

Indigenous Peoples Planning Framework

Project Number: 56189-001
October 2022
Document stage: Final

Philippines: Tiger Digital Infrastructure for Rural Connectivity Project

Prepared by Tiger as a requirement of the Asian Development Bank.

CURRENCY EQUIVALENTS
(as of 19 October 2022)

Currency unit	–	Philippine Peso (PHP)
PHP1.00	=	\$ 0.017
\$1.00	=	PHP 58.84

NOTES

- (i) The fiscal year (FY) of Tiger Infrastructure Philippines Inc. ends on 31 December.
- (ii) In this report, "\$" refers to United States dollars.

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Indigenous Peoples Planning Framework

PHI: Tiger Digital Infrastructure for Rural Connectivity Project

Revision no: 0

Tiger Infrastructure Philippines, Inc.

TIPI Telecommunications Towers Project
21 October 2022

Executive summary

Tiger Infrastructure Philippines, Inc. (TIPI or the Proponent) aims to develop and construct [INFORMATION REDACTED]¹ steel telecommunications towers within Visayas and Mindanao in the Philippines. Currently, TIPI has confirmed [INFORMATION REDACTED] sites in Mindanao, while the location of the remaining [INFORMATION REDACTED] of the towers is still to be determined. All sites will be leased. TIPI is seeking project financing from Asian Development Bank (ADB or the Lender) to support the project financing requirements, TIPI commissioned a consultant to draft the Indigenous Peoples Planning Framework (IPPF) against ADB Safeguard Requirements. The IPPF provides information on the nature and extent of social impacts to the project-affected Indigenous Peoples (IP) from the proposed construction of TIPI telecommunications towers.

Based on the information provided and site visits, ADB has classified the Project in accordance with the SPS as follows:

- **Environment:** Category B, with potential environmental impacts likely to be site-specific, mostly reversible, and readily managed. An Initial Environmental Examination is required by ADB for Category B projects.
- **Involuntary Resettlement:** Category C, there will be no involuntary land acquisition or involuntary land restriction for the land leased by TIPI for the Project. In instances where landowners do not wish to lease their land or disagree with the lease terms being offered, there is a great deal of flexibility in the project design of TIPI to locate alternate site options. Safeguards Requirements 2: Involuntary Resettlement is therefore not triggered for the Project. However, a documented process will be in place to ensure that the land lease was done on a willing lessee basis.
- **Indigenous Peoples:** Category B, there are some towers that are located within Indigenous People's customary owned land and as such is classified as Category B. An Indigenous Peoples Plan (IPP) is required by ADB for Category B projects.

This report provides the IPP for the Project.

Potential Impacts

The Project is expected to primarily have positive impacts for the Indigenous Peoples from the creation of an opportunity for direct employment, increased income through provision of other services or supplies, and learning of new skills or on-the-job training for IPs and members of the community through the Social Development Plans to be implemented by TIPI.

The potential adverse impacts for the project are the loss of community cohesion, loss of site access and temporary change in land use, temporary increased noise levels during the construction phase, potential discrimination against women and vulnerable groups, risks to health and safety, and health risks due to prolonged exposure to EMFs for communities immediately adjacent to the Tower Sites.

Information Disclosure, Consultation, and Grievances

TIPI's approach to information disclosure, consultation, and participation is captured during the Site Acquisition (SAQ) process. The Project is currently at the pre-construction stage which includes securing tower locations and local permits. These requirements will ensure that meaningful community consultation will be undertaken, and a culture of informed consent and participation are carried out on an ongoing basis throughout the Project life.

In addition to the information disclosure, consultation, and participation with landowners, TIPI will adopt a culturally appropriate, sensitive, and participatory approach for the sites that have lessors that are part of Indigenous Peoples tribes. There is one (1) site located within a CADT ([INFORMATION REDACTED]) and another within a clan title ([INFORMATION REDACTED]). The Philippine Republic Act No. 8371 created the National Commission on Indigenous Peoples (NCIP) in 1997 to recognize, protect, and promote the rights of

¹ This information has been removed as it falls within the exceptions to disclosure as specified in para 17(v) of ADB's Access to Information Policy.

indigenous cultural communities (ICC)/indigenous peoples (IP). TIPI will undergo the FPIC Process, as laid out in NCIP AO No. 3, for the applicable sites. TIPI will also be guided by the ADB SPS, Access to Information Policy (2018), and Accountability Mechanism (2012). The indigenous people's development plan as appended to the NCIP-required MOA will be submitted to ADB for review and concurrence.

A formal Grievance Redress Mechanism will be established by TIPI to receive and facilitate resolution of the affected individual/groups complaints or concerns regarding the project's environmental performance. The process of addressing the grievances shall be done well-documented, proportional to the grievance, culturally sensitive and appropriate, reasonable, accessible, transparent, and resolved in a timely manner. All contractors will be required to implement the procedure and report grievances to TIPI.

For the IP Grievance Redress Procedures, conflicts within the affected IP community will be addressed within the community itself in the context of its customary law and customary dispute resolution process and mechanisms, in the presence of the relevant staff of the NCIP office with jurisdiction over the area, and if so invited, project-related staff and other stakeholders.

In addition to the project GRM, ADB's accountability mechanism (May 2012) also applies to the project. The accountability mechanism provides opportunities for people that are adversely affected by ADB-financed projects to express their grievances, seek solutions, and report alleged violations of ADB's operational policies and procedures, including safeguard policies.

Institutional and Implementation Arrangement

TIPI, a special purpose vehicle incorporated in the Philippines in December 2020, will be the primary responsible for the overall project coordination and management, including compliance with the safeguard requirements. TIPI will designate an Environment and Social (E&S) Safeguards staff to manage and monitor E&S concerns. The E&S staff will be responsible for overseeing site selection, and EPC implementation of ESMP and semi-annual safeguard reporting to ADB and other lenders. Project construction will rely mainly on the engineering-procurement-construction (EPC). Both the TIPI and EPC contractor staff of the EPC contractor will need to be oriented on the ESMS and IPPF requirements.

Monitoring, Reporting, and Evaluation

The project is subject to environment and social safeguards monitoring and reporting. The TIPI's E&S staff will serve as the Project's internal monitoring body with support from TIPI's SAQ team and EPC HSSE team which are the primary point of contact in the site selection/acquisition/negotiation process. Monitoring reports will be submitted to ADB for review and uploading on the ADB website. Monitoring and Evaluation is done to assist the Project in assessing the progress of the IPP as well as the adequacy and effectivity of the mitigation measures in addressing the social impacts resulting in the Project's implementation. The monitoring results will also be reviewed for continuous improvement of the environmental and social performance, as well as to be considered for unforeseen events and impacts. TIPI will prepare and submit social monitoring reports to ADB semi-annually. TIPI will undergo audits that will assess compliance the national laws and regulations, ADB SPS requirements, and internal policies and procedures as laid out in their ESMS.

Budget and Financing

The management and enhancement measures to address project-related impacts contained in this IPPF will be funded by TIPI from the Project capital expenditures, construction, and operations costs.

