 1. Stakeholder Analysis Matrix

Activity	Stakeholder	Potential Participation/Interaction with the Project	Levels of Interest	Level of Influence	Level of Engagement

The key Identified stakeholder groups and their level of influence cross-referenced with their interest they may have in the project will determine the type and frequency of engagement activities necessary for each group.

9. STAKEHOLDER ENGAGEMENT PROGRAM

9.1. Purpose and Timing of Stakeholder Engagement

Stakeholder engagement is a key pillar for the success of the project, including the sustainability of the interventions and outputs achieved. Thus, this approach is adopted for all phases of the project, i.e. development and implementation. Stakeholder mobilization is an inclusive process initiated and conducted throughout the project life cycle. Project stakeholders will be mobilized in distinct and appropriate ways, depending on their different interests and circumstances, to meet the objectives of the SEP which are to:

- i. Establish a systematic approach to stakeholder engagement that will enable the Project Management Unit/ Project Implementation Unit (PMU/PIU) to properly identify stakeholders and establish and maintain a constructive relationship with them, particularly those affected by the project.
- ii. Assess the level of stakeholder interest and buy-in and enable their views to be considered in the design of the project and its environmental and social performance.
- iii. Encourage the effective engagement of all parties affected by the project throughout its lifetime on issues that may affect them and provide the means to do so.
- iv. Ensure that stakeholders receive timely, understandable, accessible, and appropriate information on the environmental and social risks and impacts of the project.

The stakeholder engagement program will therefore inform, disclose, and consult on various project documents and activities early on to establish a dialogue with Project Stakeholders from project planning through implementation and operation. All environmental and social risk management instruments will be prepared, disclosed, and consulted on before the beginning of relevant activities. These instruments will be disclosed at least 15 days before Public Consultations on the websites of the implementing agencies. The disclosure packages will include:

- Project announcements
- Brief description of project activities, zones of intervention and duration of interventions
- The project activities' calendar
- Eligibility criteria for PAPs and vulnerable groups
- Description of public consultation arrangements (time, place, etc.)
- Ways of submitting comments and feedback
- Key deadlines
- The respective draft E&S risk management instruments
- Information on the Gender-based Violence or GBV sensitive Grievance Redress Mechanism (its objectives, the grievances management committees set up, the modes of referral to the committees, the complaints handling process, etc.)

9.2. Strategy for Outreach and Information Disclosure

The SEPs shall describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience. The selection of disclosure—both for notification and providing information—should be based on how most people in the vicinity of the project routinely get information and may include a more central information source for national interest. A variety of methods of communication should be used to reach most stakeholders. The project should select those that are most appropriate and have a clear rationale for their choices. The plan should include a statement welcoming comments on the proposed engagement plan and suggestions for improvement. For remote stakeholders, it may be necessary to provide for an additional newspaper outlet or separate meeting, or additional documents that should be placed in the public domain. The public domain includes:

- Newspapers, posters, radio, television.
- Information centers and exhibitions or other visual displays.
- Brochures, leaflets, posters, nontechnical summary documents and reports.
- Official correspondence, meetings.
- Website, social media.

Written information will be disclosed to the public via a variety of communication materials, which shall include brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. The implementing entity will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project’s environmental and social performance. The website will also provide information about the grievance mechanism for the project. The communication material shall be in substance, content and information range adapted to respond adequately to the following questions:

- the relevant phase of the project,
- which stakeholder or group of stakeholders are targeted,
- type of information to be shared,
- feedback requirements influencing the project design and architecture,
- is immediate action to be taken,
- adverse social and environmental impacts.

The SEPs shall propose an Information Disclosure Strategy consider the specific needs of stakeholder as well as: Project stage, List of information to be disclosed, Methods proposed, Locations/date, Target Stakeholders, Percentage reached, Responsibilities.

9.3. Strategy for Consultation

Public consultations need to be properly structured and well managed: For public hearings to constitute an effective form of consultation, it is advisable to set the rules early on. The consultations should begin early in the project preparation process when the design options, potential impacts or changes in implementation are known: During project preparation, there is no fixed prescription as to when consultation. Good practice recommends consultations to be initiated as early as possible, and certainly when key elements of project design and associated impacts are identified. The earlier the consultations are held, the more useful they can be to influence project design. During project implementation, it is advisable to consult periodically to communicate project progress to key stakeholders and obtain feedback from them. In addition, consultations should be organized when there is a request to have meetings or when there are changes in project design leading to different or new types of impact. The table below depicts the essence of the Consultation process.

Table 2. Essence of Consultation Process

WHAT	<ul style="list-style-type: none"> ❖ Design alternatives. ❖ Impacts (positive and negative, cumulative, intangible, legacy) ❖ Design changes. ❖ Mitigation measures ❖ Implementation arrangements
WHO	<ul style="list-style-type: none"> ❖ Project affected people. ❖ Indirectly affected people. ❖ Beneficiaries ❖ Interest groups ❖ NGOs/CSOs (local and international) ❖ Local governments

	<ul style="list-style-type: none"> ❖ Institutional stakeholders ❖ Local community ❖ Implementation partners
WHEN	<ul style="list-style-type: none"> ❖ During project design ❖ When impacts are identified (mostly during preparation) and continued during implementation, as agreed during preparation. ❖ Sufficient before project appraisal ❖ Part of preparation of ESF instruments ❖ For projects where designs are not final at the time of project approval, during implementation. ❖ When design changes lead to new impacts (implementation) ❖ For complex projects throughout implementation
WHERE	<ul style="list-style-type: none"> ❖ Close to stakeholders ❖ Transportation if far for vulnerable groups ❖ Safe place ❖ Multiple locations for large projects ❖ All directly affected stakeholders should have an opportunity to attend
HOW	<ul style="list-style-type: none"> ❖ Public hearings ❖ Focus groups. ❖ Individual interview, face-to-face, individual consultations ❖ Household surveys ❖ Electronic consultations ❖ Establish project mechanisms to receive comments and suggestions from stakeholders. ❖ Document and disseminate
WHY	<ul style="list-style-type: none"> ❖ Help to identify opportunities and risks. ❖ Require by WB standards / countries regulations. ❖ Improve project design and implementation. ❖ Increase project ownership and sustainability
FOLLOW UP	<ul style="list-style-type: none"> ❖ Document and disseminate results to stakeholders. ❖ Reflect results in project document.

The consultations shall follow these principles:

- 1) Explain objectives of consultations.
- 2) Manage Expectations.
- 3) Agree on the agenda.
- 4) Provide advance information.
- 5) Provide sufficient time for people to voice their concern – manage time adequately.
- 6) Use right moderators with skill and accepted by the community.
- 7) Don't allow a single stakeholder domination.
- 8) Assess the need for interpretation.
- 9) Make special efforts to ensure that vulnerable – women, people with reduced mobility – are consulted in settings where they can express their views openly.

10) Conclude the meeting by reiterating how the comments and suggestions received are proposed to be used.

Public consultation plan will follow inclusive, participatory, and transparent principles. An example of public consultation plan matrix is outlined below.

Table 3. Public Consultation Plan

Project stage	Consultation Topics	Method	Target Groups	Timeframe	Person in charge

9.4. Strategy to Incorporate the View of Vulnerable Groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunities to access information, provide feedback, or submit grievances:

Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the project design, implementation, and operation.

It is advisable to conduct discussions with representatives of the stakeholders identified and with persons knowledgeable about the local, country, and sector contexts. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to socio-political, societal conflict, educational, or practical factors. For example, barriers can exist for ethnic, linguistic, and religious minorities; low-income households; women; youth; persons with limited mobility; or persons with reduced mobility.

Work with organizations supporting people with reduced mobility to develop messaging and communication strategies to reach them. Prepare local messages and pre-test through participatory process, especially targeting key stakeholders, vulnerable groups and at-risk populations. Special arrangements may need to be made for the transportation of women, the elderly and other vulnerable groups: In some socio-cultural settings, women may need to be transported separately. Elderly and other vulnerable groups may need special assistance in reaching the consultation location.

Some of the strategies that will be adopted to effectively engage and communicate to vulnerable group will be towards:

1. Where literacy levels are low, additional formats such as location sketches, physical models, and film presentations may be useful to communicate relevant information.
2. Assist the public in understanding technical documents, for example by publishing simplified summaries, non-technical background explanations, or access to local experts.
3. Women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate in the

engagement teams. Separate meetings should also be scheduled for girls and women at different levels, in addition to the general assembly meetings. It is appropriate to bring them together in focus groups, rather small, at each stage of the project to freely discuss aspects of gender-based violence and issues that are specific to them. Consultations with women and girls should be conducted independently, in safe and confidential spaces, and with trained female facilitators.

4. **Young Women (Specific Characteristics):** ensure community engagement teams are gender balanced and promote women's leadership within them, design online and face-to-face surveys and other engagement activities so that women in unpaid care work can participate in the engagement teams. Consultations with young women in this group should be conducted independently, in safe and confidential spaces, and with trained female facilitators.
5. **Girls and Adolescent Girls (Specific Characteristics):** ensure community engagement teams are gender balanced and promote women's leadership within these, design online and face-to-face surveys and other engagement activities so that women in unpaid care work can participate in the engagement teams. Consultations with young women in this group should be conducted independently, in safe and confidential spaces, and with female facilitators specially trained to work with these groups. As a general matter, focus groups with minors should not be conducted unless there is a specific need to be addressed; advocacy groups working on behalf of minors, and especially girls, should be engaged first before engaging directly with minor girls.
6. **People with reduced mobility:** provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology.

Based on further vulnerable groups identified during development of project level SEPs and identification of drivers of their vulnerabilities the strategy toward engaging with vulnerable groups will be adapted accordingly.

10. GRIEVANCE MECHANISM

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a program to be submitted and responded to in a timely manner.

10.1. Project Level Grievance Redress Mechanism (GRM)

In compliance with the World Bank's ESS10 requirement, a specific GBV-SEA/SH grievance mechanism will be set up for the project level SEP.

The project level grievance mechanism shall rely on the following principles:

Principle 1. Proportionality: A mechanism scaled to risk and adverse impact on affected communities. To assign the risk rating the results of the environmental and social assessment will be used to scale a grievance mechanism to risk and adverse impact on affected communities and decide on the complexity of the grievance features. This will give an understanding on who

will be affected and what the impacts on them are likely to be, what the greatest challenges of the Project are.

Principle 2. Cultural Appropriateness: Designed to take into account culturally appropriate ways of handling community concerns. To achieve this, projects should: 1) seek input on culturally acceptable ways to address grievances from significantly different groups within affected communities, including different ethnic or cultural groups within the project-affected area; 2) understand cultural attributes, customs, and traditions that may influence or impede their ability to express their grievances, including differences in the social and gender roles and responsibilities of subgroups (especially women) and cultural sensitivities and taboos; and 3) agree on the best way to access grievance mechanisms, taking into consideration the ways communities express and deal with grievances.

Principle 3. Accessibility and affordability: A clear and understandable mechanism that is accessible to all segments of the affected communities at no cost. Grievance procedures work only if they present no (or low) barriers to access by communities. Accessibility depends on: 1) clear communication—availability of easy-to-understand information about the grievance process and how the mechanism works; 2) ease of use—simple, convenient, culturally appropriate means for filing complaints, at no cost to complainants (this may involve encouragement and assistance for affected communities to make complaints when problems arise) and 3) continuous support in understanding, raising and formally submitting grievances.

Principle 4. Transparency and Accountability to All Stakeholders. The GRM shall demonstrate to the stakeholders: 1) who in the organization is responsible for handling complaints and communicating outcomes, and who is in charge of the mechanism oversight; 2) they will have input into its development; 3) sufficient information on how to access it; and 4) have power to ensure that the process is adhered to by those directly responsible for managing it.

Principle 5. Voluntarily, Freely and without retaliation: A mechanism that prevents retribution and does not impede access to other remedies. The entire engagement process not only Grievance awareness building will encourage stakeholders to share their concerns freely, with the understanding that no retribution will be exacted for participation. The GRM can be triggered in parallel to seeking remedy from formal national authorities. Non-project recourse mechanisms present a reasonable alternative in some circumstances but do not replace a working project-level grievance mechanism.

Dedicated communication materials (GRM pamphlets, posters) will be created to help stakeholders familiarize themselves with the grievance redress channels and procedures. A GRM guidebook/manual will also be developed, and suggestion boxes installed in affected municipalities and near the construction sites of the HPP. In order to capture and track grievances received under the project, a dedicated GRM Management Information System/database is planned. The GRM shall also serve as an opportunity for Citizen Engagement entry point as it will allow uptake of project specific questions, queries, comments, and positive feedback.

Principle 6. Survivor centricity and safety, confidentiality, and anonymity. The survivor-centered approach is a set of five principles that aims to create a supportive environment in which each survivor's rights are respected and in which the person is treated with dignity and

respect. The five principles are: 1) confidentiality and informed consent; 2) safety; 3) non-discrimination; 4) respect; 5) access to services.

A GBV sensitive GRM will apply the survivor-centered approach principles by having procedures and measures to deal with such allegations in a safe, timely, and ethical manner. The GRM will determine steps for handling and reviewing this type of allegations for each stage of the process; procedures for review of complaints or incident reports, including information on the investigation and verification process; confidentiality requirements for dealing with cases (e.g., consent and information sharing protocols); internal reporting of allegations, for case accountability. Protocols will include a pathway to refer survivors to appropriate support services and how disciplinary actions are determined for project actors following requirements of local labor legislation, relevant national regulations, as well as mandatory reporting requirements for SEA/SH incidents for adults and children in each country.

10.2. Raising Grievances

The grievance procedure shall be designed to be multiple, accessible, effective, easy, understandable, confidential and without costs to the complainant. Any grievance can be brought to the attention of the GRM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax, or personal delivery to the addresses/numbers to be determined. All grievances can be filled anonymously.

At the level of the project intervention sites, a complaint register book, complaints forms and a grievance box will be made available to the public on a permanent basis (information about SEA/SH grievances will be maintained separately and in a secure and confidential location with strictly limited access). The latter will be deposited at the administrative office or at the project liaison office.

Complaints can be received directly at the Project Management/Implementation Unit via telephone calls or free SMS (through the project's toll-free number), through social networks (Facebook page, WhatsApp, etc.), the project's website, email (dedicated specifically to receive complaints) where the project's technical team and especially the specialist in environmental and social risk management will proceed to process complaints.

The subsequent SEPs shall have details on each Grievance entry point, grievance administration processes, timelines, investigation activities, the 2nd tier appeal process for unresolved grievances before referring to legal recourse and closure conditions.

Further details on Grievance admission channels and points shall be publicized in the SEPs and shall be part of the awareness building campaign.

10.3. Grievance Process

A Grievance Redress Mechanism (GRM) must be a simple process whereby stakeholders can submit their complaints free of charge and, if necessary, anonymously or via third parties. It should allow complaints to be submitted in more than one format. The following steps outline

the process that may be followed to resolve a grievance. All grievance forms are contained in Annex 14.

STEP 1: Receives and Log Grievance.

Grievances can be submitted orally, in writing via suggestion/complaint box, through free telephone hotline/mobile, mail, SMS, social media (WhatsApp, Viber, Facebook, etc.), email, website, at community levels. The GRM will also allow anonymous grievances to be raised and addressed. The project level SEPs shall include details of Grievance entry points while the interim avenues are available and provided below. The project shall appoint dedicated person to lead GRM Process. This SEF refers to this resource as “GRM Focal Point” or “GRM Coordinator”.

Recording of grievance, classifying the grievances based on the typology of complaints and the complainants to provide more efficient response, and providing the initial response immediately if possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with reduced mobility, people with language barriers, etc.) and the nature of the complaint.

All grievances shall be logged using the Grievance Form (Annex 14.1). The assigned person responsible for GRM (GRM Focal Point or GRM Coordinator) will log, document, and track all grievances received. Grievances shall be assigned a case number and records of communication/consultation shall all be attached with the relevant entry and filed.

STEP 2: Acknowledging Receipt of a Grievance

The project’s GRM focal point shall acknowledge receipt of any grievances as soon as possible, but up to seven (7) days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected. A Grievance Receipt Form (Annex 14.1) shall be signed, and a copy provided to the complainant.

STEP 3: Assess and Investigate Grievance

The following steps shall be performed in a timely manner to avoid delaying resolution of a grievance:

1. Obtain as much information as possible from the person who received the complaint, as well as from the complainant to gain a first-hand understanding of the grievance.
2. Undertake a site visit, if required, to clarify the parties and issues involved. Gather the views of other stakeholders, if necessary and identify initial options for settlement that parties have considered.
3. Determine whether the grievance is eligible.
 - Eligible grievances include all those that are directly or indirectly related the project.
 - Ineligible Complaints may include those that are clearly not related to the project or its contractors’ activities, whose issues fall outside the scope of the Grievance Redress Mechanism procedure or where other community procedure would be more appropriate to address the grievance.

4. If the grievance is deemed ineligible it can be rejected however a full explanation as to the reasons for this must be given to the complainant and recorded in the Grievance Database.
5. If the grievance is eligible, determine its severity level using the significance criteria (see an example of significance criteria in Table 5 below). This will help to determine whether the grievance can be resolved immediately or requires further investigation and whether senior management will need to be informed of the grievance.
6. If the grievance concerns physical damage, (e.g. crop, house, community asset) take a photograph of the damage and record the exact location as accurately as possible.
7. Inform the complainant of the expected timeframe for resolution of the grievance.
8. Enter the findings of the investigation in the Grievance Database.

The project team will aim to resolve any grievances within 30 days from the date that it was received. This timeframe can be extended to 60 days for more complex grievances (e.g. level 4 grievances), if required.

Table 4. An Example of Significance Rating Criteria

Significance Level	Type of Grievance	Responsibility
Level 1	A grievance that is isolated or 'one-off' and essentially local in nature and restricted to one complainant. Note: Some one-off grievances may be significant enough to be assessed as a Level 4 grievance e.g. when a national or international law is broken (see Level 4 below)	GRM Focal Point / GRM Coordinator
Level 2	A grievance that extends to the local community or region and has occurred more than once, which is judged to have the potential to cause disruption to the project's operations or to generate negative comment from local media or other local stakeholders	Project Manager (or equivalent)
Level 3	A grievance which is widespread and repeated or has resulted in long term damage and/or has led to negative comment from local media, or is judged to have the potential to generate negative media and local stakeholder comments (e.g. damage to a sacred site or flooding of local school)	Project Manager (or equivalent)
Level 4	A one-off complaint, or one which is widespread or repeated and, in addition, has resulted in a serious breach of project's related policies, country level or International Law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g. failure to pay compensation where appropriate, e.g., resettlement)	Program Manager

STEP 4: Grievance Resolution.

All grievances shall be dealt with on a case-by-case basis. However, all will require further discussions with complainants and community members that seek to jointly identify and select measures for grievance settlement. This will help to increase ownership of solutions and to mitigate perceptions that resolutions unfairly benefit the project.

- An incident investigation team may be tasked with seeking resolution to the grievance. This may entail a dialog or series of dialogs between affected parties to find a solution to the grievance. Alternatively, it may entail investigating the underlying cause of the grievance and action any changes required to internal systems to prevent a recurrence of a similar grievance.
- An Incident Investigation Report will be completed within 28 days (considered good practice).
- During the 28 days of dialog or investigation, the GRM Focal Point will co-ordinate conflict resolution activities necessary to contain and resolve any actual or potential conflicts arising from the reported grievance. If the case is complex and the stated resolution timeframe cannot be met, an interim response will be provided (oral or written) that informs the stakeholder of the delay, explains the reasons, and offers a revised date for next steps.
- Where possible, grievances will be addressed directly by the project team (lead by the GRM Focal Point or GRM Coordinator). The resolution proposal shall be respectful and considered, including rationale for the decision and any data used in reaching it. If wider consultation is necessary, grievances will be forwarded to a third party. This third party should be neutral, well-respected, and agreed upon by both Project Team and the affected parties. These may include public defenders, legal advisors, local or international NGOs, or technical experts. In cases where further arbitration is necessary, appropriate government involvement will be requested.

As a last resort, aggrieved parties have a right to take legal action. This is a more formal rights-based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by the arbitrator or courts based on compliance with laws, policies, standards, rules, regulations, procedures, past agreements, or common practice.

STEP 5: Sign-Off on Grievance

- The GRM Focal Point / GRM Coordinator will seek sign-off from the complainant(s) that the grievance has been resolved.
- In instances where the stakeholder is not satisfied with actions taken, the grievance will either:
 1. Be escalated to senior management and a decision will be taken either to implement supplementary actions or to consider initiating an appeal process; OR
 2. The GRM Focal Point will approach a neutral or third party to assist in mediating and resolving the grievance; OR
 3. The GRM Focal Point will approach the host country's judiciary to further address the grievance.
- Following this process, the GRM Focal Point/ GRM Coordinator will again approach the stakeholder to obtain sign-off on actions implemented.
- The staff member who signs off the complaint should have sufficient knowledge about the topic to provide assurance.
- Once sign-off has occurred, this should be recorded in the Grievance Log.

STEP 6: Monitoring and Reporting

The project management will monitor grievances routinely as part of the broader management of the Project. This entails good record keeping of complaints raised throughout the life of the construction and operation of the Project. On receipt of grievances, electronic notification to management must be distributed. Grievance records must be always made available to management.

Monthly internal reports will be compiled by the GRM Focal Point and distributed to the management team. These grievance reports will include:

- The number of grievances logged in the proceeding period by level and type.
- The number of stakeholders that have come back after 30 days stating they are not satisfied with the resolution.
- The number of grievances unresolved after 60 days by level and type.
- The number of grievances resolved between the Project Team and complainant, without accessing legal or third-party mediators, by level and type.
- The number of grievances of the same or similar issue.
- Project team's responses to the concerns raised by the various stakeholders.
- The measures taken to incorporate these responses into project design and implementation.

These reports and other records will be made available for external review if required. An appropriate grievance report should be part of the project team's annual reporting. A hard copy will be located at the project office, and an electronic copy will be made available online.

10.4. Summary of GRM Process



Table 5. Summary of GRM Process

Process	Description	Timeframe
1. Receives and log grievance	<ul style="list-style-type: none"> <input type="checkbox"/> How: Email, phone number, address, suggestion/complaint box, facebook, sub-window in project website, etc. <input type="checkbox"/> Who: Responsible for GRM GRM Focal Point / GRM Coordinator) to Receive, log, track grievances <input type="checkbox"/> Tool: Grievance Database Form (Annex 14.1) 	1 day
2. Acknowledge Grievance	<ul style="list-style-type: none"> <input type="checkbox"/> Acknowledge receipt of any grievances as soon as possible, but up to 7 days from the date it was submitted and shall inform timeframe of response. <input type="checkbox"/> Tool: Grievance Receipt Form (Annex 14.1) 	7 days
3. Assess and investigate	<ul style="list-style-type: none"> <input type="checkbox"/> Assess and determine whether grievance is eligible or not eligible (clearly not related to project or its contractor's activities). Non-eligible: can be rejected with full explanation to the complainants and recorded in the logbook. <input type="checkbox"/> Assign grievances category (Table 4). <input type="checkbox"/> Consult with relevant parties. <input type="checkbox"/> May require site visits. <input type="checkbox"/> Enter the findings of investigation in the logbook. 	7 days
4. Grievances resolution	<ul style="list-style-type: none"> <input type="checkbox"/> Identify further actions. <input type="checkbox"/> Response provided to complainant, indicate more time if needed. <input type="checkbox"/> Method: dialogs, Incident Investigation Report, if wider consultation is needed engage third party, last resort through courts/legal. 	28 days (after receipt of grievance)
5. Sign-off	<ul style="list-style-type: none"> <input type="checkbox"/> Confirm to the complainant that grievance can be signed off. <input type="checkbox"/> If cannot be signed off: return to step #2 <input type="checkbox"/> Record in the logbook 	
6. Monitoring and Reporting	<ul style="list-style-type: none"> <input type="checkbox"/> Monitor grievances routine. <input type="checkbox"/> Regular reports: 	

11. Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) Complaints

With respect to complaints relating to sexual exploitation or abuse (SEA) and sexual harassment (SH), because of the risk of stigma, reprisals and rejection that can be associated, it is very important for GM to put in place specific procedures that can ensure grievances are registered, recorded, and handled in a safe, anonymous, and confidential manner. These procedures need to balance the need to be survivor-centered while ensuring due process by considering the alleged perpetrators' rights to privacy and presumption of innocence. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's consent.

The SEPs will propose measures to prevent and response to risks of GBV/SEA/SH, including an Accountability and Response Framework and a Referral Pathway. The Accountability and Response Framework and the Referral Pathway will detail how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the codes of conduct (CoC) by workers. The Accountability and Response Framework should include at a minimum:

- How allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process.
- Procedures to report SEA/SH allegations internally for case accountability.
- A referral pathway to refer survivors to appropriate support services; and
- Procedures that clearly lay out confidentiality requirements for dealing with cases.
- A redress mechanism

For SEA/SH, the GRM should primarily serve to: (i) refer complainants to the GBV service provider, and (ii) record resolution of the complaint.

11.1. Definitions

The following terms are defined as:

- **Sexual exploitation** is understood as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).
- **Sexual abuse** is understood as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).
- **Sexual harassment (SH)** is understood as any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.
- **Whistle blower:** The International Labor Organization (ILO) defines it as "the reporting by employees or former employees of illegal, irregular, dangerous or unethical practices by employers."
- **Gender based violence** is violence directed against a person because of that person's gender or violence that affects persons of a particular gender disproportionately.

11.2. SEA/SH Procedure

When a SEA or SH type grievance is submitted, measures set out in the Accountability and Response Framework should be applied and GBV focal point in the GRM at the project level who is trained in managing SEA and SH type grievances should handle the complaint.

It is therefore essential that prior to SEA/SH complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, confirmation that the survivor has received support, and that sanctions have been enacted, etc. If projects are unable to train or hire a GBV focal point, they should at minimum train persons in the complaint uptake channels on how to appropriately and confidentially record complaints.

When the complaint is received, Grievance Process should be adapted to ensure the following:

1. Confidentiality of Information: Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security. No identifiable information on the survivor should be stored in the GRM database. The GRM should not ask for, or record, information on more than the following related to the SEA/SH allegation:
 - The nature of the complaint (what the complainant says in her/his own words without direct questioning).
 - If, to the best of the survivor's knowledge, the perpetrator was associated with the project.
 - If possible, the age and sex of the survivor.
 - If possible, information on whether the survivor was referred to services.
2. After recording the above information, the complaint should be referred to the GBV focal point should provide survivors with immediate information regarding options for reporting and responding including referral to existing GBV service providers. No attempt should be made by GBV focal point to investigate the complaint. It is to be accepted and immediate referral should be provided to GBV service providers.
3. The GRM should have in place processes to immediately notify both the Implementing Agency (IA) and the World Bank of any SEA/SH complaints, with the consent of the survivor. For World Bank reporting protocol refer to the Environmental and Social Incident Response Toolkit (ESIRT).
4. The decision of reporting to the GRM and whether or not to access services should be at the discretion of the survivor based on the information provided. Thus, if the survivor simply wants to access services and not file a formal complaint, this should also be accepted. The GM should serve primarily to refer complainants to GBV service providers (whether related to the project or not) immediately after receiving a complaint. In addition, survivors should be informed of any mandatory reporting requirement and limits of confidentiality based on the country's legislation.
5. When determining GBV service providers, considerations should be given to organizations that can provide support to: (i) health; (ii) psychosocial; and (iii) legal support. Services should follow global standards and guidelines.
6. Any survivor reporting GBV through a reporting mechanism in a World Bank Investment Project Financing (IPF) should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because often, the specifics of the

perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care. SEA/SH allegations shall be handled within 24h from the reception of the grievance. Where the complainant consents, the GRM should initiate procedures to determine whether disciplinary measures should be implemented, as set out in the Accountability and Response Framework.

11.3. Processing, Resolving and Closure of Grievance

Processing, Resolving and Closure of Grievance should be adapted in the case of SEA/SH type grievances keeping in mind the following:

1. As described earlier, when a complaint is received, it is registered in the project GRM and referred to the GBV focal point at the project level and subsequently to the relevant GBV service provider with the consent of the complainant. The service provider initiates accountability proceedings with the survivor's consent. If the survivor does not wish to place an official complaint with the employer, the complaint is closed. When the survivor proceeds with the complaint, the case is reviewed through the established SEA/SH resolution mechanism that will be developed at the project level and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the codes of conduct. Within the established SEA/SH resolution mechanism, it is confirmed that the action is appropriate, and the GRM is then informed that the case is closed.
2. With regard to the support given to the survivor by the GBV service provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.
3. All SEA/SH survivors who come forward before the project's closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If a project is likely to close with SEA/SH cases still open, prior to closing the project appropriate arrangements should be made with the GBV service provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the Borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.
4. For SEA/SH allegations, the Accountability and Response Framework will detail how these allegations are handled (administrative investigation procedures) and how disciplinary actions for violation of the required behaviors are determined. Some SEA/SH allegations may be referred to local or national authorities for the purposes of criminal investigation, in accordance with the wishes of the survivor or in compliance with mandatory reporting requirements in the relevant jurisdiction. To address security, retaliation, and safety of survivors, the project and the GBV service providers will ensure

confidential handling of all data and information relating to survivors, and confidentiality in all processes leading to support for survivors and the resolution of each case.

12. World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

13. Monitoring and Reporting

13.1. Monitoring Reports During Implementation of Activities

The ASET MPA for the Pacific Region will support monitoring and evaluation (M&E) activities to track, document, and communicate the progress and results of the project, including monitoring of this SEF and any subsequent document expanding on engagement activities. Monitoring reports documenting the overall environmental and social performance of the project will be prepared by the Project Team and submitted to the World Bank bi-annually as part of the overall progress reporting requirements as set forth in Environmental and Social Commitment Plan. These reports will include a section regarding stakeholder engagement and grievance management. Regional communication, activities on advancement of implementation of relevant activities which are expected to take place at the early offset prior to formal engagement of financing partners including the World Bank shall be subject to documenting requirements of each of the national systems.

Notwithstanding, the commitment is to go beyond, and adequate records shall be kept in line with this SEF. The feedback and grievances received through the project GRM will be aggregated and included in periodical reports the frequency and substance of which shall be determined at financing close stage. This will be reflected in the country level SEPs.

13.2. Involvement of Stakeholders in Monitoring Activities

The project provides several opportunities to stakeholders, to monitor certain aspects of project performance and provide feedback. Some projects include a role for third parties in monitoring the project or impacts associated with the project. The SEPs shall describe any plans to involve

project stakeholders (including affected communities) or third-party monitors in the monitoring of project impacts and mitigation programs. The criteria for selection of third parties should be clear. For further information, see the World Bank's Good Practice Note on Third-Party Monitoring.

13.3. Reporting Back to Stakeholder Groups

This SEF and project level SEPs will be periodically revised and updated as necessary during project implementation to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEPs.

Results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholder groups at various platforms. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The Quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Information on public engagement activities may be conveyed to the stakeholders in two possible ways: (i) Publication of a standalone annual report on project's interaction with the stakeholders, and (ii) Adopt software solutions to scale up the two-way interaction and feedback, by using survey platforms, preferable using one dashboard to make it easy to measure and understand the feedback or alternative online platform can be applied), in order to meet citizens' expectations for change created by their engagement, use their input to facilitate improved development outcomes.

Monitoring of a beneficiary feedback indicator on a regular basis. The indicator will be determined in the updated SEP and may include: number of consultations, including by using telecommunications carried out within a reporting period (e.g. monthly, quarterly, or annually); number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; number of press materials published/broadcasted in the local, regional, and national media.

14. Annexes

14.1. Grievance Forms

13.1.1. Grievance Log Form

Grievance / Incident Reference Number: (To be assigned by the receiving office / GRM coordinator / GRM Focal Point)			
1	Name (The complainant should feel free to remain anonymous)	Name/s Complainants: I wish my identity not to be disclosed: <input type="checkbox"/> Yes <input type="checkbox"/> No My identify should not be disclosed without my consent: <input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Contact information (Specify how you would like to be contacted and provide details)	Contact me by: Telephone: Email: Physical Address: Others:	
3	Preferred language for communication		
4	Description of grievance or incident	What is the issue: Where did it happen: When did it happen: How did it happen: Who caused it: What was the impact/outcome:	
5	Frequency of incident	One off? <input type="checkbox"/> Yes. Please describe <input type="checkbox"/> No. Please specify	
6	What would you like to happen to resolve grievance?		
Signature:			
Date:			
Sent by:			
Grievance resolution status:			

14.1.2. Grievance Record Form

Grievance/Incident Reference number:	
Date Submitted:	
Target date for resolution:	
Name:	
Address and contact details:	
Grievance received by:	
Name of Grievance Focal Point / Coordinator:	
Description of Grievance	
Assessment of Grievance Level:	Level: Notification to senior management? <input type="checkbox"/> Yes <input type="checkbox"/> No
Actions to Resolve Grievance	
Delegation to:	
Action(s)	Who: When: Completed: <input type="checkbox"/> Yes. Date of completion: <input type="checkbox"/> No
Response / Resolution:	
Strategy to communicate response:	
Sign-off:	
Date:	
Conclusion	
Is complainant satisfied?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments from Grievance Focal Point / Coordinator:
Grievance closed?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, Grievance resubmitted? <input type="checkbox"/> Yes <input type="checkbox"/> No

14.1.3. Grievance Receipt Form

Grievance/Incident Reference number:	
Date Submitted:	
Target date for initial meeting to address grievance:	
Name:	
Address and contact details	
Grievance received by:	
Name of Grievance Focal Point / Coordinator:	
Contact details of grievance coordinator:	Phone: Email: Address:

14.1.4. Grievance Tracker Form

Ref No	Date	Recipient	Complainant	Description of Grievance	Priority	Step (1-6)	Action	Responsible for resolution	Status (Open/Closed)	Findings	Resolution	Date of Close out	Additional Comments / Follow up

14.2. Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

14.3. Example of an SEP Budget Table

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
1. Estimated Staff salaries* and related expenses					
1a. <i>E.g., Communications consultant</i>					
1b. <i>E.g., Travel costs for staff</i>					
1c. <i>E.g., Estimated salaries for Community Liaison Officers</i>					
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. <i>E.g., Project launch meetings</i>					
2b. <i>E.g., Organization of focus groups</i>					
3. Communication campaigns					
3a. <i>E.g., Posters, flyers</i>					
3b. <i>E.g., Social media campaign</i>					
4. Trainings					
4a. <i>E.g., Training on social/environmental issues for PIU and contractor staff</i>					
4b. <i>E.g., Training on Gender-Based Violence (GBV) for PIU and contractor staff</i>					
5. Beneficiary surveys					
5a. <i>E.g., Mid-project perception survey</i>					
5b. <i>E.g., End-of-project perception survey</i>					
6. Grievance Mechanism					
6a. <i>E.g., Training of GM committees</i>					
6b. <i>E.g., Suggestion boxes in villages</i>					
6c. <i>E.g., GM communication materials</i>					
6d. <i>E.g., Grievance investigations/site visits</i>					
6e. <i>E.g., GM Information System (setting up or maintenance)</i>					
6f. <i>Other GM Logistical Costs</i>					
7. Other expenses					
7a. ...					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

13.4. Example of the Monitoring and Reporting Table (SEP level)

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of SEA/SH cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	<p>Records from the implementing agency and other relevant agencies</p>
<p>Stakeholder engagement impact on project design and implementation</p> <p>How have engagement activities made a difference in project design and implementation ?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>

		<p>received is reflected in project design and implementation.</p> <ul style="list-style-type: none"> • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion, and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>