



STAKEHOLDER ENGAGEMENT PLAN

*Central Asia Regional Economic Co-operation Corridors 2, 3 and 5
(Obigarm-Nurobod) Road Project, Tajikistan*

July 2019

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1 INTRODUCTION

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) prepared for the Ministry of Transport defining communication channels and plans regarding the following developments; The M-41 road, part of the Central Asia Regional Economic Co-operation (CAREC) network (Corridors 2, 3 and 5) required to be replaced with a new road as the Rogun Dam is being built 100km east of Dushanbe to harness the hydropower potential of the Vahdat River. When the dam is impounded it will cover the existing M-41 road. The Project is to build a new replacement 76 km road for the M-41 in the mountain range to the north of the Vahdat River Valley.

The SEP provides an overview of relevant national legislation, the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2014, the Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework 2016, the Asian Development Bank (ADB) Safeguards Policy Statement requirements, the OPEC¹ Fund for International Development (OFID) Global Partnership for Effective Development Cooperation and the four shared principles of development, European Union (EU) directives and international best practice related to information disclosure and outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document so it should be reviewed and updated periodically and in line with new activities, changes in Project design and newly identified stakeholders. In addition, the EIA is in the public domain and the public has the right to request access.

The SEP is part of the disclosure package developed for this Project, which consists of the Environmental and Social Impact Assessment (ESIA), Non-Technical Summary (NTS), SEP, Land Acquisition and Resettlement Plan (LARP), Environmental and Social Action Plan (ESAP) and the Environmental and Social Management Plan (ESMP). All these documents will be publicly disclosed via specified routes in Section 6.2 of this SEP.

Specific objectives of the SEP are detailed below.

1.2 OBJECTIVES OF THE PLAN

The SEP aims at summarising the methods, procedures, policies and activities that will be implemented by the Ministry of Transport (MoT) Project Implementation Unit for Road Rehabilitation (PIURR) (the “Client”). The purpose is to inform stakeholders in an inclusive and timely manner about the potential impacts of the Project.

The public will be able to access and review this SEP at fifth floor of the Ministry offices, 14 Aini Street, Dushanbe. Hard copies of the SEP will be available at the MoT offices and within the identified local villages, details of which can be found in Section 6.2. Both the SEP and NTS will be provided in Tajik and Russian. In addition, a Project information brochure will be disseminated prior to construction covering key points, see section 6.2 and Appendix 3 for the proposed Project brochure.

Stakeholder engagement and consultation aims to inform and improve Project decision-making and build understanding by actively involving individuals, groups and organizations with a stake in the Project. It helps to:

§ Identify and involve all potentially affected groups and individuals;

¹ Organization of the Petroleum Exporting Countries (OPEC)

- § Generate a good understanding of the Project amongst those that will be affected or have a vested interest;
- § Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- § Ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
- § Establish a system for long-term communications between the Project developer and communities that is of benefit to all parties.

2 PROJECT DESCRIPTION

2.1 PROJECT CONTEXT

The Ministry for Transport of the Republic of Tajikistan approached the European Bank for Reconstruction and Development (EBRD) in January 2019 requesting a sovereign-guaranteed loan to co-finance the fourth phase of the Dushanbe to Karamyk at Kyrgyz Border road improvement Project along with Asian Development Bank (ADB), Opec Fund for International Development (OFID) and Asian Infrastructure Investment Bank (AIIB). The proposed road will replace a section of the existing M-41 road between Obigarm and Nurobod, which will be inundated (flooded) as the Rogun Hydro Power Project (HPP) reservoir fills. The total length of the road is approximately 340 km, of which 265 km were rehabilitated under previous phases I, II and III, financed by ADB.

The remaining section, Phase IV, is approximately 75 km long (the “Project”). It extends from the Obigarm to near the center of Nurabod district.

2.2 RECONSTRUCTION PLANNED

The Project forms part of CAREC International Corridor 3 which crosses the country from East to West and connects Tajikistan to Kyrgyzstan and China. The Project will traverse the administrative regions of Rogun and Nurobod which cover 7 rural communities and will also serve some 17 villages and communities that presently rely on poorly maintained local access roads connecting to the existing M41 road.

A major portion of the bypass road must be completed and opened to traffic by November 2023 at the latest, the date by which the rising water in the hydropower reservoir will have inundated several critical sections of the existing road. No other part of Tajikistan’s national road network can provide an alternate economic route for this traffic, and the only alternative route would represent a deviation of about 500 km.

2.3 DESCRIPTION OF ALIGNMENT

The proposed Obigarm - Nurabod Road Project (also referred to as the Rogun Bypass road) aims to construct an approximately 75 km alternative alignment (the “Project road”) for the existing M-41 road connecting the northeast region of Tajikistan and the Kyrgyz Republic between Obigarm (72 km) and Nurobod (158 km), which will be inundated (flooded) to create the reservoir of the Rogun Hydropower Project (HPP), that is now under construction.

The Project road is divided into three sections: (1) the Obigarm-Tagikamar section is about 30 km long and includes 2 tunnels of 1.6 km and 1.7 km and local access roads of circa 30 km (Section 1); (ii) the Tagikamar-Nurobod is about 44 km long and includes 1 tunnel of 2.6 km, 1 long temporary bridge and local access roads of circa 40 km (Section 2); and (iii) section 3 includes a bridge that is about 760 m long and its approaches. These sections correspond to three contract packages that will be procured separately through open competitive bidding.

Package 1 will be financed by USD 110 million grant from ADB and USD 40 million loan from OFID. Package 1 consists of the following sections of the Road: Section 1 - Javoni – Kandak; Section 2 - Gazakyon – Sebnok (Lugur); and Section 3 - Hakimi – Siyohgulak; including Bridge No 1 through Bridge No 6 and Tunnel No 1 (Kandak Tunnel) and Tunnel No 2 (Karagach Tunnel) ending short of the south portal of Tunnel No 3 (Tagikamar Tunnel).

Package 2 will be financed by USD 150 million loan from EBRD. Package 2 consists of the following sections of the Road from 33km: Section 4- Mudzhiharv-Alihodzha, Section 5 - Alihodzha – Tuthor; Section 6 - Tuthor – Kabudiyon (Samsolik); Section 7 - Kaboudiyon –

Humdon, including Bridge No 7 through Bridge No 13, Tunnel No 3 (Tagikamar Tunnel) and the temporary bridge over the Rogun HPP Reservoir at Darband over the Surhkhob River.

Package 3 will be financed by USD 40 million loan from AIIB and covers the long permanent bridge (760 m) over the Rogun HPP Reservoir at Darband over the Surhkhob River.

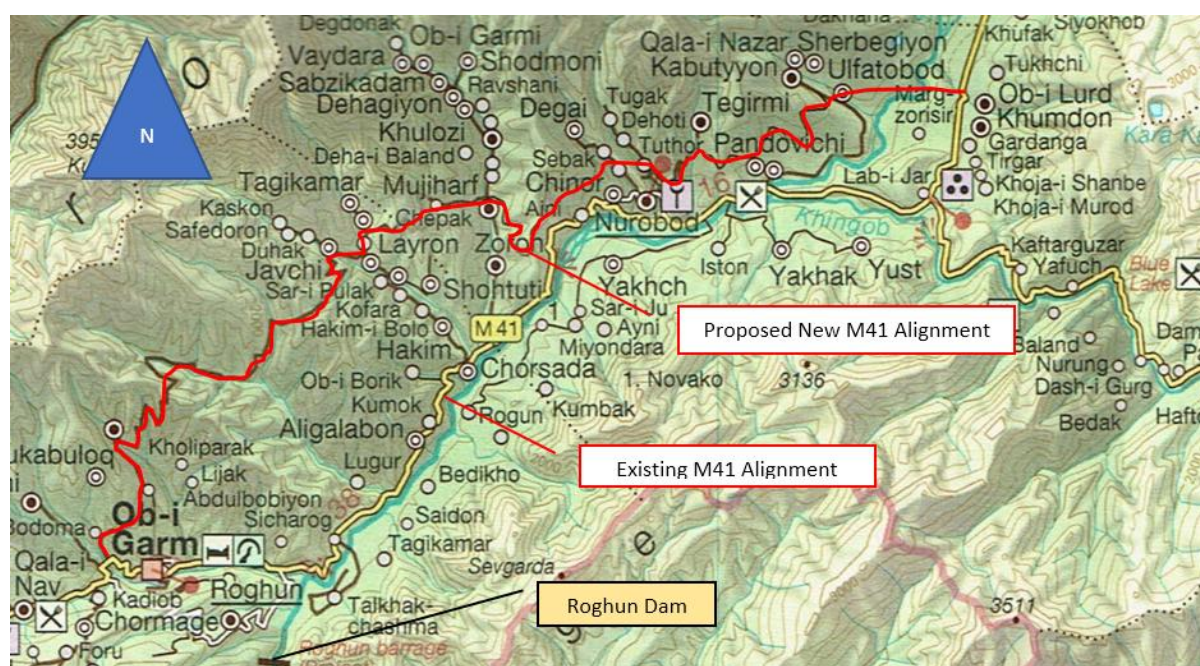
The respective chainage is presented in Table 1 below:

Table 1 - Respective Finance Chainage

| Section | Financier |
|---|-----------|
| Section 1: Km 0+000 to Km 30+217 | ADB/OFID |
| Section 2: Km 30+217 to Km 75+600, less the section for Package 3 which runs from Km 72+900 to Km 74+303. | EBRD |
| Section 3: Km 72+900 to Km 74+303 including the 760m bridge | AIIB |

The current road alignment will be widened to build the road as a Design Category III road², therefore, further cutting of road into the slopes of the surrounding terrain and embankment construction will be required.

Figure 1 – Existing and Proposed M-41 Road Replacement



Source: Southern Tajikistan – Tourist Map, Gecko Maps. www.geckomaps.com

Development of the feasibility study and the working documentation of this road under a Class IV Technical Category³ commenced in 1975. In 1984 the Project was approved, and road construction began and was continued up to 1992. During this period works carried out

² Category I road requires a design speed of 120 km per hour, and a carriageway of 4 or more lanes with lane width of 3.75 meters each. Category II road requires a design speed of 100 km per hour, and a carriageway of 2 lanes with lane width of 3.75 meters each. Category III road requires a design speed of 80 km per hour, and a carriageway of 2 lanes with lane width of 3.5 meters each.

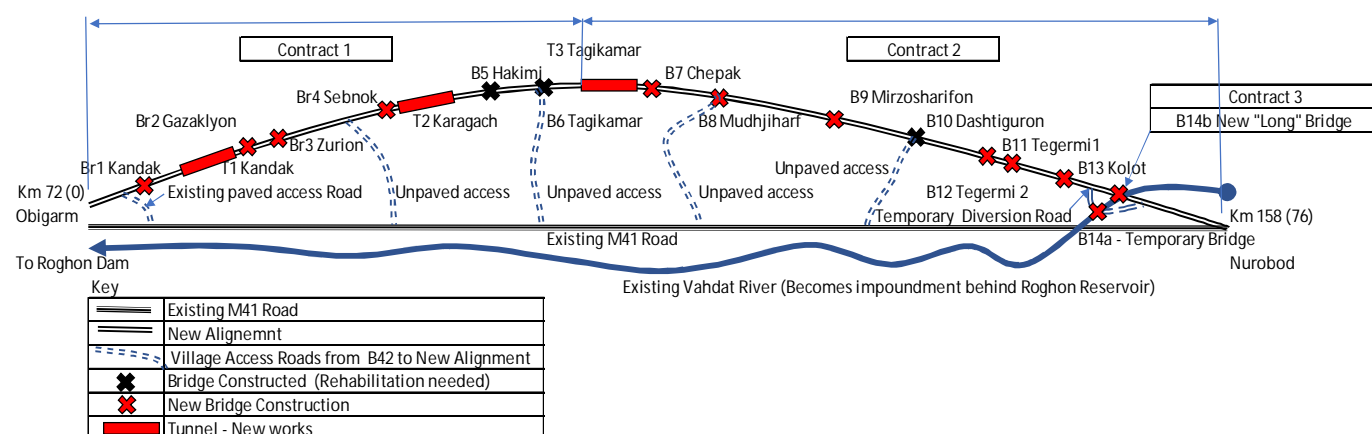
ADB (2010) Proposed Grant, CAREC Corridor 3 [Online] Available at <https://www.gtai.de/GTAI/Content/DE/Trade/Fachdaten/PRO/2011/02/P19202.pdf?v=6>

³ Based on the existing Soviet Standards of the time. Existing road categorisation can be found in the ESIA, Chapter 3.

included: some earth works⁴, construction of four bridges, and some culverts⁵. Work on two tunnels (Kandak and Karagach) was also commenced but progressed very slowly due to limited funds. At the beginning of 1990 the Project was suspended with the break-up of the Soviet Union. The Project was not restarted, and much of earlier work (rockfall protection and structure stability) has since been damaged and now needs to be repaired/ rebuilt.

The proposed road alignment generally follows the same alignment that was studied and selected during the Soviet era, with the base earthworks for this alignment having already been established. Some adjustments to the original alignment have been agreed. The design has been carried out in accordance to MKШ 32-02-2012 "Highways" (Kazakhstan Design Manual), which replicates, and is consistent with the standards of SNIP 2.05.02-85⁶.

Figure 2 – Schematic of Alignment Showing Location of Bridges, Tunnels and Access Points



Source : EIA document

The Project will require acquisition of land and properties. A LARP based on the detailed design data and an inventory of affected assets, was prepared and will be disclosed online on EBRD (www.ebrd.com) and MoT websites (www.mintrans.tj) as part of the public disclosure package. Hard copies of documents will be available at the MoT address provided above and in identified village offices (details provided in Annex 2)

⁴ Earthworks can mean to excavate the existing land to a suitable level so that road construction may begin. This can take the form of either excavation in the form of cuts or the construction of embankments to carry an elevated road.

⁵ A tunnel carrying a stream or open drain under a road.

⁶ Construction Norms and Regulations for the design for highways, roads of all types and urban streets.

3 CONSULTATION AND DISCLOSURE LEGISLATIVE FRAMEWORK

3.1 NATIONAL LEGISLATION REQUIREMENTS

Environmental Impact Assessment Approval Process

The national Environmental Impact Assessment (EIA) procedure is set out by Resolution of the Government of the Republic of Tajikistan No. 532. According to the resolution, EIA is the responsibility of the initiator of the project and conducting a State Environmental Review of all investment projects is the responsibility of the Committee for Environmental Protection (CEP) under the Government of the Republic of Tajikistan and its regional offices. In addition, according to the 2018 Law on State Environmental Review all construction work, including rehabilitation, must be assessed for their environmental impact and proposed mitigation measures and monitored by the CEP. The Project ESIA Section 2.6 provides details on the Tajikistan EIA legal framework, environmental licences and permits.

On 17 July 2001, Tajikistan acceded to the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters. The provision of this Convention on the right to conduct public environmental impact assessment prevails over the provision of the national law.

According to the law, for any project subject to an EIA, the public has the right to initiate their own public environmental assessment prior to, or concurrently with, the state EIA determination process. The public Environmental assessment is not mandatory according to national legislation. The outcome of the public assessment is of an advisory nature and has to be reviewed during the state determination process.

The EIA is carried out by an expert or an expert committee, as set out in the legislation. According to the EIA law⁷, depending on the significance of environmental impacts, a project can be assigned a category "A", "B", "V" and "G". Category A refers to "high risk", category B is "medium risk", category V is "low risk" and category G relates to "minimal or no risk". This Project is categorised as "A" of environmental impact (highways of national importance).

The public has the right to request public hearings to be carried out. For category "A" projects, the authorized state body (MoT PIURR) should develop a SEP with the possibility of conducting consultations and taking into account the opinions of citizens. It should be noted that this SEP may be used during consultations and no separate SEP is required to be developed.

Review of the documents can take up to 60 days depending on the category of the project. As a result of the review, a positive or a negative conclusion is issued by the state institution. A positive conclusion is often supplemented by recommendations, for example, obtaining additional permits (emissions to air, wastewater discharge and waste) and activities to improve the surrounding environment. The conclusion is valid for the duration of the life cycle of the technology. If changes are made to the work processes or technologies which result in greater/smaller impact on the environment, a new assessment will have to be carried out.

This road Project will be subject to EIA under the local legal requirements, and a positive conclusion from the Committee for Environmental Protection under the Government of the

⁷ Annex 1 to the Resolution No. 532 of the Government of the Republic of Tajikistan

Republic of Tajikistan will need to be obtained prior to commencement of construction and operation.

Grievance Mechanism

In Tajikistan disagreements are resolved through Jamoats' (Hukumats') grievance mechanism or appeal to court. A grievance redress mechanism (GRM) capable of receiving and facilitating the resolution of affected persons' concerns and grievances related to the Project is required as a formalized way for the PIURR to identify and resolve concerns and grievances.

The MoT require the establishment and development of the GRM at the Jamoat (sub-district) level. Grievance redress committees (GRC) have been established at the village level in each Project village, with 17 GRCs at this level.

Full details of the Grievance Procedure for this Project can be found at Section 8.1 of this SEP.

Land Acquisition and Resettlement

There is no special law or policy in the legislation of Tajikistan which regulates the issues of resettlement and/or land acquisition or expropriation of rights to land and immovable property for state or public needs. Moreover, there is no separate law that completely provides norms and mechanisms for the determination of the full and fair, market value of land. The key legislative acts regulating land management relations and the ownership rights to immovable properties in the Republic of Tajikistan are the following:

- § Constitution of the Republic of Tajikistan (1994, as amended in 2003)
- § Land Code (amended in 2012)
- § Land Code (amended in 2008)
- § Civil Code (amended in 2007)
- § Regulation "about compensation of losses to the land users and losses of agricultural products" (approved by the Decree of Government of Republic of Tajikistan, 2000. № 515)

The Constitution of the Republic of Tajikistan, Land Code and the Civil Code of the Republic of Tajikistan are the fundamental laws on which the legislation is based. The framework for the Project is based on EBRD requirements, as well as other IFIs such as ADB, OFID and AIIB will be applied covering the full Project alignment and applicable laws, regulations and policies. Where differences exist between local law and ADB policies and practices, the resettlement for this Project will be resolved in favour of the latter. Full details of the regulatory framework related to land acquisition and resettlement can be found in Section 2 of the ESIA.

3.2 EBRD REQUIREMENTS

The Project needs to adhere to EBRD Environmental and Social Policy 2014⁸ and the ten EBRD Performance Requirements (PRs). The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. The EBRD PR 7 (Indigenous peoples) and PR 9 (Financial Intermediaries) are not applicable, as there are no indigenous peoples within the Project area, and no financial intermediaries are involved. The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

⁸ EBRD (2014) Environmental and Social Policy [Online] Available at: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

Table 2 EBRD PR10 Requirements

| | |
|---|--|
| § | Identify the various individuals or groups who are affected or likely to be affected by the Project; or may have an interest in the Project. |
| § | Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity. |
| § | Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate. |
| § | Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language. |
| § | Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances. |

3.3 ASIAN INFRASTRUCTURE AND INVESTMENT BANK (AIIB) REQUIREMENTS

Asian Infrastructure and Investment Bank's (AIIB's) Environmental and Social Framework⁹ covers environmental and social sustainability; and AIIB's role in meeting the challenge of sustainable development in Asia. The Environmental and Social Policy (ESP) comprises mandatory environmental and social requirements for each Project and Environmental and Social Standards.

Mandatory environmental and social standards (ESSs) relevant to the Project's detailed environmental and social requirements are set out below.

- § ESS 1: Environmental and Social Assessment and Management
- § ESS 2: Involuntary Resettlement

3.4 ADB REQUIREMENTS

The Project needs to adhere to ADB Safeguard Policy Statement (2009) which builds upon previous safeguard policies on the environment, involuntary resettlement, and indigenous peoples with the aim of promoting sustainability of Project outcomes by protecting the environment and people from Projects' potential adverse impacts by avoiding adverse impacts of Projects on the environment and affected people.¹⁰

3.5 OFID REQUIREMENTS

OFID co-finance public sector operations with the governments of recipient countries and often with other donors, including regional development banks, UN agencies and the bilateral and multilateral development agencies of OPEC Member Countries. This Global Partnership for Effective Development Cooperation and the four shared principles of development: ownership of development priorities by developing countries; a focus on results; inclusive partnerships; and transparency and accountability is adhered to and to encourage sustainability, OFID's public sector operations focus on capacity building and institution strengthening.

⁹ AIIB (2016) Environmental and Social Framework [Online] Available at: <https://www.aiib.org/en/policies-strategies/download/environment-framework/20160226043633542.pdf>

¹⁰ ADB (2009) Safeguard Policy Statement. [Online] Available at: <https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf>

3.6 BEST INTERNATIONAL PRACTICE

The key principles of inclusive and effective engagement for a Project are summarised as follows:

- § Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s).
- § Providing information in advance of consultation activities and decision-making.
- § Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate.
- § Respect for local traditions, language, timeframes and decision-making processes.
- § Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed.
- § Inclusiveness in representation of views, including people from different age groups, gender, vulnerability and/or minority groups.
- § Processes free of intimidation or coercion or incentivisation.
- § Clear mechanisms for responding to people's concerns, suggestions and grievances.
- § Incorporating, where appropriate and feasible, feedback into Project or programs design and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by the Client dependent on the gaps between national legislation, ADB requirements, EBRD requirements and best international practices.

3.7 GENERAL STAKEHOLDER COMMUNICATION RECORDS MAINTENANCE

Consultation records, minutes of meetings and write-ups of formal and informal consultations will be maintained by the local Jamoat and the designated Community Liaison Officer (CLO) clearly logging the key information provided to stakeholders and the key incoming communications, complaints and questions along with a summary of actions taken. Contact details for local Jamoats and CLOs can be found in Annex 2 of this SEP.

As part of this communication procedure, local Jamoats and CLOs will record and update these stakeholder engagement activities on an on-going basis. These records will be submitted to the PIURR on a monthly basis. The PIURR will prepare annual reports to be issued to the EBRD and other IFIs summarising the activities and key emerging themes raised by affected people.

Both the Heads of the Jamoats in their role as the Focal Points and the identified CLOs will liaise with the local community on behalf of the Jamoat. The CLO is usually the Secretary of Jamoat.

It should be noted that there is at least one lead woman within each village who can act as a focal point for any women within their villages who wish to raise concerns. Women contacts have been highlighted in Annex 2. Concerns may also be lodged with the Committee on Woman and Family Affairs (CWFA) under the Government of the Republic of Tajikistan. A communication link is to be established between CLOs and the CWFA, the means for communication and reporting needs to be clear and documented and it will be the responsibility of the PIURR and local Jamoat CLOs to liaise with this organisation.

The CWFA was established in June 1991 by a Decision of the Government of Tajikistan¹¹. As part of their responsibilities, the CWFA proposes projects on the socio-economic and

¹¹ UN (2011) Committee on Women and the Family [Online] Available at: <http://evaw-global-database.unwomen.org/en/countries/asia/tajikistan/1991/committee-on-women-and-the-family>

political protection of women's rights to the Government. They work closely with all Government departments including the Department of Education and Culture, the Department for Work with Youth and the Commission on the Rights of the Child. In addition, they are concerned with ensuring gender equality for women and girls in the Republic of Tajikistan¹². CWFA district office contact details can be found in Annex 1.

¹² Information provided by the CWFA of Norobod district.

4 STAKEHOLDER IDENTIFICATION

4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of environmental and social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) primary stakeholders are the individuals and groups who are affected directly by the Project; and
- b) secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by, the Project.

The Project footprint will cause the following direct impacts:

Loss of homes, loss of employment as a result of loss of business, loss of livelihood as a result of loss of land and agriculture (including crops and animal husbandry). The following provides a list of potential environmental and social risks that are associated with (but not limited to) the Project:

- § Pollutants and emissions to atmosphere from construction and use of vehicles;
- § Noise and vibration from use of road construction processes;
- § Pollution of surface water from road vehicles, filling of vehicles with fuel and oils etc;
- § Pollution of soil during the construction period due to spillages of lubricating material, fuel, bitumen etc.;
- § Dust pollution during construction works;
- § Local discomfort and nuisance to families, women and the elderly;
- § The risks of collisions and accidents involving persons;
- § The risks of collisions and accidents with domestic animals;
- § Local disturbance associated with construction workers;
- § Impact on women's safety resulting from migration of workers into the area; and
- § Planning for the demolition of buildings and removal or repositioning of utilities.