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Acronyms and abbreviations

AD	Ancestral Domain
ADB	Asian Development Bank
ADO	Ancestral Domain Office
AO	Administrative Order
ARMM	Autonomous Region in Muslim Mindanao
ARTA	Anti-Red Tape Authority
CA	Community Assembly
CAAP	Civil Aviation Authority of the Philippines
CADT	Certificate of Ancestral Domain Title
CALT	Certificate of Ancestral Land Title
CCA	Community Consultative Assembly
[INFORMATION REDACTED]	[INFORMATION REDACTED]
CEB	Commission En Banc
CDO	Community Development Officer
CNO	Certificate of Non-Overlap
COL	Contract of Lease
CSC	Community Service Center
CSO	Civil Society Organizations
CP	Certificate Precondition
[INFORMATION REDACTED]	[INFORMATION REDACTED]
DAR	Department of Agrarian Reform
DDD	Detailed Design Drawing
DENR	Department of Environment and Natural Resources
DLRE	Daily Life Renewable Energy
DITC	Department of Information and Communications
DOH	Department of Health
DPWH	Department of Public Works and Highways
E&S	Environmental and Social
EHS	Environment, Health, and Safety
EIS	Environmental Impact Statement
EMF	Electromagnetic Field
EPS	Engineering-Procurement-Construction

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ESCAR	Environmental and Social Compliance Audit Report
ESMS	Environmental and Social Management System
FBI	Field Based Investigation
FPIC	Free and Prior Informed Consent
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
ICC	Indigenous Cultural Communities
ICM	Investment Committee Meeting
ICT	Information and Communications Technology
IEE	Initial Environmental Examination
IFC	International Finance Corporation
ILO	International Labour Organization
IP	Indigenous Peoples
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
IPRA	Indigenous Peoples' Rights Act
IR	Involuntary Resettlement
JMC	Joint Memorandum Circular
LAO	Legal Affairs Office
LGU	Local Government Unit
MC	Memorandum Circular
MLA	Master Lease Agreement
MOA	Memorandum of Agreement
MOC	Memorandum of Conformity
NAMRIA	National Mapping and Resource Information Authority
NCIP	National Commission on Indigenous Peoples
NGO	Non-Government Office
NPCC	National Pollution Control Commission
NTC	National Telecommunications Commission
PAPs	Projects, Activities, Plans
PhilHealth	Philippine Health Insurance Corporation
RA	Republic Act
RoC	Resolution of Consent
RNC	Resolution of Non-Consent

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SAQ	Site Acquisition
SDP	Social Development Programs
SEP	Stakeholder Engagement Plan
SPS	Safeguard Policy Statement
SPTI	Shared Passive Telecommunications Tower Infrastructure
TIPI	Tiger Infrastructure Philippines, Inc.
TTI	Tiger Towers Investment Pte. Ltd
TSSR	Technical Site Survey Report
UN	United Nations
UN-DRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNESCO	United Nations Educational, Scientific and Cultural Organization
WASH	Safe Water, Sanitation, and Hygiene
WFP	Work and Financial Plan

1. Introduction

1.1 Project Background

Tiger Infrastructure Philippines, Inc. (TIPI or the Proponent) aims to develop and construct [INFORMATION REDACTED] steel telecommunications towers within Visayas and Mindanao in the Philippines (the "Project"). TIPI has signed a Build-to-Suit and co-location Master Lease Agreement (MLA) with [INFORMATION REDACTED] and is seeking MLAs with other mobile network operators in the country to co-locate their towers. Currently, TIPI has confirmed [INFORMATION REDACTED] sites in Mindanao, while the location of the remaining [INFORMATION REDACTED] of the towers is still to be determined. All sites will be leased.

TIPI is seeking project financing from Asian Development Bank (ADB or the Lender) to support the project financing requirements. TIPI commissioned a consultant to draft the Indigenous Peoples Planning Framework (IPPF) against ADB Safeguard Requirements.

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This report provides the IPP for the Project.

1.2 Purpose and Scope

The Indigenous Peoples Planning Framework (IPPF) is prepared to provide information on the nature and extent of social impacts to the project-affected Indigenous Peoples (IP) from the proposed construction of TIPI telecommunications towers. The IPPF aims to ensure project-affected IPs receive appropriate social and economic benefits, participate voluntarily in the project planning and execution, and are not adversely affected by the project. The IPPF aligns with ADB's definition of IPs (*Indigenous Peoples Safeguards Draft Working Document 2013*) defined as having the following traits:

- Self-identification as members of an IP group;
- Collective attachment to geographically distinct habitats or ancestral territories;
- Customary economic, social, political, cultural institutions distinct from the dominant society; and
- Distinct language often different from the national, dominant, or regional language.

In the context of this project, recognized IPs are those that belong to the following categories:

- IPs are clans or tribes with issued Certificate of Ancestral Land Title (CALT) or Certificate of Ancestral Domain Title (CADT) from the National Commission on Indigenous Peoples (NCIP) or with recognized land or domain claims; and
- Migrant IPs who belong to an IP group with distinct cultural, religious, and linguistic characteristics but no longer collectively owns a distinct land title or domain by means of private land acquisition in another location. These IPs, while not holding any claims or titles within the tower locations, are still recognized as indigenous peoples that would need to be engaged distinctly from non-IP stakeholders in recognition of their distinct socio-cultural practices and sensitivities.

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While not present for all tower locations, both categories are recognized for some lots thus requiring appropriate stakeholder engagement, social development programs, and mitigants for project-related impacts that may affect their way of life.

2. Policy, Legal, and Administrative Framework

2.1 Applicable Legislation, Standards and Guidelines

2.1.1 Laws Relevant to Land Acquisition and Compensation

2.1.1.1 Philippine Constitution of 1987

Section 5 of Article 12 of the Philippine Constitution states: "The State, subject to the provisions of this Constitution and national development policies and programs, shall protect the rights of indigenous cultural communities to their ancestral lands to ensure their economic, social, and cultural well-being. By an act of Congress, customary laws governing property rights or relations can be applied in determining the ownership and extent of ancestral domains.

2.1.1.2 Republic Act No. 8371 – Indigenous Peoples Rights Act of 1997

The Indigenous People's Rights Act of 1997 (IPRA) or Republic Act No. 8371 sets conditions, requirements, and safeguards for plans, programs and projects affecting IPs. The important provisions of IPRA are:

- i. Right to their ancestral domains. (Chapter III, Section 11);
- ii. Right to an informed and intelligent participation in the formulation and implementation of any project, government or private, that will impact upon their ancestral domains; (Chapter III, Section 7b);
- iii. Right to participate fully, if they so choose, at all levels of decision-making in matters which may affect their rights, lives and destinies through procedures determined by them; (Chapter IV, Section 16);
- iv. Right to receive just and fair compensation for any damages inflicted by or as a result of any project, government or private; (Chapter III, Section 7b);
- v. Right to stay in their territory and not be removed from that territory. If relocation is necessary as an exceptional measure, it can only take place with the free and prior informed consent of the IPs and indigenous cultural communities (ICC) concerned; (Chapter III, Section 7c);
- vi. Right to be secure in the lands to which they have been resettled; (Chapter III, Section 7d);
- vii. Right to determine and decide their own priorities for the lands they own, occupy, or use; (Chapter IV, Section 17); and
- viii. Right to maintain, protect, and have access to their religious and cultural sites; (Chapter IV, Section 33);

The National Commission on Indigenous Peoples (NCIP) has issued Administrative Orders (AO) that put into operation the provisions of IPRA. The most important AO for purposes of this IPPF is NCIP Administrative Order No. 3 or the Revised Guidelines on Free and Prior Informed Consent Guidelines and Related Processes of 2012.

NCIP Administrative Order (AO) 3 of 2012 provides guidelines for the application for issuance of certification precondition, conduct of field-based investigation (FBI), issuance of certificate of non-overlap and procedures for ascertaining free and prior informed consent (FPIC) and documentation of agreements reached between project proponents and the IP communities.

2.1.2 Relevant International Conventions and Treaties

Provided details in **Table 2-1** are the international conventions and treaties which may be relevant to the project in with regards to Indigenous People.

Table 2-1. Relevant International Conventions and Treaties

International Conventions and Policies	Description
International Labour Organization Convention No. 107 Indigenous and Tribal Populations Convention (1957)	An international convention adopted to protect indigenous populations from oppression and discrimination among member states. It was the first international instrument to specifically address the indigenous people's human rights.
International Labour Organization Convention No. 169 on Indigenous and Tribal Peoples (1989)	The ILO Convention No. 107 was renamed as Indigenous and Tribal People's Convention No. 169 (1989). This convention recognizes the Indigenous Peoples' right to self-determination within a nation-state, also establishing standards for national government in terms of Indigenous Peoples' economic, socio-cultural, and political rights, including the right to a land base. This convention is grounded on the recognition of indigenous peoples' aspirations to exercise control over their own institutions, ways of life and economic development and to maintain and develop their identities, languages, and religions, within the framework of the States in which they live.
International Convention on the Elimination of all Forms of Racial Discrimination (United Nations, 1965)	This international convention is the foundation of the international regime that provides e protection and enforcement of the right against racial discrimination in all sectors of private and public life.
United Nations Declaration on the Rights of Indigenous Peoples (UN-DRIP) (2007)	This declaration established a universal framework of minimum standards for the survival, dignity, and well-being of the indigenous peoples of the world and it expands on existing human rights standards and fundamental freedom to indigenous people.
United Nations Convention Concerning the Protection of the World Cultural and Natural Heritage (the World Heritage Convention) (1972)	This convention stipulated the national protection and international protection of the cultural and natural. It also ensures the identification, conservation, and transmission to future generations of the cultural and natural heritage such as monuments, groups of buildings and sites.
Convention for the Safeguarding of Intangible Cultural Heritage (2003)	The Convention for the safeguarding of the Intangible Cultural Heritage is a UNESCO treaty adopted by the UNSECO General Conference on 17 October 2003. Intangible Cultural Heritage refers to the practices, representations, expressions, knowledge, and know-how are passed down from generation to next. This convention by UNSECO works to safeguard cultural heritage and promote cultural diversity as a force for dialogue and development.
Convention on the Protection and Promotion of the Diversity of Cultural Expressions (2005)	This convention recognizes the dual nature both cultural and economic of contemporary cultural expressions produced by artists and cultural professionals. It also supports in creating, producing, distributing, and accessing the cultural goods and services.

2.2 International Finance Institution Requirements

2.2.1 Asian Development Bank (ADB)

2.2.1.1 Safeguard Policy Statement

Safeguard Requirements 3 of the ADB Safeguard Policy Statement (2019) outlines the requirements that borrowers/clients are required to meet in delivering Indigenous Peoples Safeguards to projects supported by ADB. The main objective is to design and implement projects in a way that fosters full respect for IP identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the IPs themselves so that they: (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them. IP safeguards are triggered if a project directly or indirectly affects the dignity, human rights, livelihood systems, or culture of IPs or affects the territories or natural or cultural resources that IPs own, use, occupy, or claim as an ancestral domain or asset.

ADB's SPS for indigenous peoples requirements are anchored upon the following safeguards policy principles for indigenous peoples:

- (i) Screen early on to determine (i) whether Indigenous Peoples are present in, or have collective attachment to, the project area; and (ii) whether project impacts on Indigenous Peoples are likely.
- (ii) Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Give full consideration to options the affected Indigenous Peoples prefer in relation to the provision of project benefits and the design of mitigation measures. Identify social and economic benefits for affected Indigenous Peoples that are culturally appropriate and gender and inter-generationally inclusive and develop measures to avoid, minimize, and/or mitigate adverse impacts on Indigenous Peoples.
- (iii) Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation (i) in designing, implementing, and monitoring measures to avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate, or compensate for such effects; and (ii) in tailoring project benefits for affected Indigenous Peoples communities in a culturally appropriate manner. To enhance Indigenous Peoples' active participation, projects affecting them will provide for culturally appropriate and gender inclusive capacity development. Establish a culturally appropriate and gender inclusive grievance mechanism to receive and facilitate resolution of the Indigenous Peoples' concerns.
- (iv) Ascertain the consent of affected Indigenous Peoples communities to the following project activities: (i) commercial development of the cultural resources and knowledge of Indigenous Peoples; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of Indigenous Peoples. For the purposes of policy application, the consent of affected Indigenous Peoples communities refers to a collective expression by the affected Indigenous Peoples communities, through individuals and/or their recognized representatives, of broad community support for such project activities. Broad community support may exist even if some individuals or groups object to the project activities.
- (v) Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous Peoples communities participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared.

- (vi) Prepare an Indigenous Peoples Plan (IPP) that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected Indigenous Peoples communities. The IPP includes a framework for continued consultation with the affected Indigenous Peoples communities during project implementation; specifies measures to ensure that Indigenous Peoples receive culturally appropriate benefits; identifies measures to avoid, minimize, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures, monitoring and evaluation arrangements, and a budget and time-bound actions for implementing the planned measures.
- (vii) Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected Indigenous Peoples communities and other stakeholders.
- (viii) Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples have traditionally owned or customarily used or occupied, or (ii) involuntary acquisition of such lands.
- (ix) Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective and desired outcome have been achieved, taking into account the baseline conditions and the results of IPP monitoring. Disclose monitoring reports.

There is no material gap or difference between the requirements under ADB SPS and national regulations related to IPs. From the definition of IPs, requirement for meaningful consultation with affected IPs, and requirement for ascertaining free and prior informed consent or broad community support are aligned in most respects, with IPRA providing more specific guidelines and requirements through the various AOs issued by the NCIP. The challenge remains mainly with the implementation of the regulations, and conflicting tenurial instruments related to land. There is also a need to simplify certain processes and develop of a more differentiated approach for different types of interventions so as not to further cause exclusion of IP communities in development.

2.2.1.2 Other Policies

The ADB policy on gender and development adopts gender mainstreaming as a key strategy for promoting gender equity, and for ensuring participation of women and that their needs are explicitly addressed in the decision-making process for development activities. Other policies of the ADB that have bearing on IP planning and implementation are the Access to Information Policy (2018) and Accountability Mechanism (2012).

3. Description of Indigenous Peoples

The NCIP estimates the indigenous population of the country at 11.3 million which is between 11-12% of the population. Some CSOs estimate the IP population to be 10% and 20% of the national population. Indigenous groups of Mindanao are collectively called Lumad that include the Manobo, the bigger ethnographic group covering most of mainland Mindanao. Other Muslim ethnic groups abound like the Maguindanaoan, Maranao, Tausug, Yakan, and Sama Banguingui. In the Panay Island, there are the Ati and Tumandok tribes. Currently, there are more than 90 ancestral domain claims in the Visayas and Mindanao regions with a total area of approximately 673,000 hectares.

Dominant IPs within Project Areas

Lumad of Mindanao¹. Lumad is a Bisayan term meaning “native” or “indigenous” and was adopted by 15 ethnic groups during the Cotabato Congress in June 1986 to distinguish them from the other Mindanaos, Moro/Muslim or Christian. At present, Mindanao Lumads account for 2.1 million out of the total 6.5 million indigenous people nationally. (1993 Census) these fifteen Lumads in the Cotabato Congress were the following: Subanen, B’laan, Mandaya, Higaonon, Banwaon, Talaandig, Ubo, Manobo, T’boli, Tiruray, Bagobo, Tagakaolo, Dibabawon, Manguangan, and Mansaka. Lumads practice swidden agriculture. Communal sharing of resources based on the belief of the sacredness of land and nature as divine endowments define their relationship with their environment. Socio-political arrangements are varied such as the case of the Mandaya, led by their bagani or warrior, the Bagobos with their Manuvu, and most of the Lumads by their datu. The Datu’s subjects are his sacops. The Lumad generally remain isolated and withdrawn from the hills and forest.

Maguindanaoan². The Maguindanaon inhabit North Cotabato, South Cotabato, Sultan Kudurat, Zamboanga del Sur, and Maguindanao; the latter having the largest concentration. Maguindanaon means “people of the flood plain” as they primarily inhabit the broad Pulangi River valley and delta. The Pulangi River had its origins in the mountains from the Liguasan Marsh and Lake Buluan. They observe Islam as reflected in their way of life and social structure. Their socio-political system and hierarchical organization are related to the Sulu sultanate, which trace their ancestry to Sharif Kabunsuan who was one of the first Muslim missionaries and Sultan Kudarat. The *paluwaran* code includes provisions on every aspect of life. The Maguindanaoan are known for their handwoven fabric, *Inaul*, whereby the colors of the fabric and depicted symbolic-motifs reflect the splendor of Muslim culture. Their primary means of livelihood is agriculture and grow corn and rice.

Illanun. The Illanun, also called Iranun and Ilianon, are closely related both culturally and linguistically to the Maranao and Maguindanaon. The majority of Illanun live along the coastline in the towns of Nulingi, Parang, Matanog, and Barira in Maguindanao Province; along the Iliana Bay coast, north of the mouth of the Pulangi River; and all the way to Sibugay Bay in Zamboanga del Sur and even the western coastal plain of Borneo.

Maranao. The Maranao inhabit Lanao del Norte and Lanao del Sur in Mindanao. The name Maranao means “People of the Lake”, after their traditional territory in the area surrounding Lake Lanao in the Bukidnon-Lanao Plateau. They are one of the largest Islamic groups in the Philippines, with the core areas being Marawi City, Lumba-a-bayabao, and Bayang. The Maranao are a splinter group of the Maguindanao who took up Islam. Communities are clustered around a mosque and a *torogan*, a royal house belonging to the preeminent economic household in the area. Aside from exotic textiles, metalwork, and woodcraft, the *torogan* structure is the most significant and spectacular example of Filipino secular architecture. The Maranao are widely distributed and contribute significantly to the market and trade industry. The *awang* (dugout boat) used principally in Lake Lanao is both unique and extremely ornate. Textiles, on the other hand, symbolize the socio-economic rank of the wearer through the intricacies of the design motifs woven into the fabric, as well as, the richness of the colors used.

Maranao villages are composed of several families living in homes sans walls for partition. They are allowed to be members of different villages simultaneously, without fear of recrimination as outcasts due largely in part

to accepted bilateral relations. Primary subsistence consists of dry rice cultivation in hilly areas; intensive wet rice in flood plains; and some corn, sweet potato, coffee, cassava and peanuts.

Tausug. The Tausug is the dominant ethnic group in the Sulu archipelago specifically occupying Jolo, Indanan, Siasi, and Patikul in Sulu (ARMM). There are also scattered settlements in Zamboanga del Sur and Cotabato, and all the way to Malaysia, which has an estimated Tausug population of more than 110,000. Tausug is a combination of *tau* (person) and *suug* (the old name of Jolo Island). The present generation of Tausugs are believed to be descended from the different ethnic groups that had migrated to the Sulu archipelago. The Tausug language is adopted from the vocabulary of *Tagimaha*, in whose locality the Sultan of Sulu lived and established Buansa, the capital of the Sultunate. They have two dialects: *parianum* and *gimbahanun*. *Parianum* is spoken by the people living along the coasts of Jolo and *gimbahanun*, by those living in the interior part.

Yakan. The Yakans are concentrated in Tipo-tipo, Lamitan, Sumisip, and Tuburan in the Basilan Island of ARMM. There are also scattered populations on the islands of Sakol, Malanipa, and Tumulutad east of the Zamboanga Peninsula. The word Yakan means "Dayak Origin," as they are believed to be descendants of the *Orang Dayak* or *Tagihama* of eastern Indonesia. They speak a dialect of Sama language and are culturally influenced in some respect by the Tausug. The Yakans' chief means of livelihood is farming - upland rice. They do not normally live in compact villages, building their houses just out of sight of their nearest neighbors. The prominent person is the *imam*, who combines both religious and sociopolitical leadership.

Sama Banguingui. The Sama Banguingui is a distinct ethno-linguistic group dispersed throughout the Greater Sulu Archipelago and southern and western coastal regions of the Zamboanga Peninsula; usually collectively known as the Sama-Bajau peoples. Settlements are of densely clustered houses situated along well-protected stretches of shoreline. In some places, houses are built directly over the sea, but in other places are located along the beach front. Houses usually have one rectangular room with an attached kitchen. Households are grouped into larger units called *tumpuk* (clusters), located near one another and are related by close kinship ties. Within the village, the household head is acknowledged as the *tumpuk* spokesman. In some instances, the *tumpuk* coincides with the parish, whose members belong to a single mosque. Oral traditions are handed down by the *kamattoahan* (elders) to the *kaanakan* or *anak baha-u* (new generations). The Banguingui build and manage formidable *kuta* (forts) throughout the Sulu Archipelago as well as *vinta* or *bangka-bangka* boats that roam the Sulu-Sulawesi region.

The identification of IPs and sites with IP claims will be undertaken in close coordination with the respective provincial office of the National Commission on Indigenous Peoples (NCIP) to ensure compliance with the requirements.

4. Potential Impacts on Indigenous Peoples and Management Measures

4.1 Screening and Social Impact Assessment

For the initial [INFORMATION REDACTED] tower sites, the screening and assessment of impacts for IPs were based on findings during the conducted social compliance audit for the proposed tower sites and secondary data. Secondary information reviewed included TIPI-provided documents, digital maps from the National Mapping and Resource Information Authority (NAMRIA), and online maps and data from relevant government agencies such as the NCIP, Department of Environment and Natural Resources (DENR), and Department of Agrarian Reform (DAR). Data and maps obtained from these agencies were further processed using ArcGIS to render project-specific maps. Proponent-provided documents included the Site List Presentation and permitting documents attached for each lease agreement/tower location. In detail, the permitting documents included the Technical Site Survey Report (TSSR), land survey, tax receipts or declarations, and other documents supporting lessors' authority over the land.

Site ocular of the proposed tower sites, interviews with the lessors, review of the lease agreements and supporting documents, desktop assessment of land classification, and constraints analysis of potential overlaps with ancestral land or domain titles or claims were conducted. During the site visit, photo-documentation of present land use and geotagging of access and existing structures were conducted. Following the site ocular, interviews with the lessors, neighboring lots, and the barangay council (as available) were conducted. Interviews with the lessors were conducted with a set questionnaire following key information required by the socio-economic, public health, and perception survey form (Annex A). The summary of key questions discussed include the following:

- Ethnicity and Cultural Identity;
- Settlement History or Migration;
- Organization or Sectoral Group;
- Type of lot/land ownership including tenurial instruments held;
- Livelihood;
- Health and Nutrition
- Community Awareness including identified Issues and Concerns;
- Climate Change and Disaster Risk Awareness; and
- Self-Assessment on the Quality of Life.

For the remaining [INFORMATION REDACTED] towers that are still to be identified and confirmed, an early review of the potential location using available maps and records will be undertaken to allow for early planning and coordination with the relevant agencies, including the NCIP.

4.2 Potential Impacts and Opportunities

The potential impacts and opportunities identified for the various project phases according to the environmental and social review, site visit, and review of policies and guidance documents discussing associated risks and opportunities for telecommunications projects are presented in **Table 4-1**. During project execution, the actual magnitude of impacts may be reduced with prior social impact assessment and application of mitigation discussed in the succeeding sections.

Table 4-1. Summary of Potential Impacts and Opportunities

Project Phase	Project Activity	Potential Impact or Opportunity	Description
Pre-Construction	Site Selection and Technical Site Survey	Impact	Loss of community cohesion through: <ul style="list-style-type: none"> • Lack of appropriate consultations with landowner and the community who may have a collective authority over the land (ancestral land/domain title or claim). • Potential discrimination against women and vulnerable groups during the consultation process
	Lease Negotiations	Impact	Loss of community cohesion due to inadequate consultations and cost valuation study for the appropriate compensation for lease of the land
		Opportunity	Opportunity to improve the quality of life and craft appropriate social development programs with the understanding of the needs of the local community and provision of adequate land/asset valuation
	Site Access and Change in Land Use	Impact	Loss of site access and change in land use due to technical site survey, demarcation of disturbance area and buffer, and clearing of vegetation and existing structures.
Construction	Project procurement and employment	Impact	Potential discrimination against women and vulnerable groups during procurement of services and employment
		Opportunity	Opportunity for direct employment, increased income through provision of other services or supplies, and learning of new skills or on-the-job training for IPs and members of the community
	Arrival of project workforce	Impact	Risks to IP health and safety through:

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Project Phase	Project Activity	Potential Impact or Opportunity	Description
			<ul style="list-style-type: none"> Exposure to/increased risk to communicable diseases such as COVID-19 Increased risks to accidents and exposure to emissions with the arrival of vehicles and heavy equipment <p>Loss of community cohesion and intangible cultural heritage due to influx of workers from outside the community bringing with them socio-cultural practices that are in conflict or foreign to the culture and sensitivities of the IPs</p>
	Ground preparation and excavation	Impact	<p>Safety risks to landowner and neighboring lots due to potential soil and ground stability loss.</p> <p>Loss or damage to archaeological or cultural heritage values</p>
	Construction of towers and supporting infrastructure	Impact	Temporary inconvenience due to increased noise levels and emissions during construction
	Waste Generation	Impact	Health and safety risks through exposure to domestic wastes, used oil and lubricants, silica from concrete, and emissions from generator set, vehicles and heavy equipment
	Site Security	Impact	Potential local conflicts and security risks from criminal elements which may affect access during the construction and may impact the towers during the operations.
Operation	Network operations	Opportunity	Increased access to telecommunications services that will, in turn, improve access to education, livelihood, health, and basic services that are dependent on communications and digital technology
		Opportunity	Increased livelihood opportunities and access to

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Project Phase	Project Activity	Potential Impact or Opportunity	Description
			<p>utilities with business establishments, local community centers, and basic services potentially constructing markets and facilities near the tower sites</p>
		Impact	<p>Health risks due to prolonged exposure to electromagnetic fields (EMF). According to the IFC EHS Guidelines for Telecommunications (2007), there is no empirical data demonstrating adverse health effects from exposure to typical EMF levels from power transmission lines and equipment.</p>

5. Information Disclosure, Consultation, and Participation

5.1 Engagement with Landowners

TIPI's approach to information disclosure, consultation, and participation is captured during the Site Acquisition (SAQ) process (Annex A). The Project is currently at the pre-construction stage which includes securing tower locations and local permits. Although the Stakeholder Engagement Plan (SEP) has not been officially documented to date, the Site Acquisition (SAQ) team is comprised of local contractors who are currently responsible for activities that involve stakeholder engagements such as surveying potential sites, coordinating with lessors and securing local permits. The SAQ members report back their findings to TIPI's SAQ coordinator. TIPI's SAQ coordinator engages with stakeholders when decisions on-site must be made, and during inspections prior to construction.

The SAQ procedures also require that the following will be acquired:

- Barangay Clearance/Resolution
- Neighbor consent/ HOA, optional
- Zoning Clearance/Lot reclassification

These requirements will ensure that meaningful community consultation will be undertaken, and a culture of informed consent and participation are carried out on an ongoing basis throughout the Project life (pre-construction, construction, and operations). These consultations to acquire the permits will be done by voluntary basis and without external interference or coercion.

5.2 Engagement with Customary Landowners

Of the [INFORMATION REDACTED] initially identified sites, there are [INFORMATION REDACTED] with lessors that are part of Indigenous Peoples tribes/clans. [INFORMATION REDACTED] of these lessors are part of migrant IP tribe (Manobo Tribe) in [INFORMATION REDACTED]. Based on the constraints analysis performed as part of the Project's Environmental and Social Compliance Audit Report (ESCAR), site [INFORMATION REDACTED] is located within a Certificate of Ancestral Domain Title. Through the site visit activity and an interview with the lessor, [INFORMATION REDACTED] was also identified as being within a clan title. An online article also stated that a Certificate of Ancestral Land Title was awarded to the Bl'aan tribe in Barangay Sinawal, General Santos City (Cabato, 2022), however the site is located within [INFORMATION REDACTED].

In addition to the information disclosure, consultation, and participation with landowners, TIPI will adopt a culturally appropriate, sensitive, and participatory approach for the sites that have lessors that are part of Indigenous Peoples tribes. A culturally appropriate approach will also be utilized when communicating and engaging the lessors that are members of the migrant Manobo tribe ([INFORMATION REDACTED]). Although the lessors that are part of the Manobo tribe have titled lands and are not within either a CADT, CALT, or clan title, the approach in dealing or engaging with these lessors will be tailor fit to respect the culture and lifestyle of the Manobo tribe.

There is one (1) site located within a CADT ([INFORMATION REDACTED]) and another within a clan title ([INFORMATION REDACTED]). The Philippine Republic Act No. 8371 created the National Commission on Indigenous Peoples (NCIP) in 1997 to recognize, protect, and promote the rights of indigenous cultural communities (ICC)/indigenous peoples (IP). Under the NCIP Administrative Order (AO) No. 3, the revised guidelines on Free and Prior Informed Consent (FPIC) process were laid out to ensure the genuine exercise by ICCs/IPs of their right to FPIC and in the introduction and implementation of plans, programs, projects, activities, and other undertakings that will affect them, among others. TIPI will undergo the FPIC process for the sites, as required.

All ICCs/IPs that own the concerned ancestral domains have the right to exercise FPIC on/for any of the activities listed in the NCIP AO No. 3 Section 19. A flowchart of the FPIC Process, including preliminary activities, activities, plans, programs, projects covered and mandatory activities, post-FPIC activities, and the memorandum of agreement, is presented below. This process will also determine whether the Project is within an Ancestral Domain (AD) and the ICCs/IPs who hold the rights to the AD. If the Project is determined to be located outside of an AD, NCIP shall issue a Certificate of Non-Overlap.

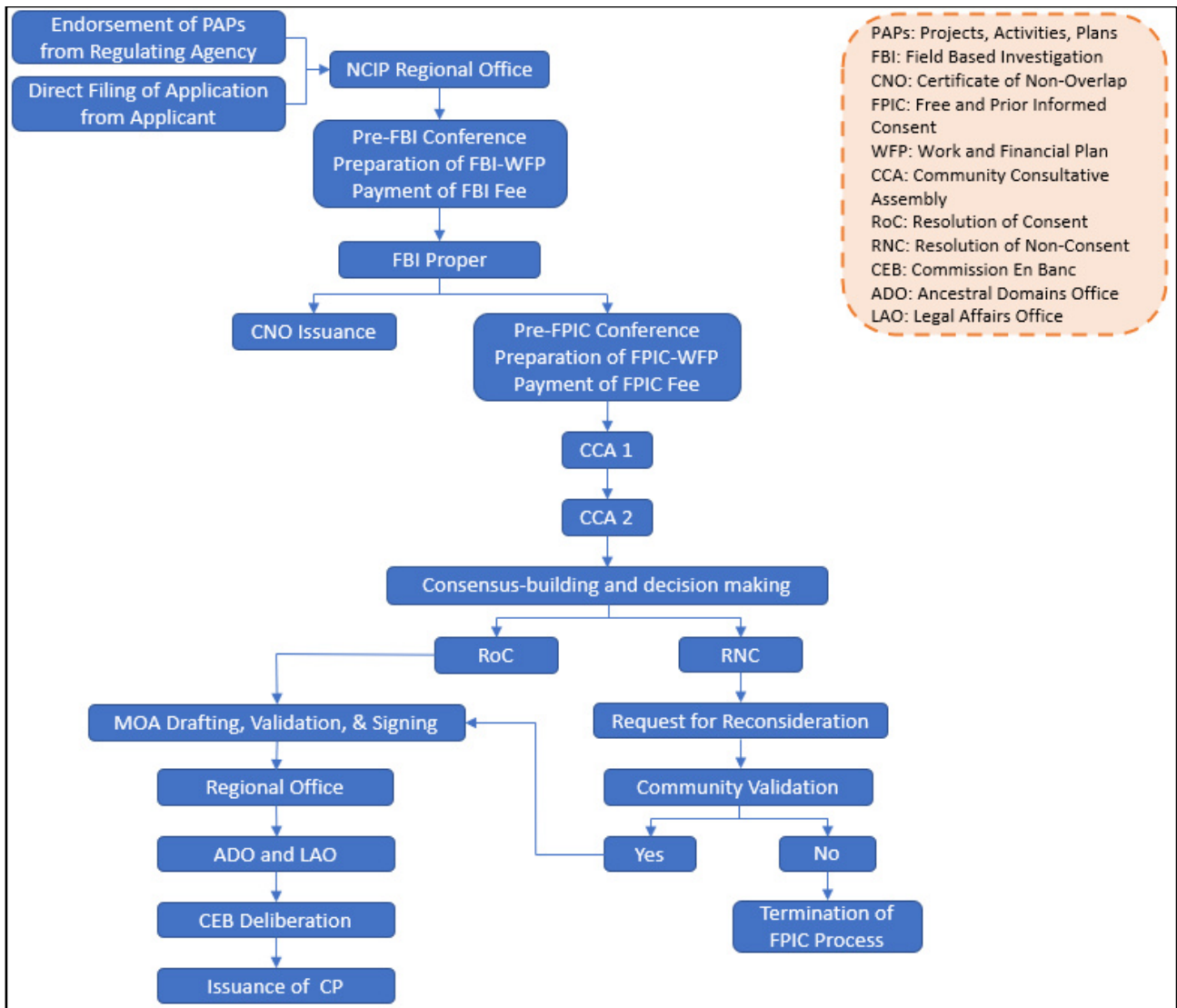


Figure 1. FPIC Process Flowchart, based on NCIP AO No.3, Series of 2012.

The process begins through the submission of the application for Certification Precondition (CP) to the NCIP Regional Office. The application can either be submitted through an endorsement by the appropriate regulatory agency or unit of government or through a direct application with the same NCIP Regional Office. Once the application is submitted, the ADO, in consultation with field offices, shall draft the standard and appropriate checklist. At any time, the FBI/FPIC team may require additional documents from the applicant (e.g. EIS from the DENR, if applicable). The documents required to be submitted along with the application are the following:

- a. Company and project profile, including the nature and purpose of the project;
- b. Location with an indicative map showing the names of sitios and/or barangays that will be affected;
- c. Abstract of the proposed project describing the size, pace, reversibility and scope;
- d. Duration;
- e. Preliminary assessment of the likely economic, social, cultural, and environmental effects, including potential risks and mitigating measures;
- f. Indicative budget;
- g. Persons to be involved in the project implementation;

- h. Operational Plan and activities; and
- i. The Profile of the Applicant

Once the application and the required attachments have been submitted, the Regional Director of the NCIP shall establish the FBI Team through a memorandum. The composition of the team may be revised based on the agreement of the FBI Team, as needed, with approval of the Regional Director. An FBI Team is composed of the following:

- The Community Development Officer (CDO), as the Team Leader;
- The FBI Provincial Focal Person;
- One (1) from the Community Service Center (CSC); and
- Two (2) IP Elders/Leaders identified by the CSC

The Pre-FBI Conference will then be conducted, discussing the requirements of the FBI process, identity and other basic information of the applicant, detailed project profile, Work and Financial Plan (WFP), and other important matters that may need to be agreed upon. The WFP shall be agreed upon by the applicant, the concerned ICCs/IPs representatives, and the NCIP during this conference.

The FBI Team will commence the FBI within ten (10) days from the date of deposit/payment of the FBI fee.

5.2.1 Disclosure, FPIC Process, and Consultations

In project locations near areas with IP communities, the IPPF will be disclosed to IPs at the NCIP Community Service Center and directly to the IPs in meetings during the site selection process. Basic information will be translated into the local language. A project information brochure (PIB) will be distributed to IP representatives indicating general contents which shall include the following items: (i) project profile, (ii) project activities and potential impacts, (iii) indicative lease arrangements, (iv) grievance redress mechanism, (v) timing of payments and schedule. The PIBs will be disclosed and be made available to all the barangays where IP households can have access to examine its contents.

TIPI will be guided by the ADB Access to Information Policy (2018) and Accountability Mechanism (2012) and submit the following documents to ADB for disclosure on ADB's website:

- i. An indigenous peoples' planning framework (IPPF) before ADB investment committee meeting (ICM);
- ii. The social compliance audit report;
- iii. A new or updated social safeguard planning document and a corrective action plan prepared during project implementation, if any; and
- iv. Monitoring reports during project implementation.

The ADB SPS stipulates that broad community support is required for the following:

- i. Commercial development of their cultural resources and knowledge of indigenous people;
- ii. Physical relocation from their traditional or customary lands;
- iii. Commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define their identity and community of indigenous people.

Broad community support is deemed by ADB to exist if the following conditions are met 19: (i) The majority of recognized representatives of the affected IP communities formally express their support; (ii) A considerable majority of affected IP communities' members, and particularly those most severely affected, provides their support either through formal agreements or other informal means; and (iii) Any significant opposition or major disagreement has been resolved through a good faith negotiation process. The project shall seek the consent of affected communities. Consent under IPRA will be through the Certificate Precondition/FPIC process.

Towers located within CADT/CALT and areas where IPs have collective attachments will be covered by broad community support. The procedures for securing broad community support shall be guided by NCIP Administrative Order (AO) No. 3, series of 2012. To the extent feasible, efforts will be made to combine or integrate the procedures for all sites situated in one CADT area.

All facets of the development cycle from planning, implementation, monitoring, and evaluation will ensure that consultation and IP engagement is free from coercion or manipulation. Gender and intergenerational inclusion will be observed and conducted with proper disclosure of information and in a manner appropriate to the social and cultural values of the affected IP communities and their condition. Hence, development project implementers apply for the Certificate Precondition (CP). Where there are IPs and ancestral domain claims, a prerequisite is to secure the FPIC before a CP is issued.

Mandatory FPIC activities starts with proponents required to post notices for the IP stakeholders at large and issuance of invitations by NCIP to the concerned Council of Elder/Leaders to attend the first of two Community Assemblies (CA). The 1st CA provides the avenue for the following salient matters to be discussed and/or acted upon: (i) Orientation on IPRA and the FPIC process; (ii) Validation of the FBI report and the area/s affected; (iii) The Census of IPs/Migrant IPs/Non-IPs; (iv) Identification and validation of IP Elders and Leaders; (v) Determination of the Decision-making or consensus-building process; (vi) Consensus on the involvement of NGOs/CSOs; (vii) Validation of the members of the FPIC Team representing the community; and (viii) Arrangements for conflict/dispute resolution mechanisms by the chosen/elected IP Elders/Leaders.

The 2nd CA shall undertake the following key activities: (i) Presentation by the applicant of the plan, program, project or activity that it seeks to undertake. The presentation shall include: a) The Operation Plan and the scope and extent of the proposal; b) The cost and benefits of the proposal to the ICC/IP and their ancestral domains; c) The perceived disadvantages or adverse effects to the community; and d) The measures adopted by the applicant to avoid or mitigate these; (ii) Sharing by an expert/s, if engaged or invited, to include presentation of the result of the IEE if available, expert opinion/s on any aspect, recommendations, and identification of affected area/s; (iii) Remarks or inputs of other stakeholders, e.g. concerned NGAs, LGUs, NGO, IPO; and (iv) Open forum to give the ICCs/IPs the chance to ask questions and to speak out their concerns relative to the presentations and the project. Towards the end of the 2nd CA, the ICCs/IPs are left alone to observe their consensus-building mechanisms.

When the ICCs/IPs are prepared with their decision or consensus, the duly authorized Community Elders/Leaders shall communicate to the FPIC Team such consensus. If it appears to be favorable, the FPIC Team shall immediately notify DPWH and the community representatives for the negotiation of the terms and conditions that shall be embodied in the MOA. Once the parties agree on the terms and conditions, the MOA is drafted in the vernacular and English. Thereafter, a validation assembly shall be convened within the AD, at which time the MOA provisions shall be explained to the community by the FPIC Team in a language that they speak and understand. If the consensus is not favorable, the Resolution of Non-consent is issued and a request for reconsideration may be applied. A validation assembly is similar to a consensus- building activity is conducted to validate the rejection.

When the consent of the concerned community is obtained, the terms and conditions agreed upon shall be embodied in a MOA to be executed between and among the ICC/IPs, TIPI, the NCIP, and any other party that may be necessarily involved. Key elements of the MOA include:

- i. Detailed benefit-sharing provisions;
- ii. Mitigation and resettlement plans for potential risks;
- iii. Redress mechanisms;
- iv. List of responsibilities of the company and the affected community;
- v. Inclusive dates/duration of agreement;
- vi. Benefits to be derived by the host ICC/IPs indicating the type of benefits, specific target beneficiaries as to sector and number, the period covered, and other pertinent information;
- vii. Detailed use of all funds to be received by the host ICC/IP communities;
- viii. Transparency mechanism on transfer and disbursement of funds;
- ix. Detailed measures to protect IP rights and value systems;
- x. Detailed measures to conserve/protect any affected portion of the ancestral domain critical for watersheds, mangroves, wildlife sanctuaries, forest cover, and the like;
- xi. Responsibilities of the applicant as well as the host IP community;
- xii. The monitoring and evaluation system of the MOA, to include submission of reports and creation of monitoring teams; and
- xiii. (Remedies and/or penalties for non-compliance or violation of the terms and conditions which includes applicability of customary laws and imposition of sanction/s;

The indigenous people's development plan as appended to the NCIP-required MOA will be submitted to ADB for review and concurrence.

6. Grievance Redress Mechanism

Grievance is defined as a complaint or concern that is raised by either individuals or groups from affected communities of the Project (IFC, 2009). Grievances can either be perceived or observed wrongs or other causes of complaint/protest by either the company (TIPI) or their contractors during the Project life. The purpose of the Grievance Redress Mechanism is to ensure that the affected communities concerns and expectations on the Project execution are acknowledged, addressed, and if possible, resolved. The current Grievance and Redress Mechanism (GRM) is to solve problems within SAQ member's or SAQ coordinator's jurisdiction. The problems that cannot be solved by the SAQ's are to be resolved by the legal officer.

A formal Grievance Redress Mechanism will be established by TIPI to receive and facilitate resolution of the affected individual/groups complaints or concerns regarding the project's environmental performance. A hotline will be established for concerns outside of the local SAQ's jurisdiction, a record keeping of the complaints and resolution, and a regular reporting and analysis performed regularly. This process will be proportional to the nature and scale of the project impacts, will be culturally appropriate, fair, accessible, transparent, and well-documented. A flowchart of this process will also be created for clarity and transparency. An internal Community Relations Officer is also recommended to be engaged that will have the documentation of the GRM process, including reporting and monitoring, for both internal and external stakeholders as part of their responsibilities.

Once the GRM has been established, a sample grievance registration form shall be published in the local language and/or the IP dialect to TIPI's website, and a comment/complaints box at the participating Barangay and Municipalities Halls, with the process of addressing the concern/complaint well documented. The process of addressing the grievances shall be done well-documented, proportional to the grievance, culturally sensitive and appropriate, reasonable, accessible, transparent, and resolved in a timely manner. All contractors will be required to implement the procedure and report grievances to TIPI.

Every grievance shall be considered private and will be registered. Grievances can be submitted either in writing or verbally. A Grievance Database will be created to record and track all submitted grievances, as well as the process for addressing and resolving the registered grievances. Responsible parties will also be identified and registered. A dispute resolution mechanism and a monitoring and evaluation framework for continuous community feedback and improvement of the GRM. Within one (1) month of TIPI responding to the grievance, TIPI shall verify that the situation has been satisfactorily resolved with all individuals/groups involved prior to closing out the grievance in the Grievance Database.

IP Grievance Redress Procedure. Conflicts within the affected IP community will be addressed within the community itself in the context of its customary law and customary dispute resolution process and mechanisms, in the presence of the relevant staff of the NCIP office with jurisdiction over the area, and if so invited, project-related staff and other stakeholders, e.g. formal local leadership in the barangay and/or the municipality. Inter-community conflicts will be addressed between the communities themselves, according to their customary or agreed upon dispute resolution processes and mechanisms. If an outside facilitator, mediator, or arbiter is required or requested for, TIPI will seek the intervention of the NCIP to act as facilitator, mediator, or arbiter. This guideline applies to conflicts or disputes between the IP community and any of the project units and implementers.

The grievance focal from the site acquisition team will document the proceedings of the discussion or negotiations. This is in addition to the documentation done by the IP community themselves and by the NCIP. If no satisfactory result or impasse results, the IP communities shall be allowed to elevate their complaints and grievances to the Regional NCIP. The grievance procedure established herein in no way substitutes for or replaces the grievance procedure set forth in The Free and Prior Informed Consent (FPIC) Guidelines of 2012. At their choosing, the IPs may avail of the grievance procedure and mechanisms spelled out in The Free and Prior Informed Consent (FPIC) Guidelines of 2012.

ADB's Accountability Mechanism. In addition to the project GRM, ADB's accountability mechanism (May 2012) also applies to the project. The accountability mechanism provides opportunities for people that are adversely affected by ADB-financed projects to express their grievances, seek solutions, and report alleged violations of ADB's operational policies and procedures, including safeguard policies. ADB's accountability mechanism

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comprises of (i) consultation led by ADB's special project facilitator to assist people adversely affected by ADB-assisted projects in finding solutions to their concerns and (ii) providing a process through which those affected by projects can file requests for compliance review by ADB's Compliance Review Panel.

7. Institutional and Implementation Arrangement

Tiger Infrastructure Philippines, Inc. (TIPI), TIPI, a special purpose vehicle incorporated in the Philippines in February 2020, will be the primary responsible for the overall project coordination and management, including compliance with the safeguard requirements. TIPI is 100% owned by Tiger Towers Investment Pte. Ltd. (TTI) based in Singapore. Cell Tower Services Pte Ltd (CTSP) and Daily Life Renewable Energy (DLRE) are the project sponsors. Both have a strong track record from previous tower-related projects deployed outside of the Philippines. Operation and maintenance will be performed by TIPI in-house.

TIPI will designate an Environment and Social (E&S) Safeguards staff to manage and monitor E&S concerns. The E&S staff will be responsible for overseeing site selection, and EPC implementation of ESMP and semi-annual safeguard reporting to ADB and other lenders. It will be involved in grievance redress resolution and information dissemination/disclosure. The E&S staff will also maintain a register for legal requirements for the project, including additional base maps (ie. Land use map, land cover map) in the site selection process to avoid tenurial conflict, coordinate with NCIP for areas within CADT.

TIPI has its in-house team for site acquisition and permitting (SAQ). Within the [INFORMATION REDACTED] radius search rings provided by [INFORMATION REDACTED] (off taker and equipment supplier), the SAQ determines the most appropriate site based on legal title, technical, permitting, E&S, security and access considerations. Sites that would result in IR impacts will not be considered Likewise, sites that would adversely affect cultural sites and environmentally sensitive sites will be excluded. This will ensure that IR impacts and significant adverse impacts on IPs are avoided.

TIPI will establish their ESMS and include the company structure, key personnel, and responsible persons for environmental and social performance. The management measures identified in this report will also be integrated in the ESMS, with other social and environmental measures.

Table 7-1. TIPI and Contractor Roles and Responsibilities

Role	Responsibilities
Company	
Board	<ul style="list-style-type: none"> Annual budget allocation approvals
Chief Executive Officer	<ul style="list-style-type: none"> Overall responsible for the design, implementation, monitoring, and reporting of the social management measures Ensure that the social management measures are communicated and understood by all employees, contractors, stakeholders, and the public Define, document, and convey the social management roles and responsibilities Ensure the ongoing allocation of sufficient human and financial resources to achieve effective implementation of the social management measures, including programs for awareness and skills training Relationship management of key delivery partners, including the Government, Non-Government Organizations, and ADB.
Environmental Specialist(s) / Social Development Specialist(s)	<ul style="list-style-type: none"> Responsible for the management of environmental and social impacts from the Company Ensure that Contractors and their employees are oriented with all environmental and social requirements, management plans, and procedures Ensure compliance with ADB safeguards and relevant legislation

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Role	Responsibilities
OHS and Quality Specialist	<ul style="list-style-type: none"> • Ensure that all personnel are made aware of the social and environmental responsibilities • Maintain a risk register and update the status of the risk mitigation plans • Confirm necessary licenses/permits to be obtained for the Projects construction and operations phase • Confirm compliance with legal requirements and other environmental and social management obligations
Site Acquisition (SAQ) Manager	<ul style="list-style-type: none"> • Ensure the compliance of the SAQ process and Officers to company policies and procedures • Track and document reports on SAQ performance and preparation of timely release of payment requisition for landowners/lessors • Identify SAQ contractors, prepare documentation for the approval and appointment, and performