

Government of Nepal

Ministry of Physical Infrastructure and Transport (MoPIT)

and

Ministry of Industries, Commerce, and Supplies (MoICS)

and

Ministry of Forests and Environment (MoFE)



Bangladesh-Bhutan-India-Nepal (BBIN) Multi-phase Programmatic Approach (MPA) Regional Transport and Trade Facilitation Program - Nepal Phase 1

Stakeholder Engagement Plan

March 25, 2022

Abbreviations

BBIN	Bangladesh-Bhutan-India-Nepal
CBOs	Community-based organizations
DoR	Department of Roads
ESCP	Environmental and Social Commitment Plan
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
IDA	International Development Association
IPs	Indigenous Peoples
LLG	Local Level Government
M&E	Monitoring and Evaluation
MoU	Memorandum of Understanding
NEFIN	National Federation of Indigenous Nationalities
MoPIT	Ministry of Physical Infrastructure and Transport
MoICS	Ministry of Industries, Commerce, and Supplies
OHS	Occupational health and safety
PCU	Project Management Unit
SEA/SH	Sexual Exploitation and Abuse, Sexual Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank

Contents	
Abbreviations	2
List of figures.....	4
EXECUTIVE SUMMARY	5
1. Introduction.....	7
2. Summary of previous Stakeholder Engagement Activities.....	13
3. Stakeholder identification and analysis	17
3.1 Project-affected parties.....	17
3.2 Interested parties	18
3.3 Disadvantaged/vulnerable individuals or groups	21
4. Stakeholder Engagement Program	24
4.1 Purpose of stakeholder engagement program	24
4.2 Principles of meaningful consultation.....	24
4.3 Proposed strategy for information disclosure.....	30
4.4 Reporting Back.....	32
5. Implementation arrangements	34
5.1 Organizational structure to implement the SEP	34
5.2 The roles and responsibilities of units/agencies and individuals	35
5.3 Estimated Budget	37
6. Grievance Redressal mechanism (GRM).....	41
6.1 Objectives of the GRM	41
6.2 Grievance implementation procedure	41
6.3 Grievance Redressal Mechanism (GRM) System.....	41
6.4 Key steps and procedures of the GRM System.....	42
6.5 GRM in COVID-19 Crisis	45
6.6 Use of the Existing Dispute Resolution Systems	46
6.7 Grievances About GBV	46
6.8 GRM for Workers	47
7. Monitoring and Reporting	48
7.1 Monitoring of Stakeholder Engagement Activities.....	48
7.2 Alternative means of monitoring and reporting in COVID-19 crisis.....	48

7.3 Reporting of Stakeholder Engagement Activities	49
Annex 1 - Sample Grievance Form	52
Annex 2 - Sample Grievance Registration Template.....	53
Annex 3 - Sample Grievance Closure Form	54

List of Tables

Table 2.1: Previous stakeholder engagement activities	13
Table 3.1: Other interested parties and their interests in the project	19
Table 4.1: Plan for Stakeholder Engagement	26
Table 4.2: Proposed strategy for information disclosure	30
Table 5.1: Roles and Responsibility of Related Units/Agencies	35
Table 5.2: Roles and Responsibilities of Individual/expert	36
Table 7.1: Performance Indicators	49

List of figures

Figure 1.1: Location of Butwal – Goringhate- Chauraha Road Section in Nepal.....	9
Figure 5.1: E&S Implementation Arrangements of BBIN 1	35
Figure 6.1: GRM system.....	42
Figure 5.2: Key steps and procedures	45

EXECUTIVE SUMMARY

The Bangladesh-Bhutan-India-Nepal (BBIN) Multi-phase Programmatic Approach (MPA) Regional Transport and Trade Facilitation Program aims to support the efficient and resilient movement of goods and people across the borders of Nepal and along the East-West Highway on the western side, which is key to access India's western seaports for enhanced economic growth. Under Phase 1 of the program, Nepal will implement transport and trade facilitation activities. The Department of Roads (DoR), under the Ministry of Physical Infrastructure and Transport (MoPIT), is the implementing agency for transport and road-related activities, the Ministry of Industries, Commerce, and Supplies (MoICS) will implement the trade-related activities, while the Ministry of Forests and Environment (MoFE) will lead the development and implementation of green resilient highway concept and strategy. Each of the Ministries will constitute Project Coordination Units (PCUs), led by a Project Director, to implement the project activities at their respective ministries. The PCUs will play a leadership role and provide day-to-day support to the project implementation.

This Stakeholder Engagement Plan (SEP) is prepared in line with the World Bank's Environmental and Social Standard 10 (ESS10) to promote timely disclosure of relevant project information to project stakeholders, guide meaningful consultation with local communities and enable constructive dialogue between MoPIT/DoR, MoICS, and MoFE as implementers on one hand, and road users, transport entrepreneurs, project-affected persons, local communities, traders, workers, and other relevant stakeholders on the other. The SEP consolidates ongoing consultation activities with these stakeholders and establishes a systematic approach to identify and engage project stakeholders and ensure meaningful consultation with the stakeholders in the design and implementation of the project. For this purpose, MoPIT/DoR, MoICS and MoFE first identified the project stakeholders and categorized them into various groups based on their interests and influence on the project. The SEP includes an analysis of project stakeholders and proposes strategies for engaging them throughout the project life. The SEP also makes provision for engaging indigenous people (IPs) and vulnerable groups, such as Dalits, present in the project area and to inform them about the risks, impacts and opportunities associated with the project along with the measures that the project aims to adapt to mitigate adverse impacts and enhance development outcomes of the project.

The organizational arrangements for implementing stakeholder engagement activities are discussed in section 5 of this SEP. At the national level, the DCID-DoR, which is responsible for the implementation of the road-related works, will lead the implementation of the SEP, including management of project-related grievance redress mechanism (GRM), information disclosure, and consultation activities. Similarly, MoICS will be the implementing agency for the trade-related works and will be responsible for the implementation of the

activities envisaged in the SEP at the federal level. Most of the trade-related activities are geared towards reforms with implications for stakeholders who can be reached at the national and provincial levels.

At the activity level, the project site offices for the road project will lead the implementation of SEP activities and help to uptake and address project-related grievances. Both the DoR and MoICS have staff who work with past and existing World Bank funded projects and are familiar with the World Bank's E&S requirements. In the case of activities on green resilient highway concept, provincial level project implementation units of the MoFE will be responsible for implementing the SEP relative to these activities.

The SEP also outlines a two-tiered grievance redress mechanism (GRM) for the project with provisions for receiving grievances, processing, finding resolution, and reporting back to complainants in a timely and culturally appropriate manner. The GRM includes a sequential escalation procedure of complaints if the complainant remains unsatisfied with the resolution and seeks to appeal. Where necessary, the SEP can be revised periodically to adapt to changing project circumstances, thus enabling the project to take corrective measures. Further, this SEP includes measures to ensure that stakeholder consultation activities can be conducted with considerations for avoiding or minimizing the threat of COVID-19 transmission as prescribed by the government and the World Bank.

1. Introduction

The BBIN Regional Transport and Trade Facilitation Program —Phase 1 (Bangladesh and Nepal) is an eight-year World Bank-funded project under the Multiphase Programmatic Approach (MPA) comprising of 2 phases and is designed to improve the conditions for trade and transport in Bangladesh and Nepal by augmenting infrastructure, technology and processes for regional transport and trade facilitation. It is expected that the project will improve trade and transport in the sub-region by developing efficient and resilient regional trade and transport. Under Phase 1 of the MPA, the Nepal program comprises four components as outlined below:

- **Component 1: Digital Systems for Trade**

This component will support the adoption and implementation of digital and automated systems for the improvement of Nepal's cross-border clearances. The new systems will provide Nepal with an efficient cross-border data-sharing tool, reduced touch points and human interface, enhanced transparency and faster border clearance times. They will also contribute to a greener infrastructure development, including decreased GHG emissions, by reducing the use of materials, truck idling, and travel of government officials and traders. Specifically, it will support the following sub-components:

- (a) Sub-component 1A – Development of an Integrated Automated Border Management System (ABMS), including electronic cargo tracking system.
- (b) Sub-component 1B – Development of a Statistical Management Software System and Risk Engine.
- (c) Sub-component 1C – Development of a web-based supply Management Information System (MIS) for automation of registration processes and permits.

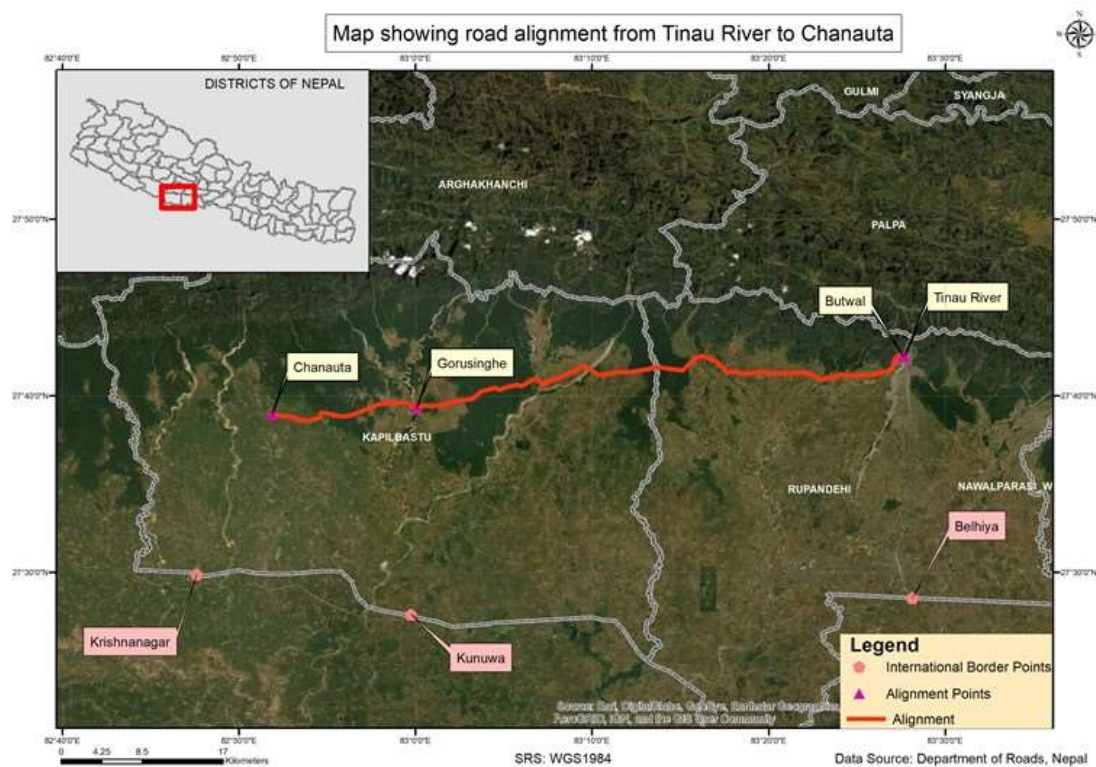
- **Component 2: Green and Resilient Transport and Trade Infrastructure.**

This component will support the development of climate-resilient transport infrastructure along Nepal's primary domestic and international trade corridor connecting Nepal with the other BBIN countries, i.e., the East West Highway (EWH). Specifically, it will finance:

- (a) Sub-component 2A – Upgrading of Butwal-Gorusinghe-Chanauta Road Section.
- (b) Sub-component 2B – Design and Construction of a Green Resilient Urban Bridge.
- (c) Sub-component 2C – Development and Implementation of a Green Resilient Highway Concept and Strategy.

- **Component 3: Institutional and Policy Strengthening for Transport and Trade.** This component will support the strengthening of policies, institutions, and technical capacities as well as the development of mechanisms necessary for improving Nepal's transport and trade facilitation governance. Specifically, it will finance key strategic agreements, reforms and capacities, as follows:
 - (a) Sub-component 3A – Support for Implementation of the Bangladesh-India-Nepal Motor Vehicle Agreement (MVA).
 - (b) Sub-component 3B - Support for Customs Reforms.
 - (c) Sub-component 3C – Implementation of Private Sector Support Initiatives.
 - (d) Sub-component 3C – Implementation of Private Sector Support Initiatives.
 - (e) Sub-component 3E – Support for Future Projects Preparation.
- **Component 4: Contingency Emergency Response** (CERC) (US\$0 Million) will support unforeseen emergency needs. In case of a major natural or human made disaster, GoN may request the Bank to re-allocate project funds to this component to support its quick response and reconstruction. Disbursements under CERC are contingent to three conditions: (i) GoN has determined that an eligible crisis or emergency has occurred and the Bank has agreed and notified the government; (ii) the Ministry of Finance has prepared and adopted the Contingent Emergency Response (CER) Implementation Plan that is agreed with the Bank; and (iii) GoN, through the Project Implementing Unit, has prepared, adopted, and disclosed safeguards instruments, as per the Bank's guidelines, for the eligibility of the CER Implementation Plan's activities.

Figure 1.1: Location of Butwal – Gorusinghe- Chanauta Road Section in Nepal



The Ministry of Physical Infrastructure and Transport (MOPIT) and the Ministry of Industries, Commerce and Supplies MOICS will be responsible for implementing the transport and trade components respectively. Component 1 (Trade Facilitation) will be managed by a PCU under MoICS, in coordination with designated units in the agencies responsible for implementation. Similarly, the components 2(excepting sub-component 2c) and 3 will be managed by a PCU in the Development Cooperation Implementation Division (DCID), within the DoR under MOPIT, in coordination with designated units in the agencies responsible for the implementation of various sub-activities. Component 2C will be implemented by the Ministry of Forests and Environment (MoFE).

The PCUs to be established at the MoICS and the DoR for the implementation of the project in Nepal will oversee the day-to-day administration of the project activities, including, (i) the management of designated accounts, (ii) financial management and reporting, (iii) execution of the audit of the project, (iv) preparation of quarterly financial and bi-annual progress reports, (v) management of the environmental and social safeguards aspects, and (vi) undertaking all procurement and contract management activities. The PCUs will be headed by full-time Project directors and be staffed with full-time technical experts and specialists in the areas such as project management, procurement, financial management, environmental, health and social aspects, among others. The PCU will also consider hiring a Project Implementation Services Consultants as and when required.

Whilst the project will extend overall positive benefits, the implementation of some project activities is expected to induce notable environmental and social impacts. Based on preliminary environmental and social risks review, the World Bank determined the environmental and social risks of the project as “substantial”. Key environmental impacts which may emerge from the construction of infrastructure (especially during the construction phase) include removal of trees/natural vegetation to make way for project infrastructure, solid waste management, building retaining and breast walls to protect the slope against landslides and air and noise pollution during construction. Similarly, main social risks and impacts which may result from the project include the potential for land acquisition and displacement of local people, including indigenous community and marginalized people, including Dalits, temporary restriction and/or disruption of access to homes, businesses and common property resources, occupational and community health and safety (during construction) and impacts on cultural heritage.

In addition, there is the potential for exacerbating marginalization of the poor and vulnerable groups, particularly people with disabilities, indigenous and lower-caste groups such as Dalits in terms of access to project information and benefits. Illiteracy, poverty and predetermined low social status among these groups can limit their participation in project activities, constrain their access to project benefits, and undermine the objectives of the project.¹ The World Bank’s Environmental and Social Standards and relevant national laws and regulations of Nepal will provide the legal and operational framework for assessing and managing the risks and impacts highlighted above.²

1.2 Stakeholder Consultation and Information Disclosure

In line with the World Bank’s ESS 10, this Stakeholder Engagement Plan (SEP) has been prepared to facilitate and guide meaningful consultations with local communities about the risks and impacts of the projects and proposed mitigation measures, promote timely disclosure of relevant project information to project stakeholders, and enable constructive dialogue between the concerned government agencies, including Ministry of Physical Infrastructure and Transport (MoPIT), Department of Roads (DoR), Ministry of Industry, Commerce and Supplies (MoICS), project-affected households, local communities, transport and road users and other relevant stakeholders. Using processes and procedures outlined in the SEP, the MoICS and MoPIT/DoR intends to disclose relevant information (including its

¹The detailed environmental and social risks and impacts of the project are noted in the World Bank’s Environmental and Social Risks Review Summary of the project.

² Based on the ESRS (see footnote 1), the World Bank Standards that are relevant for managing environmental and social risks under the project include ESS1: Assessment and management of environmental and social risks and impacts; ESS2: Labor and working conditions; ESS3: Resource Efficiency and Pollution Prevention and Management; ESS4: Community health and safety; ESS5: Land acquisition, restriction of land use and involuntary resettlement; ESS6: Biodiversity conservation and sustainable management of living natural resources; ESS7: Indigenous People/Sub-Saharan African Historically Underserved Traditional Local Communities; ESS8: Cultural heritage; and ESS10: Stakeholder engagement and information disclosure.

environmental and social risks and impacts) about the project to relevant stakeholders and to solicit their perspectives, views and concerns that can be integrated in project design, planning, and implementation. The SEP consolidates previous engagement activities which have been carried out by the implementing agencies as part of the project preparation and outlines a series of strategies for further consultation and engagement of relevant stakeholders throughout the project lifecycle, making sure that such consultations are transparent, meaningful, and effective enough to inform project design, generate community support for the project, and inform inclusive and responsive design and implementation.

For the purposes of this SEP, stakeholders, as defined in the World Bank ESF, 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* ') and include individuals or groups whose interests may be affected by the project and who have the potential to influence the project outcomes in any way. The SEP is a "living document" and will be updated and refined as the project progresses.

1.3 Objectives of the SEP

The objectives of this SEP are:

- To identify relevant stakeholders of this project and assess their interest and potential influence on the project
- To ensure that all relevant project stakeholders receive relevant information in an inclusive and culturally appropriate manner, thereby enabling their support and/or participation in the project implementation process
- To outline a responsive and functioning Grievance Redress Mechanism (GRM) that is readily available to project-affected parties to lodge project-related complaints and concerns and to allow the project to respond to and manage such grievances
- To provide means for effective and constructive and inclusive engagement with project-affected parties and other interested parties throughout the project lifecycle on issues that could potentially affect them and,
- To ensure that appropriate project information on environmental and social risks and impacts and the proposed mitigation measures are disclosed to stakeholders in a timely, accessible, and appropriate manner and format.

As a part of project preparation, the PCUs at the MoICS, DoR and MoFE have identified key stakeholders that will be directly or indirectly affected by the project; carried out preliminary engagement with some of these stakeholders and outlined ways by which they can share information with stakeholders, consult them in a meaningful way, and enable stakeholder participation and feedback to project implementation process. This SEP

summarizes the findings of the analysis and describes the timing and methods of engagement with stakeholders throughout the life cycle of the project.

2. Summary of previous Stakeholder Engagement Activities

Preliminary consultations have carried out engagements with various key institutional and community stakeholders including federal government ministries, authorities of provincial and municipal authorities, Road development agencies, Divisional Forest Authorities, and Forest User Groups. Through these engagements, the government disclose early project concepts and objectives, noted their ideas, suggestions and concerns which are being used to inform the project design. Table 2.1 below summarizes key engagements and issues discussed at the local level.

Table 0.1: Previous stakeholder engagement activities

Stakeholder/date of engagement	Issues Discussed	Key points raised by stakeholders
Environmental agencies, NGOs and Municipal level consultation <i>October 25 to 30 December, 2021</i>	<ul style="list-style-type: none"> • Project design and planning • Universal access • Road safety • Management of public utilities • Public awareness • Coordination between line agencies • Protection of cultural artifacts and heritage • Construction plan and work schedules • Management of RoW and beautification 	<ul style="list-style-type: none"> ▪ Provision of overhead bridges (sky bridges) and underpass to reduce road accidents and easy access on either side ▪ Construction to be carried out by dividing the entire road section into small parts which would help in reducing the pollution. ▪ Telephone and electricity wires to be undergrounded if possible. ▪ The project should be sensitive to the occurrence of likely social distortion during road construction and should implement public awareness program ▪ The project should be started in coordination with the concerned agencies regarding the existing structures related to electricity, drinking water, telephone, sewerage, and irrigation ▪ The project should be completed within a fixed period. ▪ Proper provisions of CCTV and traffic lights on the roads ▪ As there is Lumbini Sajedhari/Tilaurakot Collaborative Forest in this area, arrangements should be made to use the forest produce collected in Lumbini Sajedhari Forest ▪ The project will have to reconstruct the Buddha statue, waiting for station and other structures near the Lumbini entrance gate within the road section. ▪ The project should help in controlling the floods with the proper provision of drains on either side of the road from Geruwa, Bangai to Koili Bridge. ▪ When constructing roads between urban areas and settlements, certain types of

		<p>pollution-preventing plants should be planted.</p> <ul style="list-style-type: none"> ▪ A powerful deity temple, Jhadulamai, lies along the roadside hence, construction work needs to be done with its preservation and protection. ▪ Barbed wire fence along roadside should be reconstructed by contractors after demolishing them ▪ Ownership of harvested trees should be granted to respective forest user groups ▪ Construction of Gabion around high Embankment and unstable area and landslide prone areas ▪ Roadside plantation should be restored after its removal for road extension ▪ Construction of wildlife corridor for easy wildlife passage on both side of road ▪ Filing material required for road construction should not be extracted from the community forests ▪ Land stabilization activities should be done in Chure region considering its senility during excavation ▪ Need to prepare cross drainage structure (Box culvert, bridge) wildlife friendly in Jungle area height and width, and need certain interval ▪ Gaida lake is near the project area there is Vulture restaurant
<p>Ward and Municipal Level Consultations Jan 1-15, 2022,</p>	<ul style="list-style-type: none"> • Project concept, components, and objectives • Project implementation arrangements • Key environmental and social issues related to the project • Tariffs, access, and cost recovery 	<ul style="list-style-type: none"> • Construction work to be carried out only after infrastructures like; water pipelines, electricity wires and poles, telecommunications wire, canals, drains etc., which exist along the roadside, to be managed and shifted accordingly after consulting with respective organizations. Also, there shouldn't be any hindrances in the water supply during the construction phase. • The facility of cross drainage management and replacement of old worn-out Hume pipes with new culverts to facilitate excess water flow. • Landslide prone area hence adequate study to be carried out before carrying out construction work.

		<ul style="list-style-type: none"> • Should come up with ideal plan in regards of minimizing pollution during the construction phase of project. • Different types of environmental pollution may generate as a result of various road construction activities (especially air pollution), which should be mitigated with appropriate measures. The bituminous road must be demolished at the end period to prevent air pollution. • Skill development programs related to livelihood should be conducted for the locals. • Construction work to be carried out by adopting safety measures. • Local people from the project-affected settlement should be given priority prioritized in terms of providing employment in the project activities based on their skill, qualification, and capability. • As there is Mayadevi Stadium in the western part of Banganga Bridge and Shanti Udyan in the north, it should be properly managed and action plan should be made to maintain local identity and pride. • Construction of sewage channel to prevent water flooding in residential areas • Construction of pavements to connect roadway with major picnic spot • Need to prepare cross drainage structure (Box culvert, bridge) wildlife friendly in Jungle area height and width, and need certain interval • For removal of roadside tree need to follow Government trees clearance criteria 2071 (2014 AD) (Number 4 and 10). • For compensatory plantation need to follow 1:10, compensatory cost needs to include in project cost
--	--	--

Given the prolonging COVID-19 situation and the restrictions on travel and gathering, the PCU was unable to share the draft of the SEP with wider stakeholders and get their feedback. However, the PCU is committed to sharing the draft SEP with the identified stakeholders of the sub-projects and making appropriate revisions based on feedback and concerns before the implementation of the project. In addition, the PCU also consult with the vulnerable groups, such as Dalit and IP communities to apprise them about the SEP, incorporate their appropriate concerns and feedback and engage them in the process of implementing the SEP.

3. Stakeholder identification and analysis

This section provides information about key stakeholders – both affected and the interested parties - that have been identified and will be informed and consulted about the project, including individuals, institutions, interest groups, and local communities. Indigenous people as well as vulnerable and disadvantaged groups in the project locations have also been identified, recognizing the existing limitations on the ability of such groups to access relevant project information and the opportunities that may come through the project. These stakeholders were identified using the following criteria:

- **Dependency:** individuals or groups significantly dependent on the project or ongoing operations, and who stands a chance of being further affected by the proposed project in economic, financial, or utility terms.
- **Representation:** Individuals or groups with the right to be represented in the project or ongoing operations, and this right is legitimated through legislation, custom and/or cultural specifics.
- **Influence:** Individuals or groups who may be able to substantially influence the project planning, implementation, or ongoing operations.
- **Liability:** Project implementation or ongoing operations may result in legal, financial, or other liabilities of the project to a social group or specific individuals.
- **Partnership:** There are opportunities for building partnerships between the project and a given social group or specific individuals during project implementation and/or operation.
- **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 the planned or current activities

The limitations of Covid-19 and the need to operate safely imposed constraints on the ability of the project team to travel, identify and engage stakeholders. Nonetheless, the team conducted a few field visits and drew on secondary data and previous experience to map out and analyze the interest of various stakeholders in the project across federal, provincial, and local government levels.

3.1 Project-affected parties

They include individuals, groups, and entities within the project's Area of Influence, which is set as the area within the 150 meters each side from the central line of the proposed road, that may be directly impacted by the project activities and/or have been identified as most susceptible to the change associated with the project. So, the project-affected parties need to be closely engaged in identifying impacts, as well as in decision-making on mitigation and management measures. They include:

- Local populations living or public service providers located within the area of 150 meters each side from the central line of the proposed road and may be adversely affected mainly by noise, dust, vibration, and the vehicular movements that will be used for the construction activities,
- Persons or households who may lose temporary or permanent access to land and/or will be restricted from accessing natural resources because of the project, e.g., farmers, landowners, informal settlers, forest user groups, etc.
- Indigenous and vulnerable groups, such as Dalits, elderly, physically and mentally disabled persons, landless people, single mothers, adolescent girls, minority communities, and the children,
- Local health centers would have to provide basic health supports to the project staff and migrant workers.
- NGOs working in the area on environmental and social issues and the media

3.2 Interested parties

The interested parties in this project, other than those directly affected, include:

- Government officials (elected and non-elected), regulatory, and permit awarding agencies at the federal, provincial, and local levels, including environmental, technical, and labor authorities.
- Government officials at District level offices of key ministries, including Divisional Forest Offices, Irrigation Offices, Road Offices, Survey Office, Land Revenue Offices, and Electricity Authority, etc.
- Non-elected officials with wide recognition within the community, such as headteachers of local schools, religious leaders, or leaders of local cooperatives
- Leaders of informal or traditional community institutions such as women groups, Dalits Samaj, local transporters' association, Local transport workers' association, consumer groups, village councils, etc.
- NGOs and CBOs at national, provincial, and local levels on the welfare and rights of indigenous people and vulnerable groups such as Dalits and other minorities, gender/GBV issues, etc.
- Business owners, traders, suppliers of goods and services to the construction and operation of the project
- Residents and communities within the project area that can benefit from increased economic opportunities, employment, and training opportunities stemming from the project; and,
- Media including district and local press clubs.

Table 3.1: Other interested parties and their interests in the project

Interested parties	Interest in the project
International Level	
Environmental I/NGOs and Activists, NGOs working on IPs and Human rights, Gender Activists	<ul style="list-style-type: none"> Understanding the range of impacts of the project activities and effectiveness and implementation of the prescribed mitigation measures along with the opportunities associated with the project(s).
Private Corporations	<ul style="list-style-type: none"> Explore business opportunities in PPPs on infrastructure development and investment
Development partners and Agencies (DPs)	<ul style="list-style-type: none"> Explore opportunities for scaling the project investments, e.g., ADB, USAID, JICA, Due diligence and compliance on environmental and social impacts Project management and scalable lessons.
Academics and researchers	<ul style="list-style-type: none"> Possible research work at the project site to provide scientific knowledge of the risks, impacts and opportunities of the project.
Federal Level	
Ministry of Finance, National Planning Commission,	<ul style="list-style-type: none"> Ensuring that project funds will be used for project purpose. ensuring that project investments align with national and local level development priorities (15th Periodic Plan)
Federal Ministry of Forest and Environment	<ul style="list-style-type: none"> Trees clearance for project site development and management for compensatory tree plantation
Department of Urban Development and Building Construction	<ul style="list-style-type: none"> Preparation a provincial Master Plan for the project area and thus needs project-related information.
The Federation of Nepali National Transport Entrepreneurs (FNTE) - the umbrella organization representing transporters	<ul style="list-style-type: none"> Quality and the safety of the road New transport features to be introduced in the road once it is open for operation Possible road obstruction in the operation of the vehicles during the construction period
National NGOs with focus on E&S Gender issues, IPs and Dalits right issues	<ul style="list-style-type: none"> Represents the interests of different interested parties and vulnerable groups
Workers' organizations	<ul style="list-style-type: none"> Interest in potential E&S risks as well as community health and safety, including occupational health and safety of the project workers

Contractors, subcontractors, and service providers	<ul style="list-style-type: none"> • Procurement and contracting opportunities associated with the project • Providing services for and on behalf of the project e.g., skills development training for workers, pump operators, labor supply contractors, etc.
Media	<ul style="list-style-type: none"> • To provide information and news about the project to their listeners, • Accountability for project/public funds • represents public interest
Academic institutions such as universities and think tanks	<ul style="list-style-type: none"> • Research/study opportunities for the students on various issues such as techniques of modern road construction, associated E&S risks and impacts, labor influx. etc
Project/Site Level	
Provincial Social Development Ministry	<ul style="list-style-type: none"> • Social impacts (positive and negative) of the project activities and contribution to the social development by the project • Community representation in transport facility management
Provincial Economic Affairs and Planning Ministry	<ul style="list-style-type: none"> • Contribution to the economic development by the project
Provincial Planning Commission	<ul style="list-style-type: none"> • Economic development and development planning in transport
Provincial Ministry of Industry, Tourism, Forest and Environment and District Forest Office	<ul style="list-style-type: none"> • Possible impact to the forest, tree clearance and management of compensatory tree plantation
Political leaders (i.e., Chief Ministers, Political Party Heads, Mayors	<ul style="list-style-type: none"> • Taking credits of economic and social development in the region
Provincial and local level NGOs, Right Groups, Activists,	<ul style="list-style-type: none"> • Represents the interests of different interested parties and vulnerable groups • Road safety and accessibility to disabled people, quality of construction, E&S risks management procedures during construction
Provincial Ministry of Physical Infrastructure Development and District Road Office	<ul style="list-style-type: none"> • Traffic management during the road construction • Implementation of the project by managing potential E&S risks and impacts
Chambers of commerce and business associations	<ul style="list-style-type: none"> • Business opportunities unveiled by the project activities • Possible obstruction in transporting goods during construction of the road

Mass Media (FM/community radios, newspapers, TV channels, social media, including the Facebook and twitter, among others)	<ul style="list-style-type: none"> • To provide information and news about the project to their listeners, • Accountability for project/public funds • represents public interest • local correspondence for national and international networks
---	--

3.3 Disadvantaged/vulnerable individuals or groups

The project implementing agencies recognizes that it is important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups that are often unable to express their concerns or not in a position to react to the impacts due to various social barriers or may not even understand the impacts of a project. The vulnerability may stem from an individual's gender, race, age, health condition, ethnicity or caste, education and income levels and other elements of marginalization. The stakeholder engagement activities in this project will consider these elements of vulnerability and deploy strategies such as periodic disclosure of information in a way comprehensible to local communities and meaningful consultations in a culturally appropriate manner to ensure that the disadvantaged and vulnerable individuals fully understand the potential impacts and mitigation measures of the project. The project will also take special measures to ensure that disadvantaged and vulnerable groups can participate in accessing project benefits, provide feedback, and submit grievances. These groups may include and are not limited to the following:

- The elderly, especially those living alone
- Individuals with chronic diseases and pre-existing medical conditions
- Minority groups including Dalits and Muslims (see table 3.3 below)
- Indigenous peoples and groups
- Female-headed households
- Poor households including homeless and landless families
- Survivors of gender-based violence (GBV), sexual exploitation and abuse, sexual harassment (SEA/SH)
- People with disabilities; and,

As the project progress, vulnerable groups within the affected community will be further confirmed, included, and consulted with, as necessary. Where the SEP is used to address IPs, it will be prepared in a manner consistent with ESS7 to enable targeted meaningful consultation, culturally appropriate engagement processes; providing sufficient time for IPs decision making processes; and allowing their effective participation in the design of project activities or mitigation measures. Against these, the project will:

- give priority to vulnerable family members to provide skills development training and on successful completion would provide jobs on a priority basis,
- create and ensure jobs for women-headed households as well as low-income families and persons with disabilities.

Table 3.3. Analysis of issues related to Disadvantaged/Vulnerable Groups

Project component	Vulnerable groups and individual	Key Characteristics /Needs	Preferred means of Consultation/Information disclosure	Additional Resources Required
Component 1. Digital Systems for Trade				
To support the transformation of the cross-border clearance ecosystem in Bangladesh and Nepal through the provision of digital and automated systems	Entrepreneurs and traders who are physically challenged or visually impaired, persons with visual and hearing impairment	<ul style="list-style-type: none"> • Remote Distance, Poor Communication network • Lack of access to meeting venues, long distance to communal meeting points, language barrier, visual impairment 	<ul style="list-style-type: none"> • Meetings/for a with trade groups, • Community notices • Local radio • Media 	<ul style="list-style-type: none"> • Information folders, brochures, use of notice boards, use of local political and social networks to disseminate information to remote areas • Information translated to indigenous languages, sign language/ braille
Component 2. Green and Resilient Transport and Trade Infrastructure				

Project component	Vulnerable groups and individual	Key Characteristics /Needs	Preferred means of Consultation/Information disclosure	Additional Resources Required
<ul style="list-style-type: none"> • To support resilient infrastructure development along regional corridors and associated border points that serve as the backbone for the physical and economic integration in the BBIN sub-region. 	<ul style="list-style-type: none"> • People with physical disabilities and visual impairment • Forest User Groups (usually Dalits and other minorities) • Female-headed households, Women, girls, poor and disadvantaged children pregnant school age girls 	<ul style="list-style-type: none"> • Accessibility, lack of information, limited voice • Cultural and traditional barriers poverty stigma 	<ul style="list-style-type: none"> • Identify/locate meeting points closer to households, • More information dissemination through the local radio, Group discussions, pictorial posters, local language skits and discussions. • Focus group meeting, use of gender champions, 	<ul style="list-style-type: none"> • Engagement of local NGOs and CBOs who work with vulnerable people at the community level to help disseminate information and organize consultation • Engagement of local NGOs and CBOs who work with vulnerable people at the community level to help disseminate information and organize consultation

4. Stakeholder Engagement Program

4.1 Purpose of stakeholder engagement program

The stakeholder engagement program is designed to establish an effective platform for productive interaction with potentially affected parties and others with interest in the preparation and implementation of the project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for the project to:

- Inform the stakeholders of the project related information especially issues that could potentially affect them in a timely, understandable, accessible, and appropriate manner and format,
- 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,
- Building and maintaining a constructive relationship with various stakeholders that have been identified,
- Provide project-affected persons with accessible and inclusive means to raise issues and grievances and allow the project to respond to and manage such grievances.

4.2 Principles of meaningful consultation

To meet the overall objectives of the SEP, the MoICS, DoR and MoFE will apply the following principles to ensure meaningful engagement with stakeholders:

- **Openness and life-cycle approach:** Activities related to stakeholder engagement, public consultations, and disclosure of project-related information will be conducted throughout the project lifecycle in a transparent manner, free of external manipulation, interference, coercion, or intimidation
- **Informed participation and feedback:** Information will be provided to and widely disseminated among all stakeholders through appropriate means and format to ensure maximum assessment of the stakeholders to the project-related information. Opportunities will be provided to stakeholders for their feedback and comments on information related to the project, and appropriate mechanisms will be put in place to address appropriate comments and concerns
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The project will ensure that the participation process would be inclusive, and all the stakeholders are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Special attention is given to indigenous people, vulnerable groups especially children/students of both gender, women, Dalits, and the elderly, and to the cultural sensitivities of diverse ethnic and caste groups.

Table 4.1 presents an outline of key stakeholder engagement activities to be implemented throughout the project life: preparation to implementation and closure.

Table 4.1: Plan for Stakeholder Engagement

Topic of consultation / message	Target Stakeholders	Method(s) of Engagement ³	Frequency/time frame	Responsibilities
Project Phase: Planning and preparation				
At the Federal Level <ul style="list-style-type: none"> • The objectives and scope of the project • E&S principles policies and scopes • The potential E&S risks and impacts and ESMF • ESIA process on Butwal-Gorusinghe road • Stakeholder consultations and information disclosure • Grievance Redress mechanisms (GRM) • SEH/SH risks and impacts, including draft SEA/SH Action Plan 	<ul style="list-style-type: none"> • Federal government line agencies/officials • Provincial government line agencies/officials • Rural Municipalities and concerned officials • National level NGOs with focus on road quality and safety • Road users • Road contractors • Exporters and importers • FNCCI and Businesses • Entrepreneurs and workers • Media 	<ul style="list-style-type: none"> • Phone, call centers, emails, official communication letters • Orientation/training workshops • Virtual meetings (One-on-one/Group discussions) • Brochures • Meetings with contractor unions 	Throughout the project preparation	PCUs

³All face-to-face meetings and gatherings will be conducted by adopting COVID-19 related protocols

<p>At the project/site levels</p> <ul style="list-style-type: none"> • Objectives and the planned activities of the project • E&S principles policies and scopes • Planned engagement and consultation with stakeholders • The potential E&S risks and impacts and ESMF • Information about the mitigation measures and implementation modality, • Stakeholder consultations and information disclosure • Establishment and functioning procedures of GRM • Citizen Engagement Activities • GBV and SEA/SH risks and impact, including the SEA/SH Action Plan and management procedures • All activities to ensure access of all the beneficiaries, including the IP and vulnerable groups • Program to ensure equity and quality of services and 	<ul style="list-style-type: none"> • Affected individuals (project users/beneficiaries) • District Coordination Committees (DCCs) • Transport entrepreneurs and workers • Businesses and traders • Local communities • Vulnerable groups including women's groups and Dalits • Indigenous peoples • Local NGOs with expertise on road quality and safety • Local press and media • Community leaders 	<ul style="list-style-type: none"> • Virtual one-on-one or group meeting • Periodic stakeholder engagement activities • Periodic project-related information disclosure • meetings with local municipalities • FGDs with stakeholders • Targeted outreach activities and FGDs with women, IP organizations and other vulnerable groups, such as Dalits • Regular contacts through phone and text messages with representatives of project • Community radio, social media, and local media 		<p>DoR at provinces and project site office at the local levels</p>
---	--	--	--	---

Topic of consultation / message	Target Stakeholders	Method(s) of Engagement ³	Frequency/time frame	Responsibilities
Project Phase: Implementation				
<ul style="list-style-type: none"> • Project scope and ongoing activities, and project status • Revision/updates of ESMF and other E&S instruments • Implementation of mitigation measures • Functioning of the GRM • Periodic stakeholder consultations and related activities • Project-related information disclosure • Other potential E&S concerns 	<ul style="list-style-type: none"> • Federal government line agencies/officials • Provincial government line agencies/officials • Municipalities and Rural Municipalities and concerned officials • Transport entrepreneurs and workers • Businesses and traders 	<ul style="list-style-type: none"> • Phone, call centers, email, letters • Face-to-face/virtual meetings with federal, provincial, and local agencies and officials • Orientation Program/ Training/workshop • Regular information updates on the websites of MoICS, DoR and MoFE. 	Throughout the project implementation	MoICS, DoR and MoFE at the federal level
<ul style="list-style-type: none"> • Project scope and ongoing activities, • Status of ESMPs, RAPs, and other instruments • Progress in implementing construction impacts including OHS measures • Updated SEP and related activities • Jobs and hiring process 	<ul style="list-style-type: none"> • Affected individuals (project users/beneficiaries) • Local communities • Vulnerable groups • Indigenous peoples • Local NGOs • Local community leaders • Local press and media 	<ul style="list-style-type: none"> • Periodic consultation with project stakeholders • Information disclosure through mass meetings, brochures, flyers, project website and local media, among other • Accessible and functioning GRM • Periodic small groups meetings with vulnerable and IP groups 	Throughout the project implementation	DoR at provinces and project site office at the local levels District Forest Offices of MoFE.

Topic of consultation / message	Target Stakeholders	Method(s) of Engagement ³	Frequency/time frame	Responsibilities
<ul style="list-style-type: none"> • GRM implementation • Implementation of SEA/SH Action Plan • Periodic stakeholder consultations • Project-related information disclosure • Other potential E&S concerns 		<ul style="list-style-type: none"> • Application of audio/visual communication techniques, and other accessible formats to engage with vulnerable groups, including people with disabilities 		
<ul style="list-style-type: none"> • Understanding perception of beneficiaries about the activities and services provided by the project 	<ul style="list-style-type: none"> • All targeted beneficiaries of subprojects 	<ul style="list-style-type: none"> • Beneficiary Satisfaction Survey 	First survey after two years of project implementation and the second during the final year of operation	DoR

4.3 Proposed strategy for information disclosure

All relevant documents of the project, including the ESMF, SEP, ESCP, and ESRS, among others, will be disclosed and made accessible to all stakeholders. The information will be disclosed through all possible means, ranging from face-to-face and virtual consultations with the project stakeholders, distribution of hard copies, posters, leaflets, and brochures, through social media, MoICS/DoR/MoFE and project websites and local media so that the documents are accessible to all project beneficiaries of the project, including those in residing in the remote areas.

Table 4.2: Proposed strategy for information disclosure

Target stakeholders	List of information to be disclosed	Methods and timing proposed activities ⁴
Project preparation phase		
Government officials (Federal, provincial, District Coordination Committees (DCCs) and other district-level government agencies and project hosting municipalities and rural municipalities, including ward offices)	<ul style="list-style-type: none"> • Project concept and planned activities • Environmental and Social Commitment Plan (ESCP) • The ESMF and the SEP • GRM process • SEA/SH management procedures • Revised and updated project information 	<ul style="list-style-type: none"> • Group consultation • Training, seminar, and workshop • Electronic publications • Information leaflets and brochures • Cluster meetings with provincial authorities • MoICS, MoFE and DOR websites
<ul style="list-style-type: none"> • Private and public transport workers • Local NGOs and CBOs • Community leaders • National & local Media 	<ul style="list-style-type: none"> • Project concept and planned activities • E&S management plans (i.e., highlights of ESMF, SEP, ESIs, etc) • GRM procedure, • SEA/SH management procedures, and • Revised project information. 	<ul style="list-style-type: none"> • Face-to-face or virtual meetings, webinars • Telephone calls, emails, and SMS • Seminar and workshops • Information boards, leaflets, and brochures • Regularly updated project information on the MoICS, MoFE and DoR websites
<ul style="list-style-type: none"> • Individuals and communities with a focus on vulnerable groups, including, IPs, women, and Dalits • Forest User Groups • Local NGOs and CSOs 	<ul style="list-style-type: none"> • Project concept and activities • E&S procedures and management plans • Updated SEP, GRM procedures, ESMF and ESCP, and 	<ul style="list-style-type: none"> • Regular release of public notices through mass media, community radio, television, and social media in Nepali as well as local language

⁴All face-to-face meeting will be conducted by adopting COVID-19 related protocol

	<ul style="list-style-type: none"> • Revised project information 	<ul style="list-style-type: none"> • Regular updates of information on the MoICS, MoFE and DoR websites • Distribute information leaflets and brochures to public • Air project information/ messages through community radio in Nepali and other local languages • Periodic small group meetings with vulnerable and IP groups • Regular contacts with the representatives of IP and vulnerable groups through phone calls, emails, text messages <p><i>(All face-to-face meeting will be conducted in a small group by adopting COVID-19 related protocols)</i></p>
Project implementation phase		
Government representatives (Federal, provincial, District Coordination Committees (DCCs) and other district-level government agencies and project hosting municipalities and rural municipalities, including ward offices)	<ul style="list-style-type: none"> • Scope of project and status of planned and ongoing activities • Regular updates on project status including the implementation of ESMF, SEP and GRM 	<ul style="list-style-type: none"> • Sharing project update and reports through emails and meetings • Electronic publications as well as dissemination of hard copies • Virtual consultations with provincial authorities • Virtual/face-to-face consultations with local municipalities and ward offices
<ul style="list-style-type: none"> • Private and public transport workers • Local NGOs and CBOs • National & local Media 	<ul style="list-style-type: none"> • Scope of project and related activities • Periodic updates on project status, including the 	<ul style="list-style-type: none"> • Information boards, • Project websites • Project leaflets and brochures

	implementation of ESMF, SEP and mitigation measures • GRM procedures	• Periodic face-to-face/virtual meeting with project stakeholders • Distribution of electronic publications, and • Dissemination of hard copies (Information will be provided in Nepali and local languages)
• Individuals and communities with a focus on vulnerable groups, including poor and ethnic minorities, IPs, women • Local NGOs and CSOs	• Scope of project and related activities • Periodic updates on project status, including the implementation of ESMF, SEP and mitigation measures • GRM procedures	• Public notices • Press releases in the local media and on the project website • Information leaflets and brochures • Airing messages through community radio, • Exchange of information through emails, text messages, use of audio-visual materials • Periodic small group meetings with vulnerable and IP groups by adopting COVID protocols • Regular contacts through electronic means, such as phone calls, and emails, text messages • Information sharing from local level offices <i>(Information will be provided in Nepali as well as local languages as needed)</i>

4.4 Reporting Back

The project recognizes that enabling stakeholders to understand whether the feedback they provided during consultations has been received considered during project design and implementation are important factors to build trust with the community. Reporting back to stakeholders helps demonstrate that the project seriously takes suggestions, comments and complaints raised by the local community and if/how these have been incorporated and addressed into the project. Understanding stakeholder concerns and addressing these early in

the project design and before implementation can help to avoid any project issues during implementation and can help to secure consensus for the project from key stakeholders. The project will adopt the following mechanisms to manage stakeholder feedback and comments, and to report back to the stakeholders:

- The project will ensure that feedback and comments received through comments boxes, online platforms in the social media, project email, and dedicated telephone numbers are acknowledged by registering them in a logbook and will be addressed in an appropriate and timely manner.
- A periodic review of the implementation of the SEP will continue to incorporate new issues that have come to light, and concerns and queries raised by the stakeholders during the project implementation. It will also provide information on how the feedback has been considered and addressed by the project.

5. Implementation arrangements

This section explains the institutional arrangement that the project aims to adopt for the effective implementation of the SEP.

5.1 Organizational structure to implement the SEP

Federal level: The overall implementation will be under the oversight of the Ministry of Physical Infrastructure and Transport (MoPIT) in coordination with the Ministry and Finance (MoF) and Ministry of Industries, Commerce and Supplies MoICS. Component 1 (Trade Facilitation) will be managed by a Project Coordination Unit (PCU) under MoICS, in coordination with designated units in the agencies responsible for implementation. Components 2 and 3 will be managed by a PCU in the Development Cooperation Implementation Division (DCID), within the DoR under MoPIT, in coordination with designated units in the agencies responsible for the implementation of various sub-activities. Similarly component 2c activities will be implemented by the MoFE.

Given that the project has a road and trade section, the activities related to road at the federal level will be implemented by DoR, and trade-related works will be implemented by the MoICS. To ensure effective implementation, both the sections will have their own PCU and the Development Cooperation Implementation Division (DCID) in the DOR will act as the PCU, while a new PCU will be established in the MoICS. Given the nature of environmental and social risks related to some of the activities, the PCUs at DoR and MoICS will hire environmental and social staff for implementation of the ESMF, hire environmental and social consultants to prepare the required E&S instruments, and contractors with adequate environmental, health and safety (ESHS) specialists for implementation of the subprojects. MoFE will assign focal persons to assume lead roles in ensuring that relevant stakeholders are informed and consulted on all activities related to the scoping, development and implementation of the green resilient highway concept and strategy.

The PCUs will be tasked with the responsibility of managing designated accounts, financial management and reporting, executing the audit of the project, preparing quarterly financial and bi-annual progress reports, managing E&S safeguards aspects, and undertaking all procurement and contract management activities. As stated earlier, the PCUs at various Ministries will recruit dedicated Social Development Specialists who will assume the overall responsibility for effective implementation of the SEP, monitoring consultation activities, and reporting quarterly on the implementation of the SEP and other social management plans. The Social Development Specialists will be supported by Environment Safeguard Specialists who will lead the implementation of the environmental impact assessment and management of environmental issues.

Project Level: The project site office of the road section will be responsible for the implementation of consultation activities, managing project-related complaints and grievances, and supporting community mobilization efforts of the project. The project site office will recruit a dedicated E&S specialist to be responsible for the implementation of the planned

activities in this SEP and the E&S specialist will be responsible for managing E&S issues of the project at the local level, with technical support and guidance from the social staff at the PCU. In addition, the E&S specialist will also serve as the focal persons for the GRM Level 1 at the local level. In addition to providing monthly SEP implementation and status reports to the social staff at the PCU, the E&S specialist will also be responsible for reporting and helping to manage sensitive incidents, such as grievances related to SEA/SH to the Social staff at the PCU and DoR. The staffs to be recruited at the PCU and project site office will be trained by the World Bank in collaboration with the PCU/DoR on the management of project-relates E&S risks and impacts. The organizational structure will be reviewed periodically to ensure the effectiveness of SEP implementation.

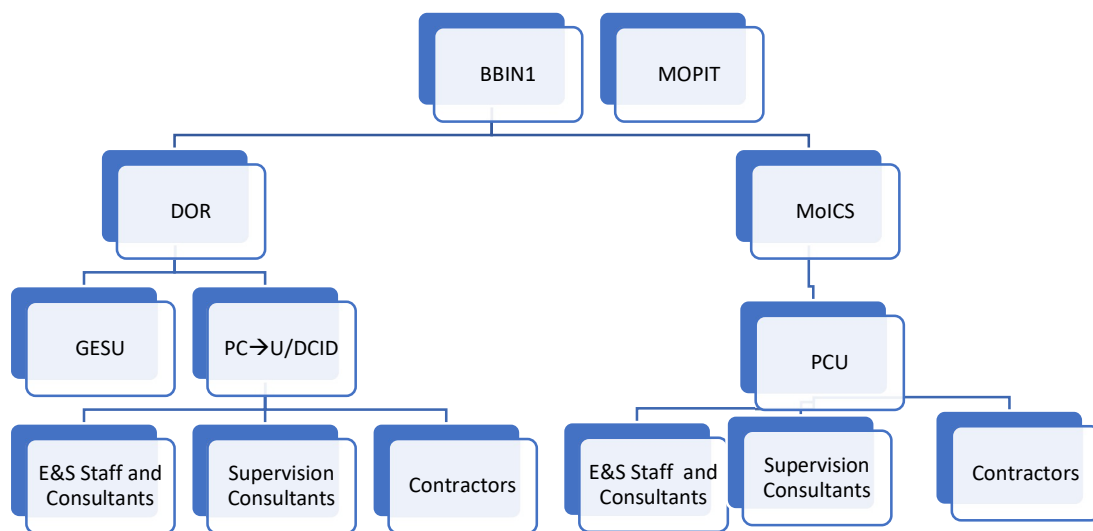


Figure 5.1: E&S Implementation Arrangements of BBIN 1

5.2 The roles and responsibilities of units/agencies and individuals

The roles and responsibilities of key agencies/units envisaged for the implementation and operation of the project (especially as they related to stakeholder consultation and engagement) are shown in the table below.

Table 5.1: Roles and Responsibility of Related Units/Agencies

Key units/agencies	Roles and responsibilities
PCUs at DoR, MoICS and MoFE	<ul style="list-style-type: none"> Planning, budgeting, and ensuring the implementation of the SEP throughout the project lifecycle. <ul style="list-style-type: none"> Coordinate and monitor SEP activities with the partnering municipalities. Collating SEP-related activities from the partnering municipalities along with their performances and outcomes.

	<ul style="list-style-type: none"> ○ <i>Undertaking periodic monitoring of SEP, and preparation and dissemination of quarterly SEP implementation report.</i> • Ensuring necessary financial and human resources at all three levels for effective implementation of the SEP and other E&S management plans. • Ensuring the project activities as per the various guidelines and directives issued by the government and other related organizations, including Covid 19 management protocols. • Ensuring effective management and reporting of project-related complaints and grievances as per the project GRM.
Project site office (DoR for road section) District Forest Office/MoFE	<ul style="list-style-type: none"> • Lead the implementation of stakeholder consultation activities at the community level • Supporting the PCU in identifying stakeholders of the project at the local level and updating the list of stakeholders. • Mobilizing and organizing local stakeholders for consultation and project engagement activities. • Disseminating project-related information in a timely manner. • Managing and ensuring the smooth functioning of the Level-1 GRM. • Reporting (monthly) on SEP and GRM to PIU
Host/Local community	<ul style="list-style-type: none"> • Participate in consultations and information disclosure programs • Provide feedback on project related documents disclosed for public scrutiny • Use GRM to report any grievances and complaints

Table 5.2: Roles and Responsibilities of Individual/expert

Key staff/expert	Responsibilities
Project Director (PCU- DoR)	<ul style="list-style-type: none"> • Responsible for monitoring and supervising the overall implementation of the SEP, including managing financial resources and supporting logistics, and preparing and disseminating quarterly SEP implementation reports.
Project Director (PCU- MoICS)	<ul style="list-style-type: none"> • Responsible for monitoring and supervising the overall implementation of the SEP, including managing financial resources and supporting logistics, and preparing and disseminating quarterly SEP implementation reports.
Project Director (PCU-MoFE)	<ul style="list-style-type: none"> • Responsible for monitoring and supervising the overall implementation of the SEP, including managing financial resources and supporting logistics, and preparing and disseminating quarterly SEP implementation reports.
Social Development staff (PCU- DoR Road section)	<ul style="list-style-type: none"> • Responsible for the overall implementation of the SEP, including periodic consultations, information disclosure, and effective functioning of the GRM. • Coordinate the SEP activities among the provincial agencies and Local Levels.

	<ul style="list-style-type: none"> • Updating the SEP to accommodate any changes and take corrective actions immediately as and when required. • Preparing quarterly SEP implementation report and submit to the Word Bank office through the PCU
E&S Specialist (Project site office – DoR Road section)	<ul style="list-style-type: none"> • Support the PCU in the implementation of the SEP • Hold periodic consultations with stakeholders, including IP communities and vulnerable groups and prepare meeting minutes. • Disseminate project-related information to the local-level stakeholders through available means • Receive and acknowledge grievances and maintain a logbook/electronic database of grievances and status. • Support the local municipalities to ensure smooth functioning of Level- 1 grievances. • Report on the status of grievances to the Social Development Specialists at the PCU at DoR and forward unsolved grievances to Level 2. • Provide data and field-level information related to SEP implementation activities to the Social Development Specialist of the PCU at the DoR. • Support E&S Safeguard Specialists to prepare quarterly SEP implementation reports as required.

5.3 Estimated Budget

A tentative budget for implementing activities related to Stakeholder Engagement Plan (SEP) over the period of five years that covers the planning and preparation, and project implementation phases is provided in the table given below. The PCUs at the DoR, MoICS and MoFE will review this plan half-yearly to determine if any changes to stakeholder classification or engagement are required. If required, the plan will be updated, and the budget items and budget will also be revised accordingly.

Table 5.3: Activities and estimated budget for 5 Years

Item	Quantity	Unit Cost (US\$)	Total Cost		Remarks
			US\$	NRs (@ 120 per US\$)	
Periodic stakeholder consultations - Meetings/workshops/FGDs ((hiring of venues, refreshments etc.))	30	75	2250	270, 000	2 consultation meetings in a year in each 3 sub projects for 5 years
Individual and group consultations	-	Lump sum	500	60, 000	As and when demanded/required for five years
Logistical support for IP, Dalits, and other vulnerable groups for attending consultations	-	Lump sum	200	24,000	As and when demanded/required for five years
Documentation of stakeholder activities and quarterly reporting	20	30	600	72, 000	Four documentations and reporting in each year in each subproject for 5 years
Sub-total			3550	426, 000	
Development of communication tools, methods, and materials (Newspaper advertisements, brochures, leaflets, information booklets, posters, display boards, websites etc.)	-	Lump Sum	1500	180, 000	for each 3 sub-projects for 5 years
Development of community radio and TV programs	-	Lump sum	700	84, 000	for each 3 sub-projects for 5 years
Awareness raising programs, resources & resource persons	3	50	150	18, 000	per year for each 3 sub-projects for 5 years
Sub-total			2350	282, 000	
Meetings, documentation, and record keeping/databases and reporting	20	30	600	72, 000	Four documentations and reporting in each year in each subproject for 5 years
GRM implementation monitoring	-	Lump sum	500	60,000	As required for five years

Training and orientations for staff on GRM management	3	500	1500	180, 000	One in a year for each subproject for five years
Sub-total			2600	312, 000	
Internal monitoring	15	200	3000	360, 000	One in a year for each subproject for five years
Report preparation	20	30	600	72,000	Four reporting in each year in each subproject for 5 years
Citizen Engagement activities	10	300	3000	360, 000	Two in a year for each subproject for five years
Beneficiaries Satisfaction Survey	2	2500	5000	600,000	Two surveys, the first one will be in between 2-3 years of implementation and the second one will be at the end of implementation
Sub-project			11,600	1,392, 000	
Other		Lump Sum	1000	120, 000	Estimated for five years
Sub-total			1000	120,000	
Grand total			21, 100	1,232,000	

6. Grievance Redressal mechanism (GRM)

The project will put in place a responsive and functioning Grievance Redressal Mechanism (GRM) to address concerns and complaints of beneficiaries and project stakeholders by adopting an understandable and transparent process that is culturally appropriate and readily accessible to all the segments of affected communities. The project's GRM will be operationalized by the various PCUs at no cost to complainants and guarantees that there will be no retribution for people who lodge complaints on project activities. Furthermore, the grievance mechanism will not impede access to judicial and administrative remedies.

6.1 Objectives of the GRM

The objectives of the GRM are

- Provide affected people with avenues for lodging complaints or resolving any dispute that may arise during the project lifecycle.
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- Avoid the need to resort to judicial proceedings as far as possible.
- In the case of indigenous people and vulnerable people, adopt culturally appropriate and accessible means by which they can lodge complaints about redress through their customary dispute settlement mechanisms.

6.2 Grievance implementation procedure

The project will develop a written grievance procedure/manual in consultation with project impacted parties and stakeholders. It will incorporate the following steps.

- Means and ways to inform and educate stakeholders about GRM procedures
- Receive, register, and acknowledge the grievance.
- Review and investigate the grievance
- Develop resolution or escalate the grievance
- Report back on the grievance, and
- Implement, monitor, and evaluate the functioning of the GRM.

6.3 Grievance Redressal Mechanism (GRM) System

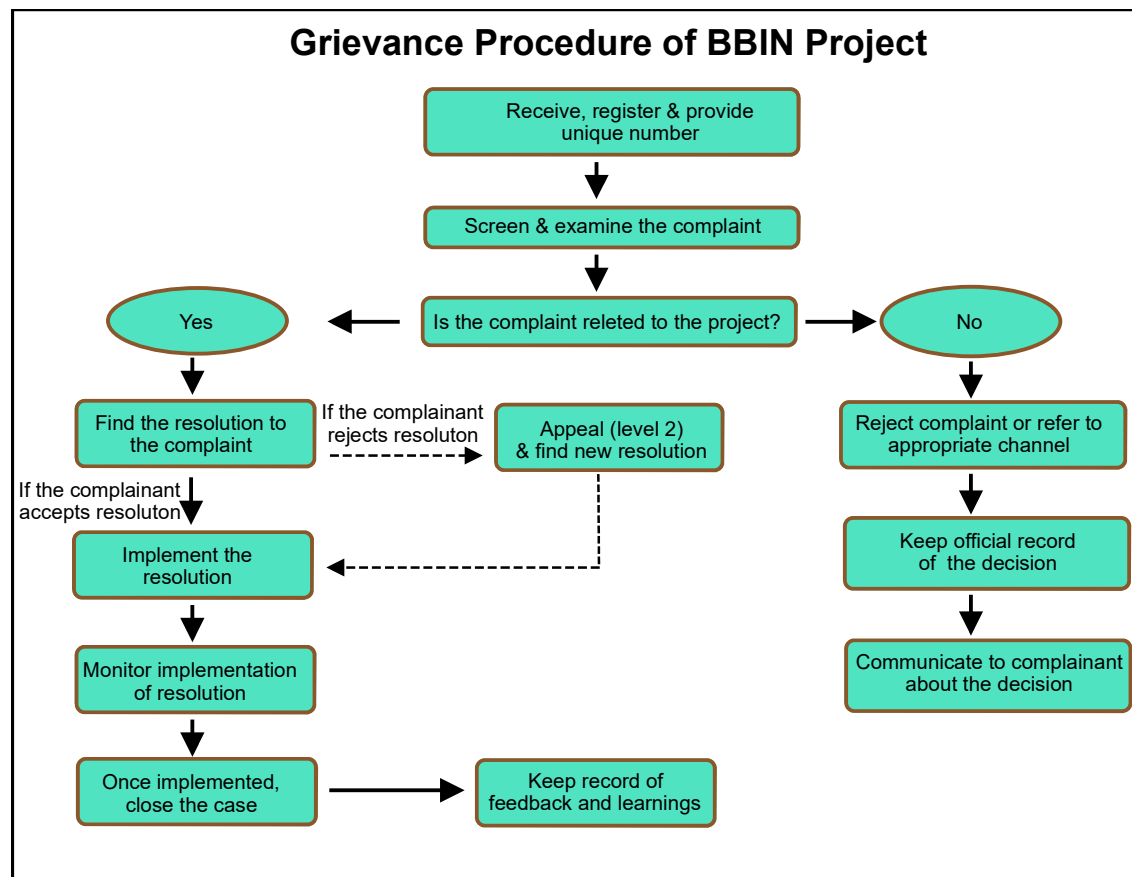
The main purpose of this system is to ensure there is a robust and transparent process, consisting of a sequential process of resolution available to swiftly address the complaints. A subsequent level of resolution is triggered if the complainant remains unsatisfied with the resolution made by the lower level or if it remains unable to provide a resolution within a given time. The SEP proposes the following two-tier GRM systems.

Level 1: This is based at the project office at the project site and will serve as entry points for all complaints related to the project. Once the grievance is registered, it would come into the Level 1 of the GRM system. The Level 1 GRM committee will be led by the Chief of the

project site office and supported by E&S Specialist, representative/s of construction contractor and a technical engineer of the project office. Together, these officials constitute the members of the four-member local level GRM committee. If required, the Level 1 GRM committee may seek support from the Judicial Committee (section 5.6 provides more information about the committee) at the local level.

Level 2: If the complainant rejects the resolution made by the Level 1 or the GRM Committee remains unable to make any resolution within the stipulated time, the grievance will be scaled up to level 2 of the GRM system. The Level 2 GRM committee, which will be based in the PCU of the DoR, will be headed by the chief of the PCU, and supported by the Social Staff at the PCU and another person assigned by the PCU head. The three-member committee can seek supports from other experts or institutions in course of investigating and resolving complaints. If complainants remain unsatisfied or reject the resolution provided by the Level 3 GRM, they will be advised to seek recourse through the courts or any formal system available.

Figure6.1: GRM system



6.4 Key steps and procedures of the GRM System

Step 1: Receive, register, and acknowledge the grievance

The project will ensure the availability of a variety of methods for stakeholders to lodge grievances. Affected people and other stakeholders can lodge a grievance at Level 1 by:

- Filling out and submit complaint forms at the project site office. The E&S Specialist at the Project Site Office will assist in filling out the complaint form for complainants who are unable to read or write and/or are unfamiliar with the grievance process. In such case, the Social Safeguard Specialist or any other person assigned for the task will formally register the grievance by filling out the complaint form made available for the project
- Sending emails or by calling in the assigned number/s of the project office
- Using the project social media handles such as Facebook
- Sending grievances through postal service to project offices at Federal and local levels.

Upon receipt of complaints, the E&S Specialist or any other person assigned for the task will provide a unique grievance number to each grievance for easy tracking and will acknowledge the receipt of the complaint within 5 working days through a phone call, text message, or a meeting with the complainant. The acknowledgment will include the grievance registration number so the complainant can use this as a reference to track the status of the complaint either by visiting the project site office or calling the assigned staff. If the grievance is not well understood or if additional information is required, the assigned staff may contact the complainant during this step for further clarification.

Step 2: Review and investigate the grievance

The grievance is screened, and the significance of the grievance will be assessed within 15 days of receipt. If the grievance is admissible and related to the project or triggered by the project activities, the Level 1 GRM committee will start processing the complaint. The E&S staff at the project site office will immediately start processing grievance of all levels of significance as described in the table given below. However, the grievance with the higher significance will get priority.

Table 6.1: Significance Criteria

Significance Level	Range of Grievance	Example
Level 1 Complaint	A complaint where potential impacts and/ or consequences are low that can be resolved quickly	Project construction vehicle damaging a local family's fences or a water pipeline to a household
Level 2 Complaint	A complaint which is widespread and repeated	Dust/noise/vibration from construction activities/vehicles, obstruction in accessing to common property

Level 3 Complaint	A complaint that could potentially result in a serious breach of DoR/MoPIT/MoFE policies or National law or affect MoPIT and Project image and performance	Inadequate waste management and weak safety features, resulting in serious and repeated accidents
-------------------	--	---

If the grievance is not related to the project or not triggered by the project, it will be treated as non-project-related grievances and the complainant will be communicated along with an explanation. However, if non-project-related grievances related to SEA/SH cases come to the GRM, it will be referred to the existing local service providers in the project area that will be mapped out by the project.

Step 3: Develop resolution and respond to the complainant

Upon investigation, the committee will propose a resolution as soon as possible, and in consultation with the complainant and other concerned, not later than 15 days after screening and assessing the grievance at Level 1. The resolution is communicated to the complainant through the proper channel. The Level 1 GRM committee will ask the complainant for a written acceptance of the resolution if he/she is satisfied with the resolution. In that case, the agreed set of actions will be implemented and once the set of actions are completed, the grievance will be formally closed by using a Grievance Closure Form provided in Annex 3.

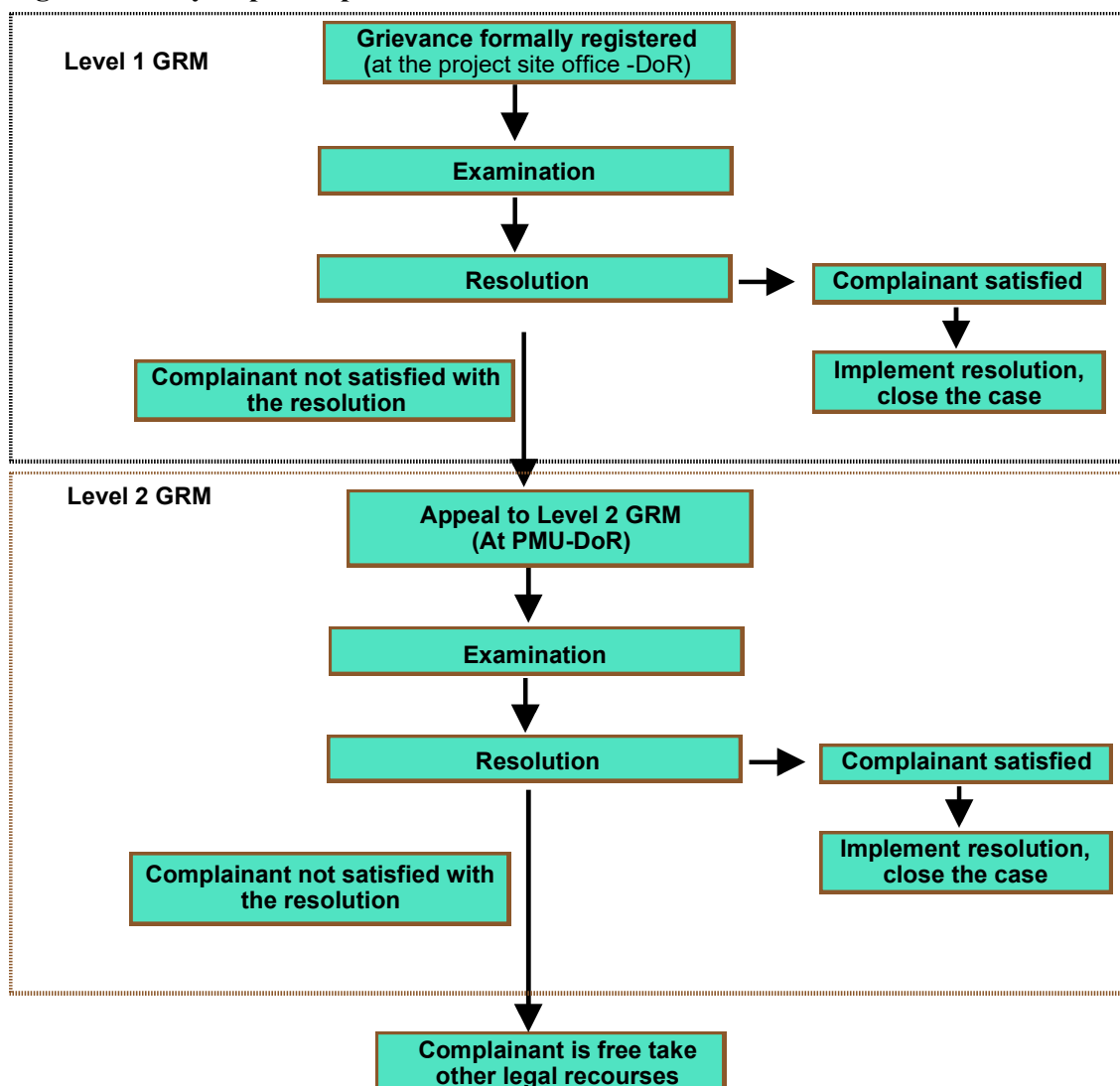
Step 4: Scale-up the grievance if the complainant remains dissatisfied

If the complainant rejects the proposed resolution or the Level 1 GRM system fails to provide a resolution within the stipulated time, the Level 1 GRM system will refer the case to the grievance to the Level 2 GRM system led by the Project Directors at the PCUs. The three-member Level 2 GRM committee, which also includes the Social Development Specialist of the DoR will facilitate to reach an agreeable resolution and the committee will produce a resolution within 20 working days. If the resolution is accepted by the complainant, it will be implemented, and the grievance will be closed once the implementation is completed.

Step 5: Recourse to legal and other formal recourse

If the complainant rejects the proposed resolution, the complainant is free to utilize legal and other formal mechanisms in place at the local or national level.

Figure 5.2: Key steps and procedures



6.5 GRM in COVID-19 Crisis

In addition to the standard approach of handling and processing the grievances and complaints, due to the continued threat of COVID-19, the project, in the light of continued of COVID-19 threats, will deploy modern means and tools to allow stakeholders to officially file complaints and grievances against the project activities. In addition to the project website and social media platforms that will enable the complainants to upload their complaints and grievances, the project will also allow the complainant to register grievances by directly making a call to Social Safeguard specialists at the PCU. Moreover, the project will explore an option to introduce a digital grievance filing system through which complaints can be filed through the internet into a designated webpage of the project. Once the complaint or grievance is received through the website, social media, or direct calls, the Social Safeguard specialists at the PCU will forward them to the concerned E&S staff at the project site office and the staff will ensure the registration of such complaints or grievances into the GRM system as explained

Section 5.3. In addition to the registration, the E&S staff will also maintain a grievance registry and will officially close the grievance once it is solved by using the forms given in Appendix 3.

6.6 Use of the Existing Dispute Resolution Systems

In addition to the GRM system explained above, the project will also explore the possibilities of seeking support from the existing system at the local levels in course of resolving the project-related grievances. Article 117 of the Constitution of Nepal, promulgated in 2015, prescribed a three-member Judicial Committee at the local level coordinated by its Vice-Chairperson in the case of a Rural Municipality and by its Deputy Mayor in the case of a Municipality, to settle disputes under their respective jurisdictions in accordance with the law. The Local Government Operation Act, 2017 provides the operational guidance and scope of work of the Judicial Committee. However, given the limitation of the Judicial Committee, particularly in terms of capacity to handle and respond to the GBV cases and coordinating with service providers and other relevant government and non-government agencies, the project will also seek the support of established and functioning helplines, such as 1145, which is a 24-hour toll-free hotline operated by National Women Commission for GBV related cases and 1198, a child helpline for cases related to violence against children.

6.7 Grievances About GBV

The existing GRM put in place for the project will also be used for addressing GBV and SEA/SH-related issues and the PCUs will oversee GBV related complaints. The project will place its uppermost priority on handling and managing the GBV related grievance by maintaining full confidentiality of the survivor. The PCU will put in place necessary mechanisms for confidential reporting with safe and ethical documentation of GBV issues at the center and the project site office at the local level. Although the first receiver of the grievances in relation to GBV will be the E&S staff of the project site office, the project will also assign a female staff to respond the SEA/ receiver SH case and the staff will be trained on managing and handling such grievances. GBV referral pathway will be established and communicated to both PCU at the DoR and project site office. Further, the GRM will also put in place a systematic to immediately notify both the PCU and the World Bank of any GBV complaints, with the written consent of the survivor. As per the requirement of the World Bank, the PCU, in support of the World Bank, will prepare and implement the SEA/SH Action Plan before the implementation of the project. The purpose of this action plan is to sensitize the communities and other stakeholders about the potential risks of GBV and to strengthen the institutional capacities to respond to the risks of such violence. In preparing the plan, a survivor-centric approach will be followed with a focus on victims survivors' care and provision for access to different referral mechanisms. In addition, the project will undertake a mapping of service providers in the project areas to identify potential and assess their capacity

to promptly respond to the cases related to gender-based violence. Based on the mapping, a list of potential service providers along with their contact details will be prepared to be readily available in case of such GBV incidents.

6.8 GRM for Workers

A GRM will be explicitly established for worker-related grievances, following ESS2. This includes all issues of project workers. The accommodation (health and sanitation), availability of safety gazettes, equal wages to males and females for works of similar nature, delay in payments, hiring of labors without contract documents and GBV. The project workers related GRM has been detailed in the Labor Management Procedures (LMP).

7. Monitoring and Reporting

7.1 Monitoring of Stakeholder Engagement Activities

Being a living document, the SEP will be periodically revised and updated as required during project construction and operation to ensure that the information incorporated, and the situation analyzed in the SEP is up to date consistent and with the changing ground scenario. Moreover, the periodic revision will ensure that the engagement strategies of the SEP are revised and readjusted as the project stakeholders identified and considered in the SEP change over a period. Broadly, the monitoring and tracking of the implementation of the SEP are important to:

- Ensures effective and continuous engagement with the identified stakeholders and follow-up
- Ensures a responsive and functioning GRM, and
- Minimizes slippages and oversight of important engagements aspects.

The project aims to apply two methods to monitor the overall outcomes of stakeholder engagement. These are:

1. **Review of engagement activities in the field:** The E&S Specialist at project site office will assess the usefulness and effectiveness of the stakeholder consultations that will be organized quarterly by using a feedback form and interviewing the participants after the activity. The feedback and comments made by the participants will be carefully examined and appropriate changes/reforms will be made in future engagement activities to enhance their effectiveness. Such changes will be communicated to the stakeholders in the next consultation.
2. **Periodic reporting:** The E&S Specialist at project site office will prepare a quarterly SEP Implementation Report and submit it to the Social Staff of the PCUs and MoICS. Once approved by the Social Staff and the chief of the PCU, the report will be disseminated to the stakeholders through periodic consultations and the project and DoR and MoICS websites.

7.2 Alternative means of monitoring and reporting in COVID-19 crisis

The COVID-19 crisis has limited the prospects of face-to-face public gatherings and group discussions. As such the project will also use alternative options to gauge the effectiveness of stakeholder engagement activities and to understand the required corrective actions to ensure that the activities ultimately achieve their goals. In addition to the traditional means of public gathering as mentioned above, E&S specialist present at the project site office will use the following alternatives means to achieve the goals of effective stakeholder engagement. These include:

- Establishing direct contacts with some of the stakeholders chosen randomly to understand their perception and effectiveness of the stakeholder engagement activities.
- Talking with representatives of IP communities, vulnerable groups including Dalits, and other marginalized communities to know their perceptions and impressions of engagement activities.
- Talking directly with the Ward Chairperson and other officials of local governments and get their thoughts about the engagement activities.
- Analyze comments and feedback posted on the Facebook and other social media accounts of the project.
- Analyze the news coverage of the project activities in the national and local media and other mass communication means.

7.3 Reporting of Stakeholder Engagement Activities

The PCUs at the MoICS, MoFE and the DoR will be responsible for the effective implementing of the SEP and its periodic reporting. The designated social staff at the PCU will be responsible for collating the summaries and internal reports of the stakeholder engagement activities, management of GRM, inquiries, and related incidents together with the status of implementation of associated corrective/preventative actions from the project site office on the monthly basis. Based on the information, the social specialists assigned at the PCUs of the MoICS, and the DoR will lead the preparation of a quarterly monitoring report of the SEP implementation and submit it to the chief of their respective PCUs. Once cleared by the chief of the PCU, the report will be disseminated through the project and MoICS and the DoR websites and will also be shared with the World Bank E&S team. The quarterly report will use the following performance indicators as the template to officially inform the periodic review of the implementation of the SEP.

Table 7.1: Performance Indicators

Objectives	SEP Performance Indicators
Stakeholders are provided information about the project in a timely and culturally appropriate manner	<ul style="list-style-type: none"> • Means used to inform stakeholders about the stakeholder consultations <ul style="list-style-type: none"> ○ Were the participants given advance notice about the meeting, including the time and venue of the meeting? ○ Were the time and the venue appropriate to the stakeholders given the local context and settings? ○ Were the participants communicated in advance about the meeting agenda? • Means used to organize consultations, such as small group meeting, video/audio conference, group chat meeting on one of the social media platforms and their usage and effectiveness. <ul style="list-style-type: none"> ○ Were the COVID-19 protocols considered for the group meeting? • Number of consultation meetings, both face-to-face and virtual, within a specific period, particularly with the focus on women, IPs, and vulnerable people, including Dalits and religious minorities. • Means of dissemination and number of materials disseminated <ul style="list-style-type: none"> ○ How effective were the materials used for dissemination? ○ Comments received on disclosure materials, positive or negative.
Stakeholders have an opportunity to share their views and concerns about the Project's development	<ul style="list-style-type: none"> • Type of engagement opportunities given to participants in the meeting in terms of raised and comments made. <ul style="list-style-type: none"> ○ How many participants shared their views and concerns? ○ How many of them were women, IPs, or Dalits? ○ Did all those who wanted to share their views and concerns get a chance to speak? • Attendance rates and nature of participation in terms of gender and indigenous people, Dalits, and vulnerable people. <ul style="list-style-type: none"> ○ How many were the women of the total participants? ○ How many were the IPs, Dalits, and other vulnerable people of the total participants? ○ How many were the differently able people of the total participants? • Quality of recording of comments made by the participants maintained by the project. • Numbers of grievances related to the project activities and means used by the complaints to lodge their grievance.

Objectives	SEP Performance Indicators
Informed participation of the IPs and vulnerable groups	<ul style="list-style-type: none"> • Number and type of engagement opportunities provided to IPs, Dalits and other Vulnerable Groups and means and medium of engagement. <ul style="list-style-type: none"> ○ How were the IPs, Dalits, and other vulnerable informed about such consultations? ○ How many IPs, Dalits, and other vulnerable people shared their views and concerns in the consultations? ○ Number of FGDs means and the medium used for engagement. ○ Types of feedback/comments received from the IPs, Dalits, and vulnerable groups. ○ Representation of all sub-groups. ○ Number and types of grievances received from the IPs, Dalits, and vulnerable groups.
Positive working relationships are built and maintained over time	<ul style="list-style-type: none"> • Total number and type of grievances lodged by stakeholders in a reporting period (each quarter) • Methods used in lodging the grievances (in person, through forms, phone, email, and other means). • Number of satisfactorily closed out grievances. • Current status of unresolved grievance and major reasons for being unresolved. • Community attitudes and perceptions towards the GRM.
Engagement continues to be transparent, inclusive, and appropriate throughout the Project lifecycle	<ul style="list-style-type: none"> • Adherence to the schedule of stakeholder engagement activities. • Representation of IPs, Dalits, and other Vulnerable Groups in engagement activities. • Number and type of grievances lodged by community members. • Reasons for non or low participation of the specific group, the community of specific location, women, IPs, and Vulnerable Groups, including the Dalits, in any.

Annex 1 - Sample Grievance Form

Grievance Form

Grievance registration no.	
Date of registration	

Details of complainant: ☐ (Tick the box for anonymity)

Name:

First Name	Middle name	Last name

Gender:

☐ Male ☐ Female ☐ Others

Address:

Province	District	Municipality	Ward No.	Name of place

Contact details:

Primary mobile no.		Email	
Secondary mobile no.		Facebook	

Preferred mode of contact: _____

Brief description of grievance

Mode of submission of grievance:

☐ Verbal ☐ Written ☐ Complaint Box ☐ Phone ☐ Email ☐ Others

Signature of Complainant

Signature of Grievance Officer

Annex 2 - Sample Grievance Registration Template

[illegible]

Annex 3 - Sample Grievance Closure Form

Grievance Closure Form Resolution	
Grievance Number	
Grievance registered date	
Describe the steps taken to resolve the grievance	
Describe the resolution	
Department: Mode of communication for reply (meeting/ written/ verbal/ display): Date closed:	
Signatures	
Complainant: Project representative: Date:	