Therefore, this SEP has been developed to address community concerns with regards to key environmental and social risks through implementation of the stakeholder consultation and information disclosure activities.

The nature of the indirect impacts (Table 3 below) would be mainly associated with construction works and operation of construction camps. Full details of work sites and construction camps mitigation can be found in the ESIA section 7.5.24.

Table 3 - Indirectly Impacted Communities

| | |
|---|---|
| § | Residential areas / households near construction of road |
| § | Business areas including commercial and agricultural land plots |
| § | Local persons/ migrant workers hired for construction (contractors will be required to implement policies into the recruitment procedures to account for hiring of local workers) |
| § | Regional public |

Key stakeholders identified are presented in Table 4 below.

Table 4: Key Identified Stakeholders and Methods of Engagement

| Type | Name | Impact/Influence | Preferred Method of Engagement |
|-------------------------------------|---|--|--|
| Communities & Businesses | <p>Communities: Residents including owners, renters, leaseholders and informal users of affected lands and buildings for the whole alignment, there are 157 Project-affected households totalling 1395 household members in 17 villages of Bozorak, Kandak, Shohi Aslon, Chavchii Poyon, Sadokat, Layron, Siyagulak, Chepak, Muchiharfi Kalon, Degai, Tuhto, Tegermi, Pandovchi, Dehi Tag, Ulfatobod, Gulmon and Navobod (7th Microrayon).¹³</p> <p>Businesses: Commercial: Owners, renters, leaseholders and informal users of permanently and temporarily affected commercial businesses. Four operating businesses; two petrol stations, one saw mill and one butcher. Agriculture: Owners, renters, leaseholders and informal users of agricultural land for agriculture and animal husbandry including cattle farmers.</p> | <p>Communities and businesses will be affected indirectly as a result of the construction and operation activities.</p> <p>Direct impacts include loss of homes, loss of employment as a result of loss of business, loss of livelihood as a result of loss of land and agriculture (including crops and animal husbandry), environmental impacts and safety</p> | MoT PIURR to facilitate regular meetings with the impacted communities/ businesses to address their concerns and issues. |
| Hukumats | Regional Administration | This group will directly influence and impact the Project through decision-making process. They are considered as 'Primary Stakeholders'. | MoT PIURR to facilitate meetings with Hukumats. |

¹³ MoT (2018), Land Acquisition and Resettlement Plan, Central Asia Regional Economic Cooperation Corridors2, 3 and 5 (Obigarm-Nurobod) Road Project, pp 30

| Type | Name | Impact/Influence | Preferred Method of Engagement |
|---|--|---|--|
| Jamoats | District Administration | This group will directly influence and impact the Project through decision-making process. They are considered as 'Primary Stakeholders'. | MoT PIURR to facilitate meetings with Hukumats. |
| Project Shareholders / Internal Stakeholders | § Ministry of Transport (MoT) – Executing Agency § Project Implementation Unit for Road Rehabilitation (PIURR) – the implementing agency § Internal employees of MoT | This group will directly influence and impact the Project through decision-making process. They are considered as 'Primary Stakeholders'. | <p>MoT PIURR to facilitate meetings with shareholders and employees (preferably quarterly).</p> <p>It is recommended that the client conduct regular meetings as part of the local PIU mandate. Monthly meetings to be undertaken at the client head office to discuss the following:</p> <ul style="list-style-type: none"> § Overall supervision of Project activities and upgrades (technical and financial, delivery of the Project) § Drafting of Terms of References and management of local consultants § Implementation of other activities identified including training and information exchange for implementation of the upgrades § Holding seminars and workshops for the development of the skills § Discuss social opportunities (including employment) for local communities § Discuss solutions to reduce impacts associated with access rights and temporary obstruction of businesses |
| Project Lenders | § EBRD § AIIB § ADB § OFID | This group will directly influence and impact the Project through decision-making process. They are considered as 'Primary Stakeholders'. | <p>EBRD – frequency of meetings will be on an as needed basis.</p> <p>ADB – frequency will be on an as needed basis but at least quarterly and in conjunction with meetings of</p> |

| Type | Name | Impact/Influence | Preferred Method of Engagement |
|---|--|---|--|
| | | | the project co-ordination committee (PCC). ¹⁴ |
| Contractors/Suppliers | Third party companies who provide and supply products and services to MoT, including the road construction contractor. Third party companies such as those that will provide maintenance, cleaning and amenity services together with infrastructure companies are currently unknown; these will be confirmed prior to construction and the SEP updated accordingly. | The contractors and suppliers will directly influence the Project through following corporate rules and compliance with environmental and social legislation and lender requirements. | MoT PIURR to incorporate environmental and social standards in related tenders and ensure monitoring of suppliers on labour management issues and evaluate compliance with Tajik laws and lender requirements. |
| Permitting bodies, local governmental agencies | <p>§ Committee for Environmental Protection (CEP)</p> <p>§ Ministry of Finance (Executing Agency)</p> <p>§ Ministry of Culture</p> <p>§ Ministry of Agriculture</p> <p>§ Agency for land management, geodesy and cartography</p> <p>§ The Sanitary Inspectorate under the Ministry of Health (SES),</p> <p>§ The Industrial Safety Inspectorate, and</p> <p>§ The Field Development Inspectorate</p> | This group will have a direct influence/impact on the Project through approving permits, providing certificates and enforcing new regulations and rules. | MoT PIURR to write official letters and e-mails, and undertake meetings with the permitting bodies when necessary. |
| Government Committees | <p>§ The Committee on Woman and Family Affairs (CWFA) under the Government of the Republic of Tajikistan will be involved and a communication link established between the CWFA, PIURR CLO and Jamoat CLOs.</p> | This group will have a direct influence/impact on the Project through providing a means for grievance and liaising with CLOs. | MoT PIURR to cooperate regularly with the CWFA and write official letters and e-mails, and undertake meetings when necessary. |
| Local authorities | Public/government land belonging to local authorities and other government departments (Hukumats, | This group will be affected indirectly as a result of the construction and operation activities. | MoT PIURR to cooperate regularly with the local authorities at these levels and write official letters and e-mails, and undertake |

¹⁴ The PCC will meet regularly, 3-month intervals suggested in the initial stages of project implementation, to resolve issues that are relevant to the overall Project, or to a Project component if the issue would also be relevant to the other components. These issues might be technical, safeguards, contractual, health and safety, schedule or any others that could impact on the Project achieving its objectives. The PCC would be chaired by the Minister or Deputy Minister for Transport, and would include the PIURR project director, representatives of the Financiers, the team leaders of the supervision consultants, and others relevant to the matters to be considered at a particular PCC meeting.

| Type | Name | Impact/Influence | Preferred Method of Engagement |
|---|---|--|---|
| | Jamoats and chiefs of villages). | | meetings with the local authorities when necessary. |
| Local Traffic Police | Local Traffic Police should be kept informed of Project developments to ensure continued support for the Project. | This group will be affected directly as a result of the construction and operation activities. | MoT PIURR to write official letters and e-mails, and undertake meetings when necessary. |
| Vulnerable Groups | The vulnerable groups within the Project area ¹⁵ are categorised as single woman-headed households with dependent children, large households with 5 and more children, old and frail without any support, households headed by disabled persons, households with a disabled member/s, poor people in receipt of social benefits who live nearby the road and youths/adolescents (particularly girls as suggested by UNICEF). | The vulnerable groups will be indirectly affected as a result of the construction activities: reduced access rights, reduced safety, dust and noise emissions. Direct impacts may include loss of homes, loss of employment as a result of loss of business, loss of livelihood as a result of loss of land and agriculture (including crops and animal husbandry). | MoT PIURR to conduct a meaningful consultation with the affected individuals to identify a best solution to improve their livelihood; or provide an alternative living area for them. Focus groups are preferred methods for engagement with this group. Separate males and females focus group discussions should be conducted. |
| Construction Worker Employees including migrant workers | Local people from nearby villages, workers and any migrant workers. | There will be potential job opportunities for local people from nearby villages and towns. Local women may feel threatened by migration of workers into the area as a result of the potential influx of workers. | MoT PIURR to facilitate a regular meeting with the impacted workers to address their concerns and issues. The Contractor to prepare a site-specific Contractor's Environmental and Social Management Plan (CESMP) which will describe the measures for the Contractor's/Subcontractor's workers while interacting with communities, especially with women. |
| Non-Government Organisations (NGOs) and international development agencies | UNDP is active in Tajikistan, focusing on improved governance, economic growth, protection of vulnerable groups and resilience and environmental sustainability. The website notes a number of local NGOs in the country although there is no knowledge of NGOs currently involved in the stakeholder engagement other than UNICEF. UNICEF will be involved in the Project with | UNDP will have direct impact/influence on promotion of environmental protection and development in the region. UNICEF will have direct impact/influence on education in the affected area with respect to the environmental, health, safety and social impacts of the proposed Project. | MoT PIURR to identify any NGOs which might be active in the area. |

¹⁵ Data on vulnerable groups was collected in September 2018 as part of the socio-economic survey at affected household level. The purpose is to identify particular groups that could potentially be affected by the Project and how they are affected so that appropriate measures can be taken to ensure these populations are not negatively impacted by the Project.

| Type | Name | Impact/Influence | Preferred Method of Engagement |
|---------------------|---|---|--|
| | respect to risks around child protection associated with the proposed Project. | | |
| Trade Unions | There are no trade unions currently established for this Project to protect labour/employee's rights. | Trade Unions have direct impact on protection of labour rights and promoting equality and non-discrimination. | MoT PIURR/ Construction contractor to conduct monthly meetings with trade unions (if these are established). |

4.2 STAKEHOLDERS IDENTIFIED DURING THE DEVELOPMENT OF THIS PLAN

The Project stakeholders identified at this stage are presented in Table 4, with an analysis of the best ways to engage with them according to the channels of communication that they are likely to use and will be most effective. The identification of relevant stakeholders is of crucial importance for the Project implementation process. The communities along the road will be directly affected by the Project.

Stakeholders that were not identified during this process should contact the PIURR or Jamoat CLOs or other members of the local Jamoat to request their addition to the list.

4.3 VULNERABLE GROUPS

Based on the EBRD definition of vulnerable people, this category includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Particular attention needs to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women-headed households and children, and those without legal titles to land, and ensure their participation in consultation events.

UNICEF has highlighted age specific vulnerabilities for youths and adolescents, particularly girls, which may be addressed by creating a platform for participation within the consultation process.

Vulnerable groups in the context of displacement also include people living below the poverty line, the landless, the elderly, women-headed households, children, ethnic minorities, or other displaced persons who may not be protected through national land compensation or land titling legislation.

According to the Project-specific entitlement matrix¹⁶, vulnerable groups are classified as: displaced persons (DPs) receiving government assistance for poor, single women-headed households below poverty line, elderly households, households with no means of earning a living, households headed by disabled person or other household members. CLOs will undertake face to face discussions at the household level to identify specific support to be provided. Focus groups (e.g. women-headed households, young people, etc) should be conducted to ensure affected vulnerable groups are informed about key impacts and also

¹⁶ The Project's entitlement matrix can be referred to Table E-2 in the Land Acquisition and Resettlement Plan (LARP).

consulted on livelihood restoration activities. This group will be further exposed to the Project impacts mainly resulting from the construction activities.

4.4 GENDER CONSIDERATIONS

Gender considerations have been taken into account while designing this SEP and the future engagement methods. Engagement activities are designed to allow for women to participate, i.e. there are accessible locations and timeframes that can accommodate family life and household responsibilities. There are multiple methods for women to get involved in consultations and provide feedback on different aspects of the Project. Women will be consulted on the Project activities, further details on consultation methods are provided in section 6.3.

The socio-economic assessment and consultations with the PAPs carried out for the Project in 2018 show that the lack of appropriate road infrastructure, lack of small feeder roads among rural areas as well as safety concerns with regards to children, restrict women's mobility (ADB, 2016).

Women's main economic activities in the Project's area are agriculture, animal husbandry, and home-based tailoring.

During the consultation meetings, women highlighted concerns regarding (1) the impact of the road's development and economic opportunities for local women, through both employment and entrepreneurship opportunities; (2) access to basic services for women and children, with poor social infrastructures (e.g. education, health) in the Project's area; (3) public transport modes to be developed around the new road and access roads.

The PIURR currently employs three social specialists, one environmental safeguards specialist and a gender specialist is expected to start working by the end of 2019. At least one social safeguards specialist and a gender specialist will be required to be female to enable better rapport with female members of the Project communities, higher women's responsiveness and support for the Project, and more effective participation of women in the Project managed by the PIURR. The Lenders will provide support to the PIURR and MoT for enhanced capacities on gender and infrastructure (including gender and road construction and maintenance) through a gender-responsive road development programme to promote economic opportunities for women through the enhanced road connectivity, with a focus on increasing women's access to services, entrepreneurship and skills.

The Programme will focus on four components:

- **(1) Gender-sensitive road design (supported by AIIB, EBRD, ADB)**

The MoT will integrate gender-sensitive measures in the design of the road for the provision of at least 2 side commercial areas/ rest stops for the main road for ADB and EBRD sections, 1 side commercial area/ rest stop for AIIB's section. The (at least) 3 side areas and rest stops will include specific space designated for women's entrepreneurship initiatives in the form of small bazaars, well-lit separate toilets and changing rooms, a small children and family care room. Access roads will also include adequate lighting, safe pedestrian spaces, road humps and roundabouts to provide for gender-sensitive road safety.

- **(2) Equal opportunities and women in construction in the scope of the Contractor (supported by AIIB, EBRD)**

The MoT will promote gender equality and equal opportunities-related policies and practices in the scope of the Contractor to promote women's participation in road construction and

maintenance through the inclusion of the CESMP, CoC, and GAP (see below). The MoT will promote the Project's gender achievements through active awareness-raising and linkages with VET institutions and Faculties of Engineering.

· **(3) Access to Skills and Entrepreneurship (supported by EBRD, ADB)**

EBRD and ADB will support the MoT in promoting skills development and entrepreneurship in the Project's area for women to capture the economic opportunities created by the new road and access roads development. This includes: pilot skills development with non-farm, farm and skills-based activities, including handicrafts; training and awareness-raising focused on women's opportunities, self-confidence and social understanding); basic financial literacy and entrepreneurship skills; the promotion of cooperatives of women entrepreneurs.

· **(4) Policy Dialogue on Gender and Transport (supported by EBRD)**

In line with the Project's achievements, the EBRD will support the development of policy capacities on gender and transport, with a focus on gender perspectives in sustainable infrastructure, gender-sensitive construction and public procurement, and gender-sensitive road commercialisation strategies. In addition, the EBRD support will aim at facilitating policy dialogue on labour obstacles to women's employment in the road, transport and construction sectors.

In terms of contractor requirements in relation to gender considerations, the Contractor is to prepare:

- (1) A site-specific CESMP which will describe the measures required for the Contractor's/Subcontractor's workers while interacting with communities, especially with women.
- (2) A gender-responsive Code of Conduct (CoC), integrating a comprehensive approach to the Protection against Sexual Harassment, Exploitation and Abuse (PSEHA) with provision of specific training to all staff and ensure full compliance with best practices on gender-sensitive conduct.
- (3) A Gender Action Plan (GAP) which will describe the affirmative measures required for the Contractor to promote women's employment for road construction and maintenance, integrate gender perspectives into construction practices, and prevent any additional GBV risks to emerge. The Contractor and PIURR will be supported by the Lenders' through the provision of gender advisory services to achieve enhanced targets for women's employment and gender perspectives in the Project.

5 EXISTING AND PREVIOUS STAKEHOLDER CONSULTATIONS

5.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

During the period of the Project the Transaction Technical Assistance (TRTA) Consultant and the PIURR conducted the following public consultations:

- § six consultations with the DPs and wider Project communities,
- § seven consultations in Hukumats and Jamoats authorities,
- § and four female focus group discussions.

In total, 163 persons (131 men and 32 women) participated in the consultations conducted in September and November 2018.

Participants received information about the Project, LAR processes, bidding process and expected time for the beginning of the works, as well as the Project Information Brochure detailing the Project-specific entitlements, government decree on the cut-off date, MoT letter on the establishment of the GRM and details on the GRM procedure. In addition, Project information was published in the local newspaper, aired on the main TV program and forwarded to two Hukumats and seven Jamoat authorities. The information was repeated at each consultation in the Project villages and at meetings with Jamoat and Hukumat authorities.

Following consultations with DPs and the broader community in Project Hukumats/Jamoats, focus group discussions (FGD) with women were conducted. There were four FGD with 30 participants, as the number of women that participated in consultations was limited and the FGD were not practicable to organize in some Hukumats/Jamoats. The main goals of focus groups discussions with local women were to give women a chance to share their opinions, concerns and suggestions in a more focused and friendlier environment.

In general, participants were supportive of the Project during the consultations. The questions and suggestions given by the participants during the consultations focused mostly on compensation, preferences for land-for-land compensation, safety for school children and crossings for animals. The participants also expressed their opinions about the adverse effects of the proposed Project. The main concerns were related to relocation, land-for-land compensation and process and timeframe for monetary compensation for losses. Participants provided suggestions of what they would like to see included into the Project planning and road design including; safe road crossings for people and animals, compensation and employment opportunities.

Apart from the formal notification requirements set in the Land Code of Tajikistan, there is no requirement for the government to discuss Project designs or possible Land Acquisition Resettlement (LAR) options with the DPs. Nevertheless, the local government authorities (Hukumats and Jamoats) disseminate to the local population all information issued in the form of a decree and other decisions related to the Project. In addition, the PIURR takes the lead in the co-ordination of information disclosure at the local levels and conducts consultations with the local population as per the IFI requirements.

The MoT PIURR will provide a summary report (table) of additional feedback on national EIA (OVOS) consultations once they have been undertaken and this SEP will be updated accordingly.

5.2 STAKEHOLDER MEETING DURING THE ASSESSMENT

The WSP social team conducted a visit in March 2018, where local consultation was undertaken with some residents of Degavillage in the Kamsamolobod Jamoat. The feedback provided on the Project was positive and consistent with engagement undertaken previously in September to November 2018. A summary of the key points which arose from the stakeholder meetings, interviews and observations in 2018 are summarised in Appendix 2.

6 STAKEHOLDER ENGAGEMENT PROGRAMME

6.1 DISCLOSURE OF INFORMATION

The types of information to be disclosed and the specific methods of communication to be undertaken by the local authorities for this Project are summarised in the Stakeholder Engagement Programme in Table 5. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the activities, performance, development and implementation of the Project. The information to be disclosed publicly are governed by EBRD's Public Information Policy and PR 10, AIB's Policy on Public Information, ADB's Public Communication Policy and Tajik national legislation.

6.2 STAKEHOLDER CONSULTATIONS AND INFORMATION DISCLOSURE

The stakeholder consultation and information disclosure will cover the following main tasks:

§ Timely disclosure of Project information to the key stakeholders. Project information will be available through local Jamoats and disseminated via the heads of local villages and in local community centres such as mosques, schools, medical centres, local bazaars/supermarkets, etc in the following locations:

- *Jamoat Obi-Garm*
Name: Shirinzoda Salima
Position: Chairman of Obi-Garm Jamoat
Phone No: 934475860
- *Jamoat Khakimi*
Name: Roziqov Mirzokhalil
Position: Chairman of Khakimi Jamoat
Phone No: 900029610
- *Jamoat Mudjikhraf*
Name: Roziev Zinatullo
Position: Chairman of Mudjikhraf Jamoat
Phone No: 985515257
- *Nurobod city*
Name: Bobiev Qumiddin
Position: Chairman of Darband Jamoat
Phone No: 918855438

§ Informed participation and meaningful two-way consultation with the affected stakeholders.

§ Development and implementation of a grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed.

6.2.1 INFORMATION DISCLOSURE ACTIVITIES

MoT PIURR will disclose relevant information about the investment work at the early stage of the Project during detailed design and then as appropriate throughout the Project. At this stage, the following documents will be disclosed for effective stakeholder communication:

- § Environmental and Social Impact Assessment (ESIA)
- § Social and gender assessment;
- § Non-Technical summary (NTS)
- § Stakeholder Engagement Plan (SEP)
- § Land Acquisition Resettlement Plan (LARP)
- § Environmental and Social Management Plan (ESMP)
- § Environmental Social Action Plan (ESAP)
- § Brochures/leaflets are to include a summary of Project activities, including timeline for expected disruption and access restrictions, and key associated risks.

All documents will be available in Russian and English languages, additionally the SEP, NTS and LARP will be available in the Tajik language.

The information above will be accessible to the public, including the affected communities during the duration of the Project. The hard copies of the related documents will be available at the MoT offices in fifth floor of the Ministry offices, 14 Aini Street, Dushanbe and online at www.ebrd.com and www.mintrans.tj.

The Project information, including potential job opportunities, will be advertised on bulletin boards in community centres and in the local media. Local Newspapers to be used to advertise the project and potential employment opportunities, as well as placing advertisements in the Jamoats. Brochures/ leaflets/postcards with key Project information and contact details will also be published to update the public about the Project progress and stages.

Hard copies to be made available at start of the disclosure period.

6.3 CONSULTATION METHODS

The main communication methods and mechanisms that will be used to consult with key stakeholders are largely described in Table 4, with additional recommendations provided below.

6.3.1 CONSULTATION WITH AFFECTED INDIVIDUALS AND VULNERABLE GROUPS

A number of consultations are recommended prior to the construction phase of the Project for affected individuals and vulnerable groups.

Further meetings with population along construction access roads are planned.

The Hukumats and Jamoats in the affected areas will play an important role in consultation with the affected community. In advance information and notification will be issued to the community prior to construction activities.

The details of the further consultation meetings are not yet finalised, these details can subsequently added to this SEP once known.

Women-specific engagements should be arranged (Section 6.3.2 below) with a woman leading the engagement meetings if possible. Advance communication is required to enable attendance, and women should be made aware that they may bring children with them if need be. Assisted transport should be provided to ensure inclusion for those less able to travel e.g. the elderly, pregnant women and people with disabilities. During the women specific engagements reference to the involvement of the CWFA at district level should be highlighted (Annex 1 provides contact details).

Discussions with UNICEF highlighted the need for further strengthening of the gender sensitive Project implementation process, and recommended employing a separate focus on

young and adolescent girls as their needs are specific and different. UNICEF further suggest consulting with girls, receiving their feedback and designing and implementing measures to address the gender related vulnerabilities. The PIURR will ensure that these recommendations are implemented during the Project lifecycle.

Further NGO contact details can be found in Annex 1.

6.3.2 FOCUS GROUPS

Specific focus groups will be conducted with the identified vulnerable groups, i.e. the disabled, women, informal people and people in receipt of social benefits. Further groups will be established by CLOs to cover road safety, camp locations, school and children's safety, cultural heritage and traffic management. A simple non-technical language will be used to ensure that the Project impacts are communicated transparently to this group.

6.4 THE FUTURE PROGRAMME – CONSTRUCTION PHASE

The envisaged programme of public consultation and disclosure activities are presented below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the Project life cycle.

Contact details and responsibilities for SEP implementation are as follows:

Name: TAVAROV SULAYMON
Title: Chief Specialist for Resettlement, PIURR
Telephone: +992 904 22 4711
Address: 14 Ayni Street, 4th Floor, Dushanbe, Tajikistan
Email: pirrr@tojikiston.com
Website: www.mintrans.tj

In addition, the Contractor will be required under their Contract to develop a CESMP, to include but not limited to provision of

- § Grievance mechanism
- § Notice boards for Project information disclosure
- § Traffic management plans
- § Further consultation and advance notice mechanisms related Project construction activities documented within a Contractor SEP programme; **a link to the Contractor SEP Programme will be added once provided.**

The Hukumats/Jamoats and the CLO will collate any comments, provide feedback and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within the 'Requirements' section provided in Section 3.4. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Stakeholder Engagement Programme is detailed Table 5 below.

ESIA disclosure programme (public meetings) to be agreed and aligned to national EIA process, including dates/locations/who is attending /how meeting will be promoted (including 'Gender' – women only meetings and vulnerable groups).

Means of disclosure will be confirmed, e.g. MoT Website, TV/Radio.

Table 5: Future Stakeholder Engagement Programme

| Activity | Stakeholders | Information Materials/ Communication methods | Information to be disclosed | Timeframe / Frequency | Responsibility | Location |
|--|--|---|---|-----------------------|----------------|--|
| Allocate a Project CLO in the region for each contract | Affected people, residents and employees of farms and villages | Information boards with post box, personal visits, community meetings. | NTS, grievance mechanism, vacancies, EIA, ESIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any) | Immediate | MoT PIURR | In the Project area/ region |
| Place hard copies of SEP and Project brochures/leaflets at MoT head office in Dushanbe and within Jamoat offices | Affected communities in villages of Bozorak, Kandak, Shohi Aslon, Chavchii Poyon, Sadokat, Layron, Siyagulak, Chepak, Muchiharfi Kalon, Degai, Tuhto, Tegermi, Pandovchi, Dehi Tag, Ulfatobad, Gulmon and Navobad. | Information board, mass media, internet, documents, face to face meetings at Jamoat offices | NTS, grievance mechanism, vacancies, EIA, ESIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any) | Immediate | Project CLOs | MoT head office and Jamoat offices |
| ESIA disclosure package | Affected communities – strategic villages | ESIA disclosure package disclosed at the following locations: | ESIA, LARP, NTS, SEP, ESAP, Project information brochures/leaflets | Immediate | Project CLOs | MoT head office and strategic Jamoat offices |

| Activity | Stakeholders | Information Materials/ Communication methods | Information to be disclosed | Timeframe / Frequency | Responsibility | Location |
|---|--|--|---|--------------------------------|---|---|
| | | § Jamoat Obi-Garm; § Jamoat Khakimi; § Jamoat Mudjikhharf; and § Nurobod city. | | | | |
| Communication of Project and potential job opportunities | Regional public | Newspapers, radio, internet, local centres; e.g. mosques, schools, local bazaars etc | NTS, grievance mechanism, vacancies | Prior to construction | MoT PIURR | MoT head office and Jamoat offices |
| Review and discuss Project environmental monitoring requirements with Ministry of Environment | Regional public | Telephone, e-mails, face to face meetings | Detailed Project information and NTS on request | Operation stage, then on-going | MoT PIURR | The ministry office |
| Consult and collaborate with local NGOs | Local NGOs | Telephone, newspaper, documents and meetings on request | Detailed Project information on NTS on request, location of bus stops, camps etc. | On-going | MoT PIURR | Jamoat offices |
| Hold regular community meetings at residential areas nearby the construction sites | Village area and district councils | Meetings, telephone, e-mail, information boards in council buildings, community meetings | EIA, EIA supplements, NTS, SEP, ESAP, vacancies, location of bus stops etc. | Immediate, then monthly | Project CLOs in collaboration with local Hukumats and Jamoats | Jamoat offices community meeting place (village mosques), if required |
| Communicate vacancies and workers' rights | Construction workers | Information boards and meetings in construction camp canteen | Vacancies, employee HR procedures etc | During the Project lifetime | MoT PIURR | Camps and offices |
| Facilitate focus groups and workshops for affected vulnerable groups, households | Vulnerable groups including informal people, | Face to face workshops, radio, round table meetings | SEP, Non-Technical Summary, Presentation of | Prior to construction/upgrade | Project CLOs in collaboration with Akimats | Village community centres or Jamoat offices |

| Activity | Stakeholders | Information Materials/ Communication methods | Information to be disclosed | Timeframe / Frequency | Responsibility | Location |
|--|--|--|---|---|---|---|
| near to construction, informal/illegal people, women, the disabled, pensioners regarding Project impacts | households located near the construction activities and women | | materials for vulnerable group | stage and during the Project lifetime | | |
| Community construction and Road Safety awareness raising programme | Herders for animal crossing arrangements, and children | Use of Flagmen, advance notice. Road safety awareness training in schools. | SEP, Non-Technical Summary, Project Information Brochure, Presentation of materials for vulnerable group | Prior to construction and operation | Contractor | Village community centres or Jamoat offices |
| Facilitate focus groups for relatives of road accident victims, particularly in respect of any monuments that may exist and are still cared and visited. | Families/ relatives of road accident victims whose monuments within the 40m-50m boundary of the construction of the road | Meetings, individual visits, telephone, emails | SEP, Non-Technical Summary | Prior to construction and during the Project lifetime | Project CLO in collaboration with Hukumats and Jamoats | Village community centres or Jamoat offices |
| Consult regularly with trade unions, NGOs, communities on promotion of labour rights and provision of employment opportunities for local people and human rights for migratory workers | Suppliers of goods and services | Information boards | NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection requirements, grievance mechanism | Prior to construction phase and on-going | Project CLOs in collaboration with HR Department of MoT and Trade Unions (if established) | Jamoat offices |

7 REPORTING ROLES AND RESPONSIBILITIES

7.1 MONITORING, REPORTING AND FEEDBACK MECHANISMS

Independent consultants will be used for annual monitoring of the ESAP implementation that should also undertake annual monitoring of the SEP implementation including the implementation of the grievance mechanism. This will include the examination of documentation on public meeting, information disclosure, media and any other form of stakeholder engagement undertaken as part of the SEP.

In addition, the MoT will be required to self-report to the EBRD and IFIs under contract to report on the environmental, health, safety and social performance of the Project. The reporting format will be agreed with the IFIs on agreement of the contract.

8 GRIEVANCE PROCEDURES

8.1 GRIEVANCE MECHANISM

The Jamoats and the CLOs will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. An open book will be available for stakeholders participating in public consultation meetings and will be available at the Jamoat offices to record comments both anonymously and with the option to provide contact details. This book will be presented in an obvious area of the exhibition but in an area, that will not be directly monitored by host staff (e.g. by the exit). The Hukumats and Jamoats and the CLO will record this information so that a response and feedback can be provided for those stakeholders that provide contact details. It should be made clear to those recording comments that a response cannot be provided to anonymous comments.

According to the Tajikistan legal and administrative structure disagreements are resolved through Hukumats'/Jamoats' grievance mechanism or appeal to court. The intended officials were appointed to these positions to assist in submission and resolution of grievances or complaints, received from the Affected persons and the public.

The complaint procedures related to the Project, are to ensure efficient and systematic mechanism for the Project to answer questions, to provide feedback against complaints from those whose interests are affected, other stakeholders and the public.

Levels and procedures of grievance mechanism

The grievance mechanism (GM) is available for those who live or work in the areas falling under the impact of the Project activities. Anyone who has experienced impact and is concerned by the Project activity has the right to participate in the GM, to have an easy access to it and receive assistance in its use. The proposed GM does not replace the public mechanisms for resolving grievances and conflicts, provided by the legal system of the Republic of Tajikistan, but tries to minimize its use as much as possible.

It should be noted that although multiple methods for raising grievances are highlighted below, all grievances will be addressed in the same way and the process will be consistent across the alignment.

Overall responsibility for the timely implementation of the GM lies on the MoT PIURR. Relevant Hukumats and Jamoats, authorized by the law to carry out tasks, related to the complaints, and mediators / non-governmental organizations (NGOs) that are involved in promoting the amicable resolution of complaints, are also included in the GM.

The MoT require the establishment and development of the GRM at the Jamoat level. Grievance Redress Committees (GRCs) have been established at the village level in each Project village, with 17 GRCs at this level.

At the first phase, an attempt will be made to resolve complaints via the GM at the regional level through the following steps:

- § Grievances can be lodged with the Focal Person at the village GRC. The village FP, in consultations with the PIURR safeguard specialist, will screen the grievance for eligibility. If eligible, the FP will organize a meeting of the Grievance Redress Committee (GRC). The PIURR representatives will be informed and invited to the meeting. A flow chart highlighting the complaints procedure can be found in Figure 8.

- The option to submit grievances anonymously should be available to complainants using the public grievance form (Figure 9). It should be made clear to complainants submitting anonymous complaints that it will not be possible to provide a response.
- § The complaint registered with the GRM should be reviewed (with a letter of receipt/acknowledgment to complainant), the date should be recorded on the complaints log (appendix 1). The complaint should be assigned to a responsible person, addressed and a decision made on its relevancy to the Project within 14 calendar days of lodgement. If the case is complex or requires more detailed investigation (e.g. inspection by technical experts or legal opinion from the state or certified private entities) the complaint review period may be extended to 30 calendar days or more, if necessary. In such cases, written notification should be sent to the complainant explaining the reasons for extension, describing the process and indicating the expected dates for the delivery of the results of the revision.
- § All supporting documents such as, photographs, related certificates and legal and technical expert opinions, if required, should be prepared, reviewed and assessed. Once the complaint is resolved, the GRC will organize a complaint closure meeting, where the complainant confirms the closure of the complaint. The PIURR representative will oversee the resolution of the complaint.
- § All efforts will be made to settle issues at the village/Project level. All complaints and resolutions will be properly documented by the PIURR and made available for review, monitoring and evaluation purposes. A PIURR safeguard specialist keeps in regular contact with the FP of the GRCs and will have a database for the whole Project's grievances cases, including the status of grievances. This report will be regularly included in monthly Project progress reports.
- § Regardless of the set grievance mechanism and procedures, DPs will have the right to submit their cases to a court of law at any point in time of the grievance redress process. All efforts will be made to settle the issues at the Project level through community consultation with affected person. If not possible, attempts will be made to resolve the issues at the PIURR level to avoid/minimize litigation as much as possible.
- § In addition, the complainant can appeal the decision and bring the case to the IFI's Accountability Mechanism (AM) or Project Complaint Mechanism (PCM). The GRM at the Project level does not in any way impede the DPs' access to the IFI's AMs. If DPs want to register a complaint, the PIURR Focal Person will provide the complainants with the relevant contact information for each section.
- § ADB AM
 - ADB AM accessed via www.adb.org/site/accountability-mechanism/main
 - EBRD PCM accessed via <https://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism.html>
 - AIIB policy on the Project-affected people's mechanism can be accessed via <https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html>
- § Complaints may also be made directly to the contractor, using the contractors GRM process:

Reference to the Contractor's GRM process once known will be added to the SEP, including 24 hour hotline. The GM needs to be consistent no matter how the

grievance is lodged, so the contractors' GM needs to build upon the one in this document.

- § GRM proceedings may need one or more meetings for each complaint and may require field investigations by specific technical or valuation experts. Grievance cases shared by more than one complainant may be held together as a single case.
- § For appeals lodged directly to the MoT, the FP at PIURR will review the case together with the respective GRC at the village level and attempt to find a resolution together with the aggrieved person.
- § At each level of appeal, the GRC will be assisted, as required, by the professional capacity needed to solve specific cases.
- § There is one woman and one DPs representative in each GRC, female contacts are highlighted with the colour blue in the tables in Annex 2.

Technical Experts

When requested by the PIURR to provide technical expertise for the assessment of an impact claimed by the complainant, the relevant expert will:

- examine the case, perform relevant tests or an investigation;
- prepare a short report based on the results of the examination completed;
- recommend if further or additional legal opinion or expertise is needed to make a judgment on the substance of the case.

GRC Complaint Register, Records and Documentation

The PIURR of the MoT will maintain the complaints register. This will include a record of all complaints for regular monitoring of grievances and results of services performed by the GRCs for periodic review by the ADB.

Co-ordinators on complaints:

The affected individuals and other interested parties may visit, call and send a letter to the following persons at the PIURR:

| ABDUVOHIDZODA, ERAJ | TEMURZODA, SHERALI | TAVAROV, SULAYMON | EBRD TAJIKISTAN CONTACTS |
|---|--|---|--|
| Deputy Executive Director, Project Implementation Unit for Roads Rehabilitation 14 Ayni Street, 4 th Floor, Dushanbe. Tajikistan Tel: +992 90 555 6060 Email:pirrr@tojikiston.com | Chief Specialist for Resettlement, Project Implementation Unit for Roads Rehabilitation 14 Ayni Street, 4 th Floor, Dushanbe. Tajikistan Tel: +992 907 82 84 85 Email:pirrr@tojikiston.com | Chief Specialist for Resettlement, Project Implementation Unit for Roads Rehabilitation 14 Ayni Street, 4 th Floor, Dushanbe. Tajikistan Tel: +992 904 22 4711 Email:pirrr@tojikiston.com | Resident Office of EBRD in Republic of Tajikistan 34 Rudaki Avenue, TCELL Plaza, 12 floor 734025 Dushanbe, Tajikistan Tel: +992 (37) 2 210763; 2213 543; 2216709; 2216718; 2219832; 2510178; 2512424 |
| MAHMUDJON KHOLIKOV | IBROHIM KURBONAL | SAFARMAD YORMATOV | |
| Tel: 987 131001 | Chief Environmental Specialist. Tel: 901 20 00 23 | Chief Specialist on Social and Environment Tel: 902 20 32 09 | |

8.2 ROLES AND RESPONSIBILITIES

The client and the CLO in collaboration with local authorities will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments/complaints and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some comments or complaints will be provided to the appropriate person in the authorities for a response.

Contact Details of the CLO:

Name: TAVAROV SULAYMON
Title: Chief Specialist for Resettlement, PIURR
Telephone: +992 904 22 4711
Address: 14 Ayni Street, 4th Floor, Dushanbe, Tajikistan
Email: pirrr@tojikiston.com
Website: www.mintrans.tj

Figure 3 Grievance Procedure

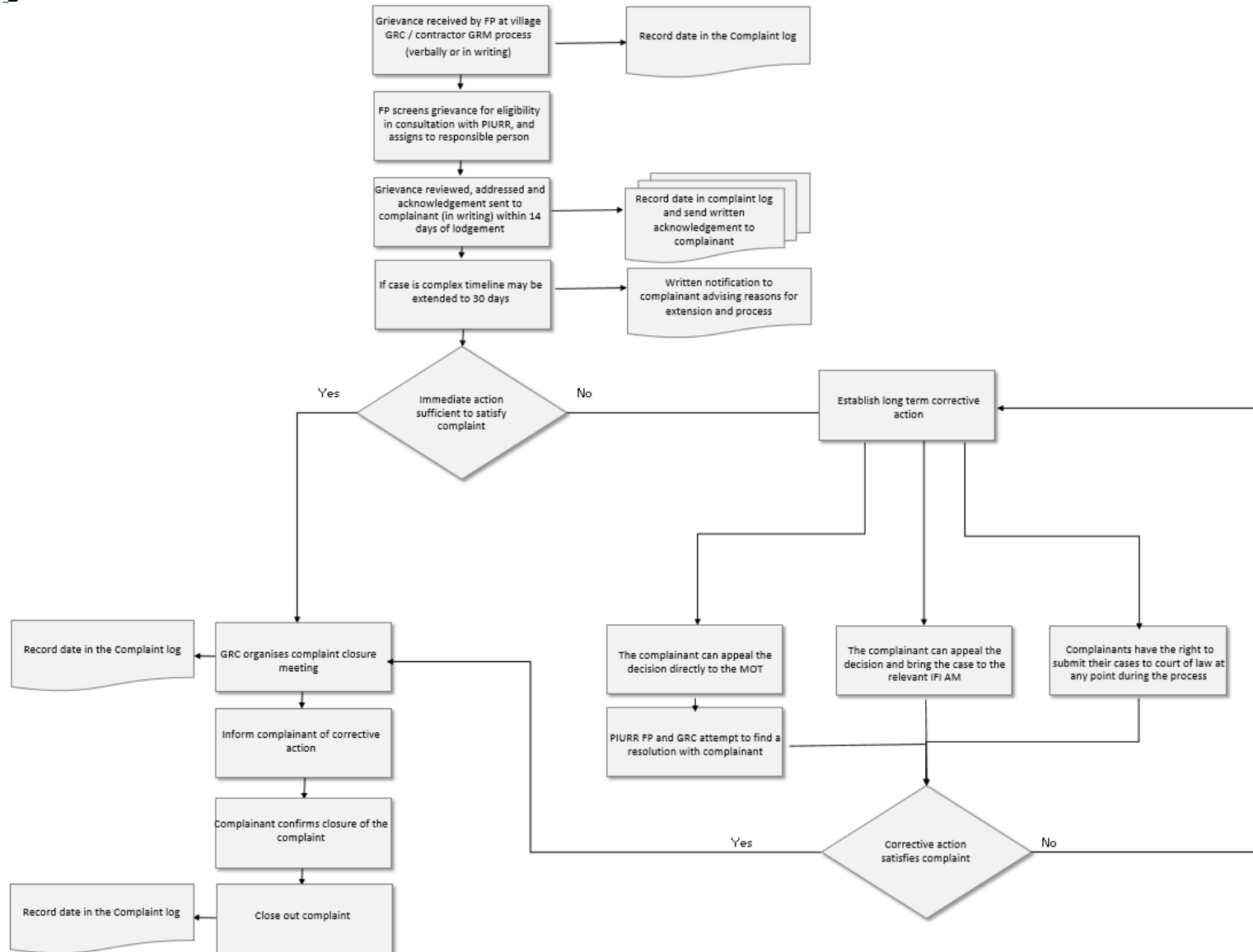


Figure 9 Public Grievance Form

| | |
|---|--|
| GRIEVANCE REGISTRATION FORM | |
| CONTACT INFORMATION | |
| Name: | Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female |
| Address: | |
| Community: | Telephone: |
| Jamoat: | E-mail: |
| Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No | Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail |
| DESCRIPTION OF GRIEVANCE / SUGGESTION / QUESTION | |
| Please provide details (who, what, where, when) of your grievance below: | |
| In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any): | |
| Please provide details on your suggested resolution for grievance: | |
| GRIEVANCE REGISTRATION DETAILS | |
| Name of registrant: | |
| Organization: | Position: |
| How the grievance was lodged: <input type="checkbox"/> in person / <input type="checkbox"/> mail / <input type="checkbox"/> e-mail / <input type="checkbox"/> phone / <input type="checkbox"/> fax / <input type="checkbox"/> _____ | Type of grievance: <input type="checkbox"/> type A / <input type="checkbox"/> type B / <input type="checkbox"/> type C |
| Documents attached: | Grievance is relevant to Project: <input type="checkbox"/> Yes / <input type="checkbox"/> No if "No" it was forwarded to: _____ |
| Remarks: | |
| Signature of registrant: | Date of grievance: |

ANNEXES

ANNEX 1

NGO Contact Details

| Organisation | Contact / Role | Address | Email | Tel: |
|--------------------|--------------------------|---|--|--|
| UNDP Tajikistan | | Dushanbe Country Office: 39 Aini Street 734024 Dushanbe | registry.tj@undp.org | +992 44 600 56 00 |
| CWFA Nurobod | Shakhnozai Shukrihudo | CWFA Nurobod district, Darband town, Ismoili Somoni Street 21 | drnurobod@mail.ru shahnoz-mzb@mail.ru | +992 91 740 00 45 phone/fax 83 133 3 01 02, 3 00 39, 3 00 97 |
| CWFA Rogun City | Ramazonova Mukaddas | CWFA Rogun city Office, Sokhtmonchiyon street, House 54. | zanonrogun@mail.ru | Mobile +992 93 829 1666 office:3134 2 11 44 |
| UNICEF | Yusuf Bafozoda | UNICEF Tajikistan 5/1 Lohuti St., Dushanbe | ybafozoda@unicef.org | Office: +992 44660190 Mobile: +992 939998917 |

ANNEX 2

The following persons at the village level are responsible for the Project-related inquiries and grievances for Section 1 and Section 2 of the alignment. The names highlighted in bold and italic are women contacts.

Section 1 contacts:

Grievance Redress Committee Bozorak Village, Obigarm Jamoat, Rogun City

| No | Name | Position | Address | Telephone |
|----------|--------------------------------|----------------------------------|-----------------------|------------------------------|
| 1 | Salimov Muhiddin | Jamoat's deputy head | Obigarm | 938 33 29 78 |
| 2 | <i>Kholova Guljahon</i> | <i>Jamoat's secretary</i> | <i>Obigarm</i> | <i>8 31 34 616 30</i> |
| 3 | ShukuloevFaizali | Tax inspector of village | Obigarm | 937 37 03 01 |
| 4 | Gafurov Mahmadi | Head of Bozorak village | Obigarm | 935 41 99 06 |
| 5 | Kholov Ihlosiddin | Resident of Bozorak village | Obigarm | 938 78 06 56 |

Grievance Redress Committee Kandak (Ghurung) village, Obigarm Jamoat, Rogun city

| No | Name | Position | Address | Telephone |
|----------|--------------------------------|--------------------------------------|-----------------------|------------------------------|
| 1 | Shirinzoda Saima | Head of Jamoat | Obigarm | 93 447-58 60 |
| 2 | <i>Kholova Guljahon</i> | <i>Jamoat's secretary</i> | <i>Obigarm</i> | <i>83 13 46 16 30</i> |
| 3 | Rajabov Mehribon | Representative of Kandak village | Obigarm | 918 31 82 18 |
| 4 | Ismatov Mahmadyusuf | Head of Kandak(Ghurung) village | Obigarm | 938 89 19 66 |
| 5 | Jalilov Murtazo | Resident of Kandak (Ghurung) village | Obigarm | 931 81 03 02 |

Grievance Redress Committee Shoi Aslon Village, Sicharogh Jamoat, Rogun City

| No | Name | Position | Address | Telephone |
|----------|-----------------------------|---|-------------------------|----------------------------|
| 1 | Shamsov Odil | Head of Jamoat | Sicharogh | 554 559 994 |
| 2 | Nazrulloev Sunatullo | Jamoat's land surveyor | Sicharogh | 906 22 6116 |
| 3 | Yokubov Safi | Head of Shoiaslon village | Sicharogh | 900 99 61 99 |
| 4 | <i>Saidova Sevar</i> | <i>Resident of Shoiaslon village</i> | <i>Sicharogh</i> | <i>884 40 84 09</i> |
| 5 | Dustov Mustafo | Resident of Shoiaslon village | Sicharogh | 93 850 53 53 |

Grievance Redress Committee, Javchi Poyon, Hakimi Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----------|---------------------------------|--|----------------------|----------------------------|
| 1 | Rozikov Mirzohalil | Head of Jamoat | Hakimi | 907 70 93 23 |
| 2 | Buriev Dilmurod | Jamoat's secretary | Hakimi | 909 09 08 11 |
| 3 | <i>Samadova Gulbahor</i> | <i>Resident of Javchi Poyon village</i> | <i>Hakimi</i> | <i>918 97 27 46</i> |
| 4 | Shobudinov Malaboi | Head of Javchi Poyon village | Hakimi | 988 57 56 21 |
| 5 | Safarov Saidbek | Resident of Javchi Poyon village | Hakimi | 909 77 66 47 |

Grievance Redress Committee, Sadohat Village, Hakimi Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----------|--------------------------------|---|----------------------|----------------------------|
| 1 | Rozikov Mirzohalil | Head of Jamoat | Hakimi | 907 70 93 23 |
| 2 | Buriev Dilmurod | Jamoat's secretary | Hakimi | 909 09 08 11 |
| 3 | <i>Sharipova Gulfar</i> | <i>Resident of Sadohat village</i> | <i>Hakimi</i> | <i>918 71 73 43</i> |
| 4 | Ismonov Zoirhuja | Head of Sadohat village | Hakimi | 985 11 43 95 |
| 5 | Azimov Jonibek | Resident of Sadohat village | Hakimi | 909 94 88 37 |

Grievance Redress Committee, Layron Village, Hakimi Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----------|---------------------------------|--|----------------------|----------------------------|
| 1 | Zuhurov Mahmadali | Jamoat's deputy head | Hakimi | 900 90 98 28 |
| 2 | Buriev Dilmurod | Jamoat's secretary | Hakimi | 909 09 08 11 |
| 3 | <i>Yokubova Khosiyat</i> | <i>Resident of Layron village</i> | <i>Hakimi</i> | <i>900 97 84 45</i> |
| 4 | Avghonov Rahim | Head of Layron village | Hakimi | 985 70 38 91 |
| 5 | Miyansarov Salomatsho | Resident of Layron village | Hakimi | 553 553 775 |

Grievance Redress Committee, Siyahgulak Village, Hakimi Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|---------------------------|---------------------------------------|---------------|---------------------|
| 1 | Zuhurov Mahmadali | Jamoat's deputy head | Hakimi | 900 90 98 28 |
| 2 | Buriev Dilmurod | Jamoat's secretary | Hakimi | 909 09 08 11 |
| 3 | Karimova Gulrafter | Resident of Siyahgulak village | Hakimi | 907 34 43 11 |
| 4 | Gadoev Izat | Resident of Siyahgulak village | Hakimi | 918 30 40 38 |
| 5 | Saidov Hamid | Resident of Siyahgulak village | Hakimi | 985 13 57 69 |

Section 2 contacts:

Grievance Redress Committee, Chepak Village, Mujiharf Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|--------------------------|--------------------------|-----------------|--------------------|
| 1 | Roziev Zinatullo | Head of Jamoat | Mujiharf | 985 51 52 57 |
| 2 | Aliev Karamatullo | Agricultural unit Jamoat | Mujiharf | 988 19 66 61 |
| 3 | Makhsudova Maksad | Teacher | Mujiharf | 987 487 359 |
| 4 | Hakimov Soleh | Head of Chepak village | Mujiharf | 918 85 54 18 |
| 5 | Ghaniev Davlatsho | Chepak village resident | Mujiharf | 900 09 73 57 |

Grievance Redress Committee, Mujiharfi Kalon Village, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|-------------------------|-----------------|---------------------|
| 1 | Roziev Zinatullo | Head of Jamoat | Mujiharf | 985 51 52 57 |
| 2 | Abdulhaev Izomiddin | Sarhatib | Mujiharf | 918 84 54 13 |
| 3 | Habibov Rahmonali | Teacher | Mujiharf | 918 55 75 15 |
| 4 | Saiumarov Manzar | Head of village | Mujiharf | 901 40 70 13 |
| 5 | Yunosova Sadbarg | Village resident | Mujiharf | 981 07 37 05 |

Grievance Redress Committee, Degavillage, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-----------------------|----------------------------------|---------------------|---------------------|
| 1 | Jalilov Mahmadsidik | Head of Jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Zaidov Samariddin | Jamoat land surveyor | Komsomolodod | 918 23 64 14 |
| 4 | Jobirov Dodarjon | Head of Degai village | Komsomolodod | 934 88 89 83 |
| 5 | Imonova Sumbul | Resident of Degai village | Komsomolodod | 985 27 36 35 |

Grievance Redress Committee, Tutkhor Village, Mujiharf Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------------|------------------------------------|---------------------|---------------------|
| 1 | Jalilov Mahmadsidik | Head of Jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Teshaev Asadullo | Resident of Tutkhor village | Komsomolodod | 987 14 57 83 |
| 4 | Masudov Saimahmud | Head of Tutkhor village | Komsomolodod | 918 81 98 29 |
| 5 | Kalandarova Mehrinigor | Resident of Tutkhor village | Komsomolodod | 987 96 56 57 |

Grievance Redress Committee, Tegermi Village, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-----------------------|------------------------------------|---------------------|---------------------|
| 1 | Jalilov Mahmadsidik | Head of Jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Kayumova Idimo | Resident of Tegermi village | Komsomolodod | 981 05 07 08 |
| 4 | Ghayratov Kishvar | Head of Tegermi village | Komsomolodod | 918 61 35 66 |
| 5 | Burov Muhiddin | Resident of Tegermi village | Komsomolodod | 985 12 30 90 |

Grievance Redress Committee, Pandovchi Village, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|--------------------------------------|---------------------|---------------------|
| 1 | Jalilov Mahmasidik | Head of Jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhidin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Kurbonova Mahina | Resident of Pavdonchi village | Komsomolodod | 918 52 81 88 |
| 4 | Isroilov Nazrihuja | Head of Pavdonchi village | Komsomolodod | 918 09 85 32 |

| | | | | |
|---|--------------------|-------------------------------|--------------|--------------|
| 5 | Uzbekov Ilhomiddin | Resident of Pavdonchi village | Komsomolodod | 985 03 36 23 |
|---|--------------------|-------------------------------|--------------|--------------|

Grievance Redress Committee, Dehi Tag Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------|-------------------------------------|-----------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Dehi tag | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Dehi tag | 981 08 07 19 |
| 3 | Amonatov Karimbek | Head of Dehi tag village | Dehi tag | 918 18 72 62 |
| 4 | Yatimova Munira | Resident of Dehi tag village | Dehi tag | 918 38 79 54 |
| 5 | Eshonov Dodarjon | Resident of Dehi tag village | Dehi tag | 918 53 40 37 |

Grievance Redress Committee, Ulfatobob Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|---------------------------------------|------------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Ulfatobob | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Ulfatobob | 981 08 07 19 |
| 3 | Holmatova Sobira | Resident of Siyahgulak village | Ulfatobob | 918 38 57 50 |
| 4 | Mirzoev Sharifoja | Head of Ulfatobod village | Ulfatobob | 918 90 80 44 |
| 5 | Mahmadov Khurshed | Resident of Ulfatobod village | Ulfatobob | 985 27 24 90 |

Grievance Redress Committee, Gulmon Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|-----------------------------------|---------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Gulmon | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Gulmon | 981 08 07 19 |
| 3 | Hasanova Nazokat | Resident of Gulmon village | Gulmon | 918 24 31 18 |
| 4 | Hasanov Shomahmad | Head of Gulmon village | Gulmon | 93 882 27 67 |
| 5 | Safiev Shamsiddin | Resident of Gulmon village | Gulmon | 918 55 91 84 |

Grievance Redress Committee, 7th Microrayon of Darband Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------|-------------------------|---------------------|---------------------|
| 1 | Bobiev Kumuddin | Head of Jamoat | Darband city | 918 85 54 38 |
| 2 | Pudinaev Jamshed | Jamoat's secretary | Darband city | 985 31 13 51 |
| 3 | Loikov Dodarjon | Head of village | Darband city | 981 04 64 50 |
| 4 | Jomiev Sudur | Village resident | Darband city | 985 32 13 72 |
| 5 | Hakimova Sojida | Village resident | Darband city | 988 66 20 47 |

Appendix 1 – Grievance Log

The following template will assist in recording comments, complaints and grievances for monitoring purposes.

| Name/Contact details | Date received | Details of complaint/comment | Responsibility | Actions taken | Date resolved |
|-----------------------------|----------------------|-------------------------------------|-----------------------|----------------------|----------------------|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

Appendix 2: Questions and Answers at Consultations with Communities

| No | Questions/Discussions | Answers |
|----|---|---|
| 1 | When will the construction start? | We expect that construction will start in the first quarter of 2019. |
| 2 | We have water pipes located along the road and some across the road. Will you ensure that our water system is not damaged? | Water pipes, electricity and any other utilities will be relocated before the road construction starts. The contractor or subcontractor will inform you well in advance when these works are planned and the length of any disruption to these services. |
| 3 | How will you compensate affected businesses? | As explained, you will get a new location to rebuild your petrol station. All buildings and structures will be compensated at replacement cost which will enable you to build a new petrol station of the same size/quality. You will be entitled to some social safeguards allowances such as an allowance for seriously affected persons, a transport allowance and any other applicable allowances as per the entitlement matrix. |
| 4 | Agha Khan Foundation supplies water for us. The pipes go along this road. Please do not destroy it during the construction. Please ensure that contractor does not cut our pipes. | All village utilities along the road will be safely relocated. You may experience some disruption of services during the relocation of water pipes or power poles. The contractor should inform the population in advance about dates and times planned for the relocation. |
| 5 | How will you calculate compensation for empty homes? | The compensation will be calculated at replacement cost. If the house is empty, there is no need to organize transport of household belongings, and rental allowances will not be required. These might be the only differences between allowances for inhabited and non-inhabited houses. |
| 6 | How will our cows cross the road? | There are no animal underpasses envisaged by the design. We will recommend the construction of animal crossings. Otherwise, the livestock will move across the road. |
| 7 | How will children cross the road? Will you have pedestrian crossings or traffic lights? | In each settlement/village, there will be a footpath, pedestrian crossing and speed bumps. |
| 8 | My house is affected. I walked 7 km to hear what you have to say about the Project. Please tell me where we should go. | We will come to your house tomorrow to complete the DMS and SES studies. As you heard, the compensation will be calculated based on replacement cost, which means that from the money received, you should be able to rebuild a similar house without spending any additional money. All other assets will be compensated according to the same principle. You will receive replacement land from the Jamoat and you are entitled to allowances such as an allowance for severely affected persons, a transport allowance, a three month rental allowance, and possibly a vulnerability allowance once we complete the SES questionnaire. |
| 9 | My husband is in Russia too. When compensation is paid, should he come here? | This is not absolutely necessary. He may give you, or anyone else, certified authorization to collect the compensation money on his behalf. |
| 10 | We have a lot of fruit in our village but sometimes when people come to purchase fruit here, they pay so little. | |

| No | Questions/Discussions | Answers |
|----|---|---|
| | They pay us TJS 2/kg of apples or TJS 6/kg for walnuts. Sometimes we go to the bazaar and sell some fruit. We have good honey too but we rarely sell as there is not enough for us. | |
| 11 | What would happen if something is damaged during construction? | If your property is damaged during the construction, the procedure for compensation based on replacement cost applies. |
| 12 | What should we do if the contractor deposits soil surplus on our properties? You see how steep it is here, and the contractor may just dump soil toward our land-plots. | The Contractor will have to arrange and agree with local authorities about locations where any surplus material will be deposited. The contractor will not be allowed to dispose of any surplus material on private properties without an agreement with the local authorities and the property owner. |
| 13 | If we have a complaint about the Contractor, to whom should we complain. | You'll have a GRC established at the Jamoat level and you may lodge your complaint there. Also, there will be a construction supervision company and you may complain to the site engineer. |
| 14 | We are very happy that you came. We do not believe that the road will be constructed. We have been hearing about that road for years! | The road will be constructed. We expect construction to start in the first quarter of 2019. |
| 15 | You are acquiring my son's house. He will not have enough land to make a new house. When you pay compensation, will he be able to purchase an apartment in Dushanbe? | The Jamoat will replace your land. The valuator will calculate a replacement cost for a new house and other structures and assets affected. In addition, you will receive an allowance for seriously affected persons, transport of the household's belongings, three months' accommodation cost while you build your new home and any other applicable allowances as per the entitlement matrix enclosed here with the Project information brochure. However, I am not sure if for the compensation amount your son could purchase an apartment in Dushanbe. |
| 16 | There will be a lot of dust during the construction. You can see we have so much dust even without construction. | The Contractor will be obliged to sprinkle water during the construction and thus, minimize the effects of dust. |
| 17 | If the contractor does not sprinkle water, what should we do? We saw on some other Project how much dust they make. | A GRC will be established at the Jamoat level and you can lodge your complaint there with your Rais or any other designated grievance redress committee member. In addition, there will be a construction supervision company and you may complain to the site engineer. |
| 18 | There were people before you. They came, asked the same questions and measured our properties. | Yes, you had a resettlement specialist from the design company. They made a general list of displaced persons and their assets. This team will measure exactly everything that is going to be affected by the Project. You will be with us when we measure affected land, structures, count affected trees, etc. A valuation will be done and compensation calculated based on our inventory of losses, |
| 19 | Some people that are affected are not on your list and some people who are on your list, do not live in our village. | We have a topographer with us and we will determine what is going to be affected. Affected assets of those DPs who are not on the list will be documented and the DPs will be added to the list of displaced persons. |
| 20 | Will everything that is affected, paid for? | Yes, except unauthorized use of land. However, any structure, land improvement or fruit trees on such land, will be compensated for. |

| No | Questions/Discussions | Answers |
|----|---|--|
| 21 | If we have a complaint should we go to the Raisi Jamoata? | There will be a grievance redress committee at the Jamoat level and Rais Jamoata, as well as Rais Mahale. You may lodge your complaint to the GRC focal person or any other GRC member. |
| 22 | During the SES and the DMS, who will be present? | Social safeguards specialists, raisi mahale and the Jamoat's representatives will be present. |
| 23 | How will you pay for the fruit trees? | All affected fruit trees will be compensated. Compensation will reflect income replacement. Cash compensation for productive trees is based on the net market value of 1 year of income multiplied by the number of years needed to grow a tree to a similar level of productivity, plus the purchase price of saplings and starting materials. The DP will keep the tree. |
| 24 | If the water pipes are affected during the construction, who will pay for the damages? | During the construction, a plan for relocation of all pipes, communication cables, electricity poles etc, will be prepared. All these amenities will be relocated where necessary. The contractor will repair any damage resulting from the construction activities. |
| 25 | When will you pay us for our affected assets? | All compensation will be paid before the Contractor starts the works. |
| 26 | Will there be some opportunities for women to work as cooks, bread bakers, cleaners etc during the road construction? | Yes. We will inform you about positions which will be needed by the Contractor. |

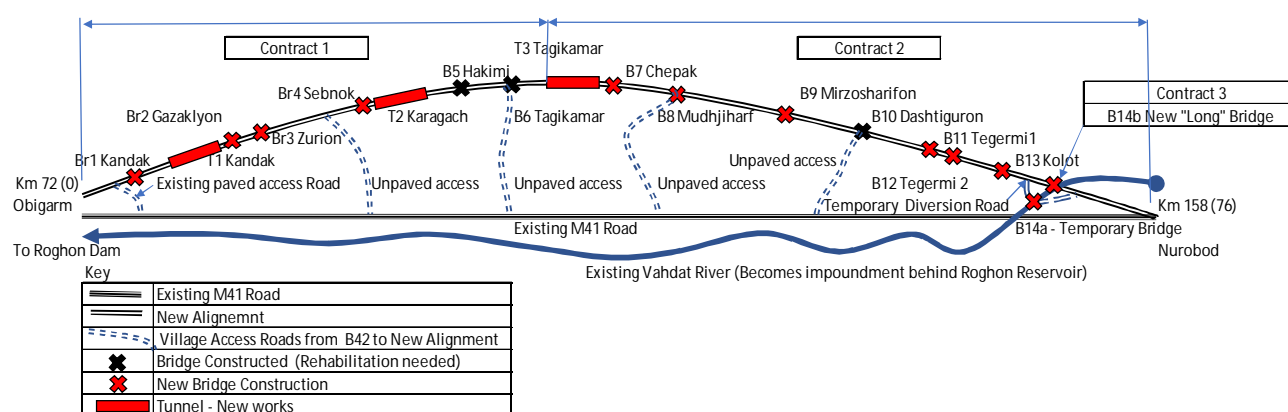
Appendix 3 – One Page Project Information Brochure for Section 2

Summary of project activities:

The proposed Obigarm - Nurabod Road Project (also referred to as the Rogun Bypass road) aims to construct an approximately 75 km road for the existing M-41 road connecting the northeast region of Tajikistan and the Kyrgyz Republic between Obigarm (72 km) and Nurobod. The existing M-41 road will be flooded to create the reservoir of the Rogun Hydropower Project (HPP), that is now under construction.

The Project road is divided into three sections. The second section is being funded by the European Bank for reconstruction and Development (EBRD). Section two starts at Mudzhiharv and continues through Alihodzha, Tuthor, Kabudiyon (Samsolik), Humdon, and the temporary bridge over the Rogun HPP Reservoir at Darband over the Surkhkhob River (as shown in the diagram below).

Project Alignment Showing Location of Bridges, Tunnels and Access Points



Timeline for expected disruption and access restrictions:

<<to be updated with dates and restrictions once known>>

Key associated risks:

Potential environmental and social risks that are associated with (but not limited to) the Project are listed below.

- § Pollutants and emissions to atmosphere from construction and use of vehicles;
- § Noise and vibration from use of road construction processes;
- § Pollution of surface water from road vehicles, filling of vehicles with fuel and oils etc;
- § Pollution of soil during the construction period due to spillages of lubricating material, fuel, bitumen etc.;
- § Dust pollution during construction works;
- § Local discomfort and nuisance to families, women and the elderly;
- § The risks of collisions and accidents involving persons;
- § The risks of collisions and accidents with domestic animals;
- § Local disturbance associated with construction workers;
- § Impact on women's safety resulting from migration of workers into the area; and
- § Planning for the demolition of buildings and removal or repositioning of utilities.

Grievance redress mechanism procedure (including contact details) for Section 2 of the Project road:

There are multiple methods for raising complaints or grievances. All grievances will be addressed in the same way and the process will be consistent across all sections of the Project alignment. Complaints can be raised anonymously, however it should be noted that if complaints are raised anonymously then a response cannot be provided to the complainant.

Complaints can be raised via the Grievance Redress Committee at the Jamoat level using the contacts provided below. A woman contact is available within each village for other women to reach out to. The following persons at the village level are responsible for Project-related inquiries and grievances, with female contacts highlighted in bold and italic.

Grievance Redress Committee, Chepak Village, Mujiharf Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|---------------------------------|--------------------------|------------------------|---------------------------|
| 1 | Roziev Zinatullo | Head of jamoat | Mujiharf | 985 51 52 57 |
| 2 | Aliev Karamatullo | Agricultural unit jamoat | Mujiharf | 988 19 66 61 |
| 3 | <i>Makhsudova Maksad</i> | <i>Teacher</i> | <i>Mujiharf</i> | <i>987 487 359</i> |
| 4 | Hakimov Soleh | Head of Chepak village | Mujiharf | 918 85 54 18 |
| 5 | Ghaniev Davlatsho | Chepak village resident | Mujiharf | 900 09 73 57 |

Grievance Redress Committee, Mujiharfi Kalon Village, Nurobod District

| No | Name | Position | Address | Telephone |
|----|--------------------------------|--------------------------------|------------------------|----------------------------|
| 1 | Roziev Zinatullo | Head of jamoat | Mujiharf | 985 51 52 57 |
| 2 | Abdulhaev Izomiddin | Sarhatib | Mujiharf | 918 84 54 13 |
| 3 | Habibov Rahmonali | Teacher | Mujiharf | 918 55 75 15 |
| 4 | Saiumarov Manzar | Head of village | Mujiharf | 901 40 70 13 |
| 5 | <i>Yunosova Sadbarg</i> | <i>Village resident</i> | <i>Mujiharf</i> | <i>981 07 37 05</i> |

Grievance Redress Committee, Degavillage, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------------|---|----------------------------|----------------------------|
| 1 | Jalilov Mahmadsidik | Head of jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Zaidov Samariddin | Jamoat land surveyor | Komsomolodod | 918 23 64 14 |
| 4 | Jobirov Dodarjon | Head of Degai village | Komsomolodod | 934 88 89 83 |
| 5 | <i>Imonova Sumbul</i> | <i>Resident of Degai village</i> | <i>Komsomolodod</i> | <i>985 27 36 35</i> |

Grievance Redress Committee, Tutkhor Village, Mujiharf Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|--------------------------------------|---|----------------------------|----------------------------|
| 1 | Jalilov Mahmadsidik | Head of jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | Teshaev Asadullo | Resident of Tutkhor village | Komsomolodod | 987 14 57 83 |
| 4 | Masudov Saimahmud | Head of Tutkhor village | Komsomolodod | 918 81 98 29 |
| 5 | <i>Kalandarova Mehrinigor</i> | <i>Resident of Tutkhor village</i> | <i>Komsomolodod</i> | <i>987 96 56 57</i> |

Grievance Redress Committee, Tegermi Village, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------------|---|----------------------------|----------------------------|
| 1 | Jalilov Mahmadsidik | Head of jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhiddin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | <i>Kayumova Idimo</i> | <i>Resident of Tegermi village</i> | <i>Komsomolodod</i> | <i>981 05 07 08</i> |
| 4 | Ghayratov Kishvar | Head of Tegermi village | Komsomolodod | 918 61 35 66 |
| 5 | Burov Muhiddin | Resident of Tegermi village | Komsomolodod | 985 12 30 90 |

Grievance Redress Committee, Pandovchi Village, Kamsamolobod Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|--------------------------------|---|----------------------------|----------------------------|
| 1 | Jalilov Mahmasidik | Head of Jamoat | Komsomolodod | 987 14 62 69 |
| 2 | Abduloev Muhidin | Jamoat's secretary | Komsomolodod | 988 08 63 20 |
| 3 | <i>Kurbonova Mahina</i> | <i>Resident of Pavdonchi village</i> | <i>Komsomolodod</i> | <i>918 52 81 88</i> |
| 4 | Isroilov Nazrihuja | Head of Pavdonchi village | Komsomolodod | 918 09 85 32 |

| | | | | |
|---|--------------------|-------------------------------|--------------|--------------|
| 5 | Uzbekov Ilhomiddin | Resident of Pavdonchi village | Komsomolodod | 985 03 36 23 |
|---|--------------------|-------------------------------|--------------|--------------|

Grievance Redress Committee, Dehi Tag Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------|-------------------------------------|-----------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Dehi tag | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Dehi tag | 981 08 07 19 |
| 3 | Amonatov Karimbek | Head of Dehi tag village | Dehi tag | 918 18 72 62 |
| 4 | Yatimova Munira | Resident of Dehi tag village | Dehi tag | 918 38 79 54 |
| 5 | Eshonov Dodarjon | Resident of Dehi tag village | Dehi tag | 918 53 40 37 |

Grievance Redress Committee, Ulfatobob Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|---------------------------------------|------------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Ulfatobob | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Ulfatobob | 981 08 07 19 |
| 3 | Holmatova Sobira | Resident of Siyahgulak village | Ulfatobob | 918 38 57 50 |
| 4 | Mirzoev Sharifhoja | Head of Ulfatobod village | Ulfatobob | 918 90 80 44 |
| 5 | Mahmadov Khurshed | Resident of Ulfatobod village | Ulfatobob | 985 27 24 90 |

Grievance Redress Committee, Gulmon Village, Safedchashma Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|-------------------------|-----------------------------------|---------------|---------------------|
| 1 | Nosirova Malika | Head of Jamoat | Gulmon | 985 77 69 77 |
| 2 | Mahmadhojaev Kadamjon | Jamoat's land surveyor | Gulmon | 981 08 07 19 |
| 3 | Hasanova Nazokat | Resident of Gulmon village | Gulmon | 918 24 31 18 |
| 4 | Hasanov Shomahmad | Head of Gulmon village | Gulmon | 93 882 27 67 |
| 5 | Safiev Shamsiddin | Resident of Gulmon village | Gulmon | 918 55 91 84 |

Grievance Redress Committee, 7th Microrayon of Darband Jamoat, Nurobod District

| No | Name | Position | Address | Telephone |
|----|------------------------|-------------------------|---------------------|---------------------|
| 1 | Bobiev Kumuddin | Head of Jamoat | Darband city | 918 85 54 38 |
| 2 | Pudinaev Jamshed | Jamoat's secretary | Darband city | 985 31 13 51 |
| 3 | Loikov Dodarjon | Head of village | Darband city | 981 04 64 50 |
| 4 | Jomiev Sudur | Village resident | Darband city | 985 32 13 72 |
| 5 | Hakimova Sojida | Village resident | Darband city | 988 66 20 47 |

Complaints can also be made directly via the Contractors Grievance Mechanism and/or via the EBRDs Project Complaint Mechanism (PCM)/ Independent Project Accountability Mechanism (IPAM) using the links provided below:

Contractor: << to be confirmed once known >>

EBRD: <https://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/submit-a-complaint.html>

All complaints should be acknowledged and a response received (provided the complaint was not made anonymously). Full details of the grievance process can be found in the Stakeholder Engagement Plan, hard copies of this plan and other documents can be found at the local Jamoat offices in each village.

Stakeholder consultation:

<<Would suggest we insert details of upcoming/future stakeholder engagement once agreed – including dates>>

Job Opportunities:

<<Potential job opportunities could be added>>

<<Suggest to do this as an A5 folded booklet and that the brochure is prepared to be user friendly>>