BARS Consulting

Stakeholder Engagement Plan

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LIST OF ABBREVIATIONS AND SYMBOLS

CESMP	Contractor's Environmental and Social Management Plan
CS	Consulting Services
EMR	Environmental Monitoring Report
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental & Social - Standards
GOST	State Standard
GRM	Grievance Redress Mechanism
GRT	Government of the Republic of Tajikistan
IEC	Information, Education, and Communication
M&E	Monitoring and Evaluation
PA	Public Association
PC	Public Consultation
PIU*	Project Implementation Unit
PMG**	Project Management Group
PL	Power Line
PO	Public organisation
RT	Republic of Tajikistan
SB	Substation
SEP	Stakeholder Engagement Plan
SEP	Strategic Environmental Policy
SPZ	Special Protection Zone
UN	United Nations
WB	World Bank

* The PIU is OJSK Shabakahoi intiqoli barq, which bears full responsibility for the implementation of this project before the Ministry of Energy and Water Resources.

** The project management group is formed and operates under the OJSK Shabakahoi intiqoli barq

Introduction

1.1. Project Description

1 Central Asia has enormous untapped potential to improve energy security, expand energy connectivity and trade, and accelerate the transition to clean energy. Improved geopolitical relations in Central Asia over the past six years have opened new opportunities for regional energy linkages and trade. Uzbekistan has expressed interest in joint hydropower development in Tajikistan and the Kyrgyz Republic. Kazakhstan has also expressed support for the development of large hydropower facilities in the Kyrgyz Republic to improve integrated management of water and energy resources in the region. Tajikistan is completing the resynchronization of its energy system with the Central Asian Power System (CAPS). Turkmenistan is currently the main supplier of energy resources in the region, especially in winter. Electricity exports from Tajikistan to Uzbekistan also resumed in 2018 after a nine-year hiatus. The increased interest in electricity trade in Central Asia has made energy links and trade an important regional agenda for Central Asian countries.

Tajikistan's power system, formerly part of the CAPS, has been operating in isolation from it since 2009. Currently, active negotiations on its connection are underway between the power systems of the CAPS and the power system of Tajikistan. Connection schemes and necessary design studies for emergency automation in both the southern and northern parts of the power system are being worked out. In addition, there is a need to strengthen national and regional interconnections to ensure sustainable exports of electricity to be generated by new regional projects such as the Rogun HPP. This project aligns with the World Bank's Environmental and Social Framework (ESF), ensuring compliance with its Environmental and Social Standards (ESS1-ESS10). The Environmental and Social Management Plan (ESMP) provides detailed mitigation measures for environmental risks, while the Stakeholder Engagement Plan (SEP) outlines mechanisms for engaging affected communities.

1.2. Components proposed under the MPA project

The proposed project (MPA1) includes the following three components:

(i) Component 1: Pilot Regional Electricity Market;

(ii) Component 2: Strengthening intersystem linkages and system resilience;

(iii) Component 3: Strengthening the enabling environment and institutional capacity, which are described in more detail below:

1. Component 1: Pilot Regional Electricity Market. This component aims to support the introduction of a pilot short-term market platform to promote regional electricity trade in Central Asia. The proposed pilot project aims to demonstrate how a regional market can work in Central Asia to meet the growing energy demand in the region by efficiently deploying cheaper energy, improving security and reliability of supply, which will also contribute to economic growth and green transition in the region.

2. Component 2: Strengthening and digitalisation of regional interconnections. The REMIT MPA will support regional market development through software and hardware. The project will also finance critical investments to enhance regional electricity trade both regionally and nationally.

Potential investments in Tajikistan are summarised below:

-Construction of new 500 kV overhead line SB Regar - SB Dushanbe (2nd PL circuit).

-Modernisation of open switchgear and associated systems at SB 500 kV Regar by replacing the 3rd AT group (3x267 MVA).

-Modernisation/expansion of SB 500 kV Dushanbe by installing the 2nd group of autotransformers (3x167 MVA).

3. REMIT MPA Component 3: Strengthening the enabling environment and institutional capacity. As effective cross-border trade depends on sound energy sectors at the national level, this component will support activities aimed at: (i) strengthening the financial viability and governance of national energy sectors

(e.g. tariff reform); and (ii) strengthening regulators - through training, capacity building, specific activities. The component will also support project supervision, management and coordination.
The institutional structure for project implementation consists of the Ministry of Energy and Water Resources (MEWR) as the main Implementing Agency (IA), existing Project Implementation Units (PIUs) under MEWR oversight, and newly established Project Management Groups (PMGs) at the regional level. The PMGs will support environmental and social (E&S) management activities locally in coordination with the PIUs.

1.3 Objectives of the stakeholder engagement plan

This SEP is designed to fully and openly engage stakeholders in the implementation of this Project to carefully identify various stakeholders and develop an approach to reach each subgroup, establish constructive dialogue among them, and allocate responsibilities for implementing stakeholder engagement activities. SEP is aimed at ensuring broad and active engagement of stakeholders and timely creation of an atmosphere of constructive dialogue in the process of preparation and implementation of the Project. The plan provides an appropriate approach to consultation and disclosure and defines methods for engaging with stakeholders.

The major objectives of the SEP are as follows:

- identify major stakeholders, which may be affected, benefit from the Project and / or impact the Project;
- describe requirements to interaction with stakeholders as provided in the legislation of the Tajikistan and World Bank ESS;
- describe mechanisms of interaction with stakeholders, including efficient methods and channels for distribution of project information via various platforms accessibly by various types of stakeholders given the needs thereof: efficient communication tools for consultations and information disclosure;
- describe measures to be deployed to eliminate the obstacles to engagement and how the opinions of various affected groups will be taken into account;
- recommend the PIU, a contractor and local specialists at the facilities on building mutually respectful, beneficial and long-term relations with the stakeholders;
- determine functions and duties of responsible parties on SEP implementation;
- develop efficient grievances mechanism for the Project.

The main objectives of the SEP can be summarized as follows:

Purpose	Description
Guidelines for engagement	Provide guidance on stakeholder engagement consistent with international best practice.
Identification of key stakeholders	Identify key stakeholders affected and/or likely to affect the Project and its activities.
Effective methods of information exchange	Determine the most effective methods, timelines and structures for sharing project information, ensuring regular consultation.
Stakeholder engagement process	Develop a process to allow stakeholders to influence the planning and design of the project.
Grievance redress and resolution mechanisms	Establish formal mechanisms to address and resolve grievances.

Roles and responsibilities	Define roles and responsibilities for SEP implementation.
Reporting and monitoring measures	Identify reporting and monitoring measures to ensure SEP effectiveness and periodic reviews based on findings.

Table 1: Main objectives of SEP

2. Objectives of the stakeholder engagement plan

SEP is developed in accordance with the recommendations and requirements of the World Bank's environmental and social standard ESS10 and is a part of the environmental and social assessment of the Project.

Active stakeholder engagement in project activities is a key factor in promoting Project accountability and sustainability of its results, as well as providing feedback to improve implementation and results.

In accordance with the best practice approaches, the Project Implementing Agency/PIU will be required to apply the following principles in their stakeholder engagement activities:

• Openness: Public consultation throughout the life of the Project will need to be conducted openly, without external interference, coercion or intimidation. Consultation sites will be easily accessible and will not require extensive travel, entry fees or prior permission for access.

• Cultural appropriateness: The activities, format, timing and location of consultations will be consistent with local customs and norms. Activities will be conducted in a language understood by participants.

• Informed participation and feedback: Information will be provided in advance and disseminated across all stakeholders in appropriate language and format. Opportunities for feedback will be provided to stakeholders, and recommendations and comments from stakeholders will be reviewed and taken into account.

• Inclusion: Consultations will include all categories of people in a local community, including persons with disabilities, older people, and other vulnerable groups. If necessary, the Project Implementing Agency/PIU will provide logistical support to enable participants with disabilities and those without sufficient financial means or access to transportation to attend public meetings organized under the Project.

• Gender sensitivity: Consultations will be organized in such a way as to ensure equal access to both women and men. If necessary, the Project Implementing Agency/PIU will organize separate meetings and focus group discussions for men and women, use facilitators of the same gender as the participants, and provide additional support to facilitate access to information.

In accordance with best practices, the Project Implementing Agency (MEWR), through its PIUs and regional PMGs, will apply the following principles in their stakeholder engagement activities...:

- the process beings early in the project planning process to gather initial view on the project proposal and inform project design;
- feedback of stakeholders must be encouraged, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- continues on an ongoing basis, as risks and impacts arise;

- the process is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a time frame that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s), and is understandable to stakeholders;
- considers and responds to feedback in an adequate manner and further measures must be undertaken;
- supports active and inclusive engagement with project-affected parties;
- the process is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- relevant Project documentation must be disclosed to the public.

2.1 Applicable national laws and policies

LEGISLATIVE and REGULATORY FRAMEWORK

This Resettlement Policy Framework is based on the legislation of the Republic of Tajikistan, namely: (i) the 1994 Constitution of the Republic of Tajikistan (as amended); (ii) the 1996 Land Code of the Republic of Tajikistan (as amended); and (iii) the 2023 Civil Code of the Republic of Tajikistan, as well as the World Bank's standard on involuntary resettlement (WB SES5).

Constitution of the Republic of Tajikistan 1994

The Constitution of the Republic of Tajikistan is the main law of the country, which enshrines the state system, the rights and duties of citizens, and the powers of state bodies. It serves as a basis for interaction with various stakeholders within the framework of the strategy.

Tajikistan is defined as a sovereign democratic, legal, secular and social state with a presidential form of government. The state is committed to ensuring equality before the law, protecting the rights and freedoms of citizens, and supporting social, economic and cultural development. The territory of the country is indivisible and any action aimed at its division is prohibited.

Citizens' rights and freedoms, including the right to work, education, health care, property, freedom of speech and participation in State governance, were a priority and were protected by the Constitution. Citizens are guaranteed freedom of religion and political choice, as well as equality of opportunity regardless of gender, nationality, language and other factors. Special attention is paid to the social protection of citizens, including pensions, health care and care for the poor.

Local authorities, including representative and executive structures, work within the limits of their authority as established by the laws.

The Constitution also emphasizes Tajikistan's commitment to international legal norms. International treaties ratified by the country become part of its legal system and take precedence in case of conflict with national legislation.

Law on the treatment of natural and legal persons of 23 July 2016, No. 1339

The Law regulates the procedure for filing and considering appeals (complaints) of individuals and legal entities with State bodies, public associations and other organisations and the consideration of these appeals, including:

- Conditions for submission of applications from individuals and legal entities and their consideration
- Registration and recording of applications from individuals and legal entities
- Rights of individuals and legal entities when considering applications
- Obligations of the relevant authority and organisation dealing with applications from individuals and legal entities

• Requirements to the results of consideration of applications

Law on the Right of Access to Information

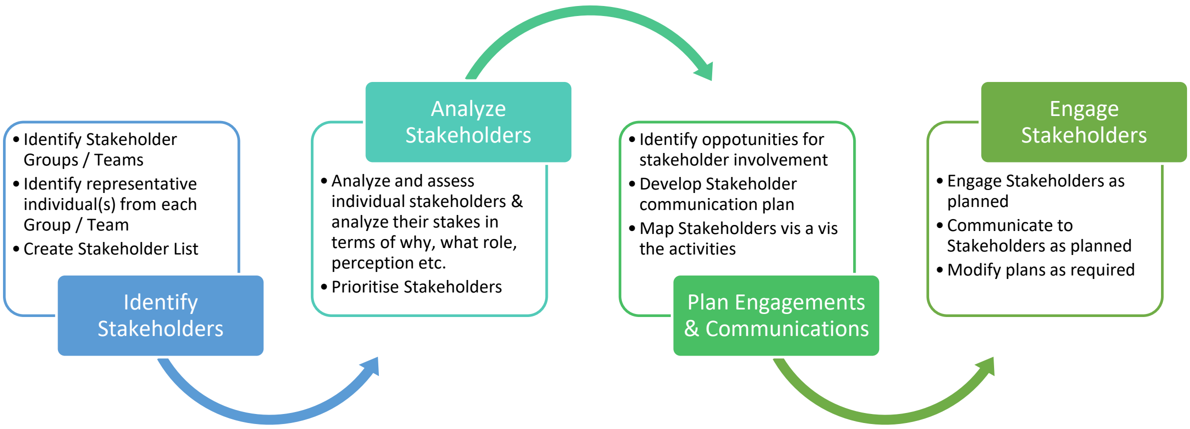
The purpose of this Law is to create legal conditions for the realisation of the right of every citizen to freely seek and receive information, as well as to ensure information openness in the activities of state bodies and rural self-government bodies. The Law regulates:

- Information to which access cannot be restricted
- Cases of refusal to provide information
- Modalities of realising the right of access to information
- Rights and obligations of the person requesting the information
- Obligations of bodies and organisations and their officials on access to information
- Request for information and the procedure for considering and granting a request
- Procedure for reimbursement of expenses for provision of information
- Appealing a refusal to provide information

3 Stakeholder identification, analysis and communication methods

3.1 Project Stakeholders

Project stakeholders are "people who play a role in the Project or who may be affected by the Project, or who have an interest in the Project". Project stakeholders can be grouped into primary stakeholders who are "...individuals, groups or local communities who may be affected positively or negatively by the Project and directly or indirectly"... especially... "those directly affected, including those who are disadvantaged or vulnerable" and secondary stakeholders who are "...broader stakeholders who may have the opportunity to influence the outcome of the Project through their involvement in the Project"... and secondary stakeholders who are "...those who may have the opportunity to influence the outcome of the Project through their involvement in the Project...". The PIUs operating under MEWR, along with the newly established PMGs, are central to the management and coordination of environmental and social engagement activities. Stakeholder engagement will be implemented at both national and regional levels through these structures.



ESS10 recognizes two broad categories of stakeholders: “Project Affected Parties” and “Other Stakeholders”. The latter includes “those who may be affected by the project due to actual impacts or potential risks to their physical environment, health, safety, cultural practices, well-being or livelihood. These stakeholders may include individuals or groups, including local communities”. These are the individuals or households most likely to experience changes as a result of the environmental and social impacts of the Project. The parties affected by the project are described below:

- Project Affected Persons (PAP) are individuals, groups and other organizations within the Project’s area of influence who are directly or indirectly, positively or negatively affected (actually/potentially) by the project, and/or have been identified as most susceptible to change, and relevant to the activities of the Project, and who should be directly involved in identifying impacts and their significance, and in making decisions about mitigation and management measures.

- Vulnerable groups are individuals who may be disproportionately impacted by a project(s) or who may be disadvantaged more than any other groups due to their vulnerable status, and who may require special engagement efforts to ensure their equal representation in consultations and decision-making related to the Project.

- Other Stakeholders (OIP) are individuals/groups/organizations who perceive or believe that their interests are affected by the project and/or who may in any way influence the outcome of the Project and its implementation process.

Identifying Project Stakeholders

Project stakeholders are defined as local authorities, government agencies, formal or informal groups and organizations, as well as individuals whose interests or rights will be affected by the Project, directly or indirectly, positively or negatively, who may have an interest in the implementation of the Project, and who may influence the results of the Project in any way.

The activities of the Project may impact a variety of stakeholders, ranging from government agencies, private sector, research sector, civil society and the general public. For the purposes of this SEP document, stakeholders who may be directly affected and involved in the implementation of the Project are classified as Affected Parties. These include, but are not limited to, local communities, women, poor and vulnerable individuals or groups.

Specific stakeholders for relevant activities will be considered during the implementation of the Project to ensure they are all identified and engaged, with particular attention to different vulnerable groups. Other stakeholders include, but are not limited to, regional and district authorities, government agencies, local businesses that may be involved in the Project in various ways, as well as civil society, international organizations, and the media.

Community representatives can provide useful information on the local context and act as the main conduits for the dissemination of Project-related information and as the main channel of communication between the Project and the target communities and their established networks. The legitimacy of such representatives may derive either from their formal elected status or from their informal and widespread position in the community that enables them to act as focal points for Project contacts. interaction with their stakeholders. Examples of legitimate stakeholder representatives include and are not limited to:

- elected officials of regional, local, village councils and self-government bodies;

- the chairmen waved;

- unelected leaders who are widely recognised in their community, such as chairpersons of local action groups, committees, local co-operatives, etc;

- leaders of community organisations, local NGOs and women's groups;

- religious leaders;

- teachers and other respected persons in local communities, etc.

The vetting of stakeholder representatives (i.e. the process of confirming their legitimacy and genuine advocates for the community they represent) remains an important task in reaching out to community stakeholders. The legitimacy of community representatives can be verified by communicating informally with a random sample of community members and taking into account their views on who can represent their interests most effectively.

3.2 Methodology for stakeholder engagement

3.2.1 Basic principles

In order to comply with best practices, the Hired Consultant, prior to the implementation phase of the project, will apply the following principles to stakeholders:

- Openness and life cycle approach: public consultations on the project will be organised for a fixed period of time to develop environmental and social documents, carried out in an open manner, without external manipulation, interference, coercion or intimidation;

- Informed participation and feedback: information will be provided and widely disseminated to all stakeholders in an appropriate format; opportunities are provided to convey stakeholder feedback, analyse and consider comments, and concerns;

- Inclusion and sensitivity: stakeholders are identified to better support communication and build effective relationships. The participatory process is inclusive. All stakeholders are always invited to participate in the consultation process. All stakeholders are given equal access to information. Sensitivity to the needs of stakeholders is a key principle underpinning the choice of engagement methods. Special attention is paid to vulnerable groups, in particular women, youth, older people, including different groups.

3.3 Stakeholder identification and analysis

The stakeholder engagement process in Tajikistan will start with identification, mapping and analysis. It is expected that this Stakeholder Engagement Plan (SEP) will help to clarify to stakeholders the identification procedure at the national level for the upcoming phases. This will help the Contractor to comply with the above commitments (national and international). The following criteria, adjusted for local specificities, are proposed to be used for stakeholder identification:

- Liability: project implementation or ongoing operations may result in legal, financial or other liabilities to the social group;
- Influence: the social group may have the ability to significantly influence project implementation or ongoing operations;
- Partnerships: there are opportunities to build partnerships between the project developer and this social group as part of the project implementation or ongoing operation;
- Dependence: the implementation of the project may significantly affect this social group, in particular it may affect the vital interests of its representatives if they depend on the project's ongoing operations economically or financially;
- Representation: A social group may have a right to representation in relation to a project or ongoing operations, and this right is legitimised by law, custom and/or cultural specificity;
- Expressed interest: a social group and/or individual may express interest in a project or ongoing operations, and this group is not necessarily directly affected by planned or ongoing activities.

Stakeholder group	Interaction interest	Potential impact of the project
	Local level	
Landowners	Receiving compensation for land used for PL construction	Loss of land, inconvenience during construction, possible reduction in land value
Residents living near the power line construction line	Ensuring safety, minimising noise and electromagnetic radiation	Health risks, discomfort, possible reduction in housing value
Farmers using fields for agriculture	Preserving soil fertility, ensuring access to water, minimising damage to crops	Loss of part of agricultural land, inconvenience during construction, possible reduction of crop yields

Table 2. General list of identified stakeholder groups

3.4 Categorisation of stakeholders

For the purpose of effective and targeted engagement, the stakeholders of the proposed project can be categorised into the following main categories:

- Affected parties - individuals, groups and other entities in the project's area of influence who are directly (actually or potentially) affected by the project and/or who have been identified as being most susceptible to project-related changes and who need to be closely monitored to identify impacts and their significance, and to make decisions on mitigation and management measures;

- Other Stakeholders - individuals/groups/organisations who may not be directly affected by the Project but who believe or are aware that their interests are affected by the Project and/or who may affect the Project and its implementation in some way;

- Vulnerable groups - people who may suffer disproportionately or are further disadvantaged by the project compared to any other groups because of their vulnerable status, and this may require special efforts to ensure their equal representation in the consultation and decision-making process related to the project(s).

Engaging with all identified stakeholders will help to ensure that stakeholders contribute as much as possible to the success of the project and allow the project to build on existing expertise, networks and programmes. It will also facilitate community and organisation endorsement of the project by the various parties. Access to localised knowledge and expertise is also made possible through the active participation of stakeholders.

3.4.1 Affected parties

Affected parties include local communities, community members and other parties that may be directly affected by the Project during construction activities. In particular, the following individuals and groups fall into this category:

- Communities in the vicinity of planned project activities;
- Local people and local communities;
- Residents, business entities and individual entrepreneurs in the project area who can benefit from employment, training and business opportunities;
- Government officials, including the project area administration, village administrations, and environmental protection authorities;

- Vulnerable status may be based on a person's or group's race, national, ethnic or social origin, colour, sex, language, religion, political or other opinion, property, age, culture, literacy, illness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.
- Community groups and non-governmental organisations (NGOs) representing and acting on behalf of local residents and other local interest groups; AND
- Employees and Contractor.

Local NGOs and human rights defenders represent a significant potential that could be realised by the project(s) assembler to disseminate information and raise awareness of planned activities among potentially affected communities in the project area. NGOs usually have well-established co-operation with local communities, are able to suggest the most effective and culturally appropriate methods, liaise based on local customary norms and prevailing means of communication, and have facilitator skills that can be utilised as part of project consultations. In addition, NGOs can help disseminate information about proposed projects to local communities, including in remote areas (e.g. by posting project information materials in their offices, distributing project information lists during events they organise) and providing space for interaction activities such as focus group discussions.

3.4.2 Other stakeholders

Project stakeholders also include parties other than the directly affected communities, including:

- Residents of other rural communities in the project area who can benefit from employment and training opportunities arising from the project;
- Civil society groups and NGOs at regional, national and local levels that have environmental and socio-economic interests and can become project partners.
- Organisations within this group are likely to be located outside the immediate project area;
- Business owners and suppliers of services, goods and materials in the project area who will be involved in the wider project supply chain or may be considered for the role of project suppliers in the future;
- Government of the Republic of Tajikistan - government officials, permitting and regulatory authorities at the national and regional levels.
- Media and related interest groups, including local, regional and national print and broadcast media, digital/network organisations and their associations.

3.4.3 Vulnerable groups

An important factor in achieving inclusiveness of the engagement process is to ensure participation of vulnerable persons in public consultations and other forms of interaction within the project. Vulnerability can be due to a person's origin, gender, age, health and financial insecurity, unfavourable status in society (e.g. minorities or marginalised groups), dependence on other people or natural resources, etc.

Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance to facilitate their participation in project-related decision-making. The main objective of this Plan is to ensure that the awareness and contribution of vulnerable groups to the overall process is commensurate with that of other stakeholders.

Vulnerable groups in the project impact area include:

- Elderly people and war veterans;
- People with disabilities;
- Low-income families dependent on government support;
- Female-headed households or single mothers with minor children;

- Unemployed.

A more detailed assessment will be carried out at an early stage of the Project and stakeholder engagement activities will be tailored to the needs of social groups who may be excluded on the basis of their belief, ethnicity, gender, social status or any other reasons. Discussions with low-income/disadvantaged groups affected by the project should be aimed at providing opportunities for basic on-site research into the potential social impacts of Project activities. Focus group discussions should be organized for vulnerable groups, taking into account their specific needs (if any) and suggestions received during the initial public consultation. To ensure that consultations with local communities include vulnerable groups, presentations will need to be conducted in Tajik, Uzbek and other languages (as appropriate) to make them more convenient for local community members. Communities in Project areas will be engaged to ensure that the needs of vulnerable households in the Project area are taken into account. Transportation services (if any) for vulnerable groups to participate in public consultations will be coordinated and decided by the participating municipalities.

Website and other social media channels of MEWR will be used for disclosure of project documentation, including SEP, updates and information about the Project, GRM of the Project in Russian / Tajik (local) language. In cases when access to Internet is impossible, traditional methods of communication will be used to inform and engage the vulnerable groups, for instance, personal meetings, focus group discussions, information desks / boards, distribution of leaflets. Further consultations for the purpose of identifying a final list of vulnerable groups under social impact assessment will be organized during the Project implementation.

The following mechanisms will be used for information disclosure to vulnerable groups:

1. Social and traditional media for any Project-related announcements. These include official websites of ministries, social media accounts (Facebook, Instagram, Telegram) and official newspapers.

2. Publication of all information about the Project, including GRM in Russian / Local language.

3. Conduction of public meetings, including workshops and seminars in a time and venue suitable for women; needs of disabled (if any) and obstacles faced by socially vulnerable groups of population must be taken into account. Often such meetings are convenient to hold at public places or women civil society organizations (if available).

4. Grievance redress mechanism

The primary objectives of the Grievance Redress Mechanism (GRM) are:

- Provide a clear, accessible, and transparent channel for addressing grievances related to Project implementation.
- Ensure that all grievances are resolved in a timely, fair, and confidential manner.
- Mitigate risks associated with social, environmental, and labor-related issues.
- Foster trust and collaboration among stakeholders by maintaining open communication and accountability.

An integral part of each Project's strategy is to inform and incorporate the views of Project affected communities and individuals. During Project implementation, stakeholders may have economic, social, environmental and other issues that need to be addressed by the Project. In accordance with World Bank ESS 10 requirements, the Project will implement a Grievance and Feedback Mechanism. The Grievance and Feedback Mechanism will be implemented as one of the main tools for social risk/conflict prevention. These mechanisms are necessary to ensure that Project stakeholders have the opportunity at all stages of Project implementation to submit their feedback in the form of grievances, suggestions for improvement of Project activities, or suggestions to correct problems at no cost and with the assurance of timely resolution. Effectively implemented GRM and feedback mechanisms will help to avoid litigation. Main objectives: obtaining prompt and objective information, review of appeals and their evaluation at all stages of project implementation, which are received from beneficiaries for further improvement of work.

The GRM ensures that all grievances are addressed in a timely and transparent manner. The following timeframes will be adhered to:

- Acknowledgment of receipt: within 3 working days.
- Initial review and categorization: within 7 working days.
- Resolution or referral to higher levels: within 15 working days, with a maximum of 30 days for complex cases.

Types of appeals: complaint/complaint, suggestion, request, positive feedback/gratitude. Appeals directly related to project implementation will be subject to review, where their compliance with eligibility criteria will be determined. The findings from GRM analysis will be reviewed during quarterly monitoring meetings. Key trends and recurring issues will inform adjustments to Project activities and mitigation measures to ensure alignment with stakeholder needs and expectations.

Each complaint must be tracked and evaluated, even if submitted anonymously. A parameter called "number of grievances filed and resolved" can be included as an indicator to measure the success of the project. This GRM has been designed in compliance with the World Bank's Environmental and Social Standard 10 (ESS 10) on Stakeholder Engagement and Information Disclosure. ESS 10 emphasizes the importance of effective engagement throughout the project lifecycle and the need for accessible grievance mechanisms to ensure inclusiveness and transparency.

Grievance channel	Description
Complaint and suggestion boxes	Grievance boxes installed in the jamoat and at the project site allow residents to submit their grievances in writing.
Contact telephone numbers	Appeals can be submitted by calling the contact phone numbers of the project representatives, which are indicated on the grievance box.
Oral or written communications during working meetings	Appeals can be received orally or in writing during on-site working meetings.

Incoming correspondence	Appeals can be sent through the inbox at the reception or via PIU email.
Web site	Grievances can be submitted through the project website, which provides an online feedback form.

Table1.Grievance channel

All grievances registered through the GRM will be analyzed quarterly to identify recurring issues and inform the development of enhanced mitigation measures. Findings will be reviewed during monitoring meetings and shared with stakeholders as part of the Project's commitment to transparency.

To enhance accessibility for all stakeholders, additional grievance submission options will be explored, including:

- Community Information Kiosks: Physical information points in project areas to educate communities about the grievance process and provide assistance in filing grievances.

Appeals can be both individual and collective. Consideration of complaints and suggestions is free of charge. All appeals will be recorded in a complaints and suggestions register. Complaints and feedback can be submitted anonymously and confidentiality will be ensured in all cases, including when the identity of the complainant/feedback is known. Information about the project and implementation will be posted on the websites of the implementing organizations, including quantitative data on complaints received and resolved. For wider awareness, the project will engage a consulting company for the entire project implementation period, which will conduct knowledge transfer and public awareness campaigns, implement the GRM and register appeals related to the project activities. In addition, their task will include familiarization of beneficiaries with the procedure for submission of appeals, production of information brochures, booklets and posters in Tajik, Russian and Uzbek languages, placement of information materials on stands/boards installed in each project jamoat. This technique is used for wider outreach and awareness of the local population about the work carried out by the project. Boxes will be installed for filing complaints, suggestions and other types of appeals. Below is the contact information where project beneficiaries can contact.
Contact information for submitting requests to the PIU To be developed during project implementation

The GRM process involves the following steps:

1. Submission: Grievances can be submitted through multiple channels, including grievance boxes, hotlines, email, and in-person meetings.
2. Acknowledgment: Each grievance will be acknowledged within 3 working days.
3. Review and Categorization: Grievances will be reviewed and categorized based on their nature and complexity within 7 working days.
4. Resolution: Simple grievances will be resolved at the local level within 15 working days. Complex cases may require escalation, with a resolution timeframe of up to 30 days.
5. Feedback: The complainant will be informed of the resolution and provided with an opportunity to appeal if dissatisfied.

Key performance indicators (KPIs) for GRM include the percentage of grievances resolved within specified timeframes, the number of escalated cases, and satisfaction rates of complainants based on follow-up surveys.

Level 1 (local). This level involves receiving grievances and other types of feedback that may be received as part of the implementation of infrastructure measures, i.e. construction/modernization works from the local community located in the project area, and includes the following steps:

Step	Action
Step 1: Receivemessages	Communications from the local community begin with contact with the local coordinator and/or NGO representative. The appeal can be transmitted through the local government representative (jamoat/mahalla), who informs the social counselor about the received appeal. The NGO registers and categorizes the appeal. If the appeal has the nature of a complaint

	and cannot be resolved by the local coordinator and/or NGO representative within 10 days, it is transferred to the next level. An entry is made in the register of complaints and suggestions about the resolution of the problem or about the referral to the next level. The following timeframes will be adhered to for grievance resolution: - Local Level: 10 calendar days for initial resolution attempts. - Regional Level: 15–20 calendar days for complex cases referred to this level. - National Level: Up to 30 calendar days for unresolved cases requiring further escalation. Timely updates will be provided to complainants at each stage.
Step 2: Filing a complaint with the PIU	The beneficiary shall submit his/her complaint in writing to the PIU. The grievance must be signed and dated by the complainant. The PIU social affairs specialist serves as the main contact point.The grievanceshouldbereviewedandresolvedwithin 15 days.
Step 3: Conflict Resolution Commission (CRC)	If the grievance is not resolved after receiving a response from the PIU, the Project uses the Conflict Resolution Commission as an appeal mechanism. The Conflict Resolution Commission consists of at least 5 members: 2 of which are PIU staff and the remaining three are represented at the level of Contractor's representative and local government representatives.

Table2.Grievancelevel

All grievances will be processed within clearly defined timeframes. The established deadlines for grievance resolution are as follows:

Grievances will be resolved within the following timeframes: 10 days at the local level, 15–20 days at the regional level, and up to 30 days at the national level.

The Conflict Resolution Commission is established at the request of the applicant, from the PIU or local Hukumat (in the districts of the project area). Decisions made by the Commission and agreed between all parties are formalized in the form of an order by the participating Hukumats. If the beneficiary has any objections to the CRC decision, the case can be taken to court by the affected party.

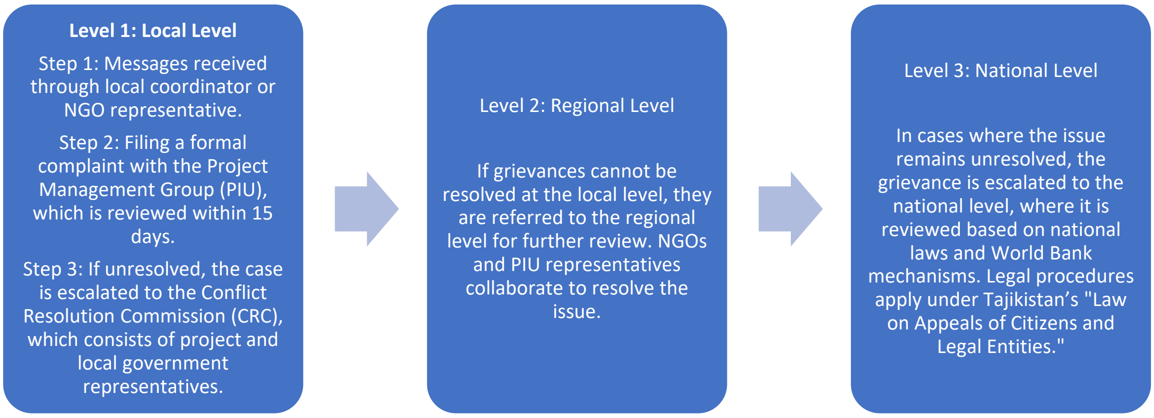
Level 2 (regional).

Step	Action
Level 2 (regional)	The review of applications submitted by stakeholders during project implementation is carried out with the involvement of NGOs and PIU representatives. At this level, applications that could not be resolved at the local level are reviewed. The process includes collecting and analyzing information about the application, meeting with the applicant and stakeholders, and making recommendations to resolve the problem. NGO representatives play an important role in providing independent assessment and advocacy for applicants, while PIU representatives coordinate the process and ensure that decisions are implemented. Decisions must be made and communicated to the applicant within a set timeframe, usually within 15-20 days. If the applicant is not satisfied with the decision, their application may be referred to the next level of review. At the regional and national levels, the GRM will operate in compliance with the Law of the Republic of Tajikistan on Appeals of Citizens and Legal Entities. This ensures that grievances unresolved at lower levels are addressed within the national legal framework. Collaboration with local Hukumats and NGOs will ensure that grievances are handled in a culturally sensitive manner, maintaining transparency and stakeholder trust. The PIU's social affairs specialist, in collaboration with the regional PMG staff, will be responsible for receiving, registering, and coordinating responses to grievances.

Table3.Grievancelevel

Level 3 (national).At the national level, the GRM aligns with the Law of the Republic of Tajikistan on Appeals of Citizens and Legal Entities. This ensures that grievances unresolved at regional levels are addressed within the legal framework of the country, maintaining compliance with both national and World Bank standards. This level will be based on the existing WB mechanism and national legislation, where, in accordance with the legislation of the Republic of Tajikistan, legal provisions reflected in the "Law of the Republic of Tajikistan on Appeals of Citizens and Legal Entities" are used. Within the framework of the Project implementation, information on the GRM for the Project will be placed on the websites of implementing organizations. The online feedback mechanism will also function as a GRM, allowing users to leave comments or submit complaints. Contact details of PIU will also be available on the websites. At the national level, grievances unresolved at regional levels will be addressed in accordance with the Law of the Republic of Tajikistan on Appeals of Citizens and Legal Entities. This ensures that all complaints are handled within the framework of national legislation, maintaining alignment with World Bank standards.

Grievance Redress Mechanism (GRM):



Key Performance Indicators (KPIs) for evaluating GRM effectiveness include:
- Number and types of grievances received.
- Percentage of grievances resolved within specified timeframes.
- Satisfaction rates of complainants, based on follow-up surveys.
- Frequency of recurring grievances and their resolution strategies.

If technical components are unavailable or of poor quality, the complainant can apply through a number of procedures: verbally (by phone), in writing, or during designated reception days and hours. Information on the reception schedule shall be placed on the information stand and published on the websites of the Executive Body. Applications related to the implementation of project activities are subject to review. Based on the application, a working committee for grievance resolution is established, which will be represented at the level of PIU responsible person (each in its specific work) and representatives of the Contractor/contractors. The timeframe for consideration and resolution of the grievance will be established in accordance with the provisions reflected in the Law on Appeals of Citizens and Legal Entities of the Republic of Tajikistan.

The GRM at local/regional/national levels will be finalized at the project inception stage and will be adjusted as necessary throughout the project life cycle. The GRM is closely linked with the Stakeholder Engagement Plan (SEP) and the Environmental and Social Management Plan (ESMP). For further details on stakeholder engagement activities, refer to SEP Section 5.1 "Collaboration methods and tools" and Subsection 5.1.1 "Description of interaction methods". For monitoring protocols and management measures, refer to ESMP Section 2 "Environmental and social management plan and monitoring plan». Grievance data, including types, frequency, and resolution status, will be analyzed quarterly and incorporated into the Project's semi-annual monitoring reports. This data will be used to identify recurring issues and improve Project implementation. Independent reviews of GRM functionality will be conducted every two years to assess its effectiveness and ensure compliance with World Bank standards. Findings from independent GRM reviews will be integrated into semi-annual reports, shared with stakeholders, and presented during consultations to ensure transparency and continuous improvement.

World Bank Grievance Redressal Service

Communities and individuals who feel that they are adversely affected by a World Bank (WB)-financed project may submit complaints to existing project-level grievance mechanisms or to the WB's Grievance Redress Service (GRS). The Grievance Redressal Service ensures that grievances received are promptly addressed to resolve project-related issues. Project-affected communities and individuals can submit their grievance to the WB's independent Inspection Panel, which determines whether harm has occurred or is likely to occur as a result of the WB's failure to comply with its policies and procedures. Complaints may be filed at any time after issues have been raised directly with the WB and Bank management has had an opportunity to respond. For information on how to file complaints with the World Bank's Corporate Complaint Management Service (CCMS), visit: https://projects.vsemirnyjbank.org/ru/projects-operations/products-and-services/grievance-redress-service#file

For information on how to file complaints with the World Bank Inspection Panel, visit: www.inspectionpanel.org

You can also send a complaint directly to the World Bank Tajikistan Country Office in Dushanbe. Address: 48 Ayni Str., Busin CES Center "Sozidaniye", 3rd floor, phone: 992 48 701-5810, e-mail: tajikistan@worldbank.org

5 Stakeholder Engagement Programme

5.1 Collaboration methods and tools

The project intends to utilise a variety of stakeholder engagement methods. In order for the engagement process to be effective and meaningful, a number of different methods need to be used, specifically tailored to the identified stakeholder groups. The methods used for consultation with officials may be different due to the format of engagement with local communities (focus group discussions, displays and visual materials with less emphasis on technical aspects).

The format of any consultation event should meet the general requirements of accessibility, i.e. should be held in locations that are easily accessible and do not require long commutes, admission fees or prior permission for access, cultural appropriateness (i.e. with due respect for local customs) and norms), and inclusiveness, i.e. inclusion of all sectors of local society, including persons with disabilities, the elderly, minorities and other vulnerable persons. Where necessary, logistical assistance should be provided to enable participants from remote areas, people with disabilities and people who lack the financial or transport resources to attend public meetings planned by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of customised techniques. As their vulnerable status may lead to uncertainty and unwillingness or physical inability to participate in large-scale community meetings, home visits to such individuals/families or holding separate small group discussions with them in an easily accessible location are ways of reaching vulnerable groups that are likely to be under-represented at community meetings according to their situation and capacity.

Regional PMGs, under the guidance of the PIUs, will facilitate local consultations, ensure participation of vulnerable groups, and implement the GRM system, including on-the-ground feedback collection, analysis and reporting.

5.1.1 Description of interaction methods

The project's stakeholder engagement will utilise a variety of engagement methods to ensure outreach and participation of different stakeholder groups: consultation, decision-making and development of impact management solutions.

International standards increasingly emphasise the importance of consultation being "free, prior and informed", which implies an accessible and unrestricted process, accompanied by the timely provision of relevant and understandable information. To fulfil this requirement, a number of consultation methods have been developed that specifically focus on this approach.

Information communicated prior to public consultation primarily includes announcement in the media - local, regional and national - as well as circulation of the invitation and full information about the upcoming meeting well in advance, including the agenda. It is essential that this information is widely available, easily accessible, clearly stated and reaches all areas and in particular the target communities.

These parameters can be achieved by implementing the following approach:

- Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available through publicly accessible places and channels. The primary means of notification may be through the media and distribution of posters/advertisements in public places. The project keeps evidence of publications (e.g. a copy of a newspaper advert) for reporting purposes. Existing community notice boards may be particularly useful for disseminating notices, e.g. on boards near widely frequented public spaces.

- post offices, chain shops, transport links and local NGO offices. When notices are posted on public outdoor billboards, it should be borne in mind that the posters are exposed to weather conditions, may be removed by passers-by or covered by other advertising.

Therefore, project staff will conduct regular checks to ensure that notices posted on public boards remain in place and legible.

- Another important aspect of the meeting preparation process is to choose communication methods that reach potential audiences with lower literacy levels or those who are not well versed in the technical aspects of what is being proposed. Oral communication is an option that makes it easy to convey information to such individuals. This includes engaging selected community representatives/local NGO organisations and action groups to pass on relevant information about the project and consultation meetings to other community members, advertising the project and related meetings on radio or television and making direct calls (if fixed or mobile phone connections are available) - another method to reach remote audiences. Announcing a public meeting or hearing is done in advance, thereby giving participants the opportunity to make the necessary arrangements and providing all necessary information, including date, time, location and contact persons.

- The public disclosure of project materials is also accompanied by a register of comments and suggestions, which can be used by any member of the affected community and subsequently made available to the general public on the feedback received. As a rule, the register is available for the entire period of information disclosure activities. If necessary, a project representative or designated Consultant should be available to receive and record any verbal feedback in case some stakeholders have difficulty providing written comments.

- Setting the agenda for the consultation meeting is an opportunity to provide a clear and detailed description of the structure of the meeting, the sequence, the chairpersons, the range of issues to be addressed, and the format of the discussion (e.g. presentation/demonstration followed by a Q&A session, facilitated small group work, thematic papers and experience sharing, free-format thematic sessions allowing for the exchange of ideas). A clearly defined range of issues to be addressed at the meeting gives potential participants the opportunity to prepare their questions and comments in advance.

It is very important to allow sufficient time for a final question and answer session at the end of any public meeting or hearing. This allows the audience to pass on their comments and suggestions, which can then be incorporated into project development. Keeping a record of all public comments received during consultation meetings will allow project staff to address stakeholder priorities. The recorded comments and how they have been incorporated into the project will be important material for inclusion in the project's regular reporting to stakeholders.

- Sending targeted invitations to a consultation meeting or hearing is an important element of the preparation process and is based on a list of participants that is compiled and negotiated prior to the consultation. Invitations can be sent both to individuals who have been specifically identified as relevant stakeholders (e.g. government representatives, leaders of local NGOs and action groups, village chairpersons) and to community groups (e.g. addressed to action and professional organisations, local organisations and other governmental organisations).

The text of individual invitations can be tailored to the specifics of the event, the invitees and their role in the process, while the text of public invitations usually provides general details.

Depending on availability and technical feasibility, the following means of dissemination may be used:

use: direct mail (post); as an inclusion in other existing public mailings, utility bills or distributed from a local authority. The invitation should normally contain a clear request for confirmation of attendance, indicating the date by which confirmation is expected.

All invitations sent are monitored for a response and to generate a list of participants. If no response is received, a phone call or email may be made after the invitation if possible.

PMG under PIU will use a range of methods to achieve the primary objective of its consultation activities, which is to raise community and stakeholder awareness of planned and ongoing project activities, and to obtain feedback from the community that can then be incorporated into project mitigation and enhancement measures. As discussed above, due consideration will be given to the cultural appropriateness and inclusiveness of the consultation environment, as well as gender and other sensitive issues that may prevail in local communities. The knowledge and advice that can be obtained from community representatives as well as local NGOs is essential to ensure that these aspects are fully respected. If necessary, separate meetings and focus group discussions will be held as described above.

A list of participants is provided at the beginning of the consultation/hearing to record all participants present at the meeting and their affiliation. Signatures of participants should be obtained as evidence of their participation. Details of participants who were not originally on the list (e.g. those participating instead of someone else, or an undetermined number of people) during the process of compiling the list of participants, but who came to the meeting should be counted on the list of participants.

In most cases, as a general rule, the introduction to a meeting or hearing should be presented in a format that can be understood by a lay audience and should not contain excessive technical terminology. Whenever possible, oral and visual methods of communication (including presentations, images, illustrations, graphics and animations) should be favoured, accompanied by handouts that convey relevant information in understandable terms rather than text filled with technicalities. If the technical features of the project design are to be presented at a higher level of detail, it will be ensured that the information conveyed remains comprehensible to all members of the audience and that the description of complex technical details is adapted to their level of understanding, thereby ensuring productive feedback and effective discussion.

If a large audience is expected to attend a public meeting or hearing, the necessary steps will be taken to ensure that the presentation and any demonstrations are audible and visible. This includes the provision of a microphone, adequate lighting, projector, wheelchair accessible seating, etc.

Keeping minutes of meetings is important for both transparency purposes and accuracy in collecting public comments. At least three methods of recording can be used:

- The taking of written minutes of the meeting by a designated person or secretary;
- audio recording (e.g. using dictaphones); and
- photography.

The latter should be used judiciously, ensuring that there is sufficient photographic evidence but without distracting the meeting from the agenda, and video recording can also be made. A combination of these methods ensures that the proceedings of the meeting are fully documented and that there are no significant gaps in the record that may be missed during face-to-face interactions with participants.

As a possible option, in addition to the question and answer session near the end of the public meeting/hearing, evaluation (feedback) forms could be distributed to participants to give them an opportunity to express their views and suggestions on the project. This is particularly useful for capturing individual feedback from people who may have refrained from expressing their views.

The questions provided in the evaluation form may cover the following aspects:

- Name and affiliation of the participant (these items are not mandatory if the participant prefers to submit the complaint/suggestion anonymously)
- How did they find out about the Project and the consultation meeting?
- Are they generally supportive of the Project?
- What are their main concerns or expectations/hope related to the Project or specific activities discussed at the meeting?
- Do they feel that the Project will bring any benefits to their community as a whole?
- Is there anything in the Project and its design decisions that they would like to change or improve?
- Do they feel that the consultation meeting was useful in understanding the specific activities of the Project and the associated impacts and mitigation measures? What aspects of the meeting did they particularly appreciate or would recommend improvement?

Given that some participants may find it difficult to complete the evaluation form due to illiteracy or concerns about their confidentiality, it should always be explained when feedback forms are handed out that completion of the form is optional. Some people may be willing to express their feedback verbally, in which case a project officer will be allocated to take notes.

A summary of the interaction methods and techniques to be used in the project are outlined in Table 2 below.

Table 2: Planned Stakeholder Activities Program vis-à-vis Project Cycle/Milestones

Project Milestone/Phase	Planned Activities	Engagement Methods	Target Stakeholders	Outputs/Outcomes
Project Initiation	Announcement of the project, initial information dissemination.	- Public announcements in media (newspapers, radio, TV). - Posters on community boards. - Targeted invitations (direct mail).	- General public. - Local communities. - Government representatives. - NGOs.	- Stakeholder awareness raised. - Attendance confirmations recorded.

Pre-Consultation (Scoping Phase)	Gathering stakeholder input on the scope and concerns of the project.	- Public meetings/hearings. - Focus group discussions. - Oral communication (radio announcements, direct calls).	- Local community representatives. - NGOs and action groups. - Vulnerable groups. - Authorities.	- Key issues identified. - Stakeholder register updated. - Minutes and Q&A recorded.
Design Phase	Presentation of project designs, mitigation measures, and alternatives; collecting stakeholder feedback.	- Visual and oral presentations (illustrations, graphics). - Handouts (simplified technical details). - Public meetings.	- Affected communities. - Local NGOs. - Technical experts. - Local authorities. - Women's groups.	- Feedback incorporated into project design. - Record of suggestions and decisions documented.
Pre-Construction Phase	Disclosure of finalized project designs, planned activities, and mitigation strategies.	- Distribution of project documents. - Focus group discussions. - Q&A sessions. - Public noticeboards and media.	- Local communities. - NGOs. - Local authorities. - Vulnerable populations.	- Awareness about project impacts and benefits enhanced. - Documented feedback for final design refinements.
Construction Phase	Monitoring impacts of construction, addressing grievances, and ensuring community participation.	- Regular community meetings. - Grievance mechanism (registers, verbal reporting). - Site visits and demonstrations.	- Affected communities. - Contractors. - Project management team. - NGOs.	- Grievances addressed. - Community concerns documented and resolved. - Progress reports shared.
Post-Construction (Operation Phase)	Review of project performance, benefits realization, and ongoing stakeholder interaction.	- Public meetings. - Monitoring and evaluation (surveys, feedback forms). - Performance review workshops.	- Local communities. - NGOs. - Project stakeholders. - Government authorities.	- Project benefits assessed. - Continuous feedback collected for improvement. - Performance reports.
Project Closure	Final consultation on project outcomes, lessons learned, and next steps.	- Feedback forms and public meetings. - Community workshops. - Reports on project impacts. - Audio-visual documentation.	- Local communities. - NGOs. - Authorities. - Broader public.	- Lessons learned documented. - Final stakeholder feedback recorded. - Closure reports disseminated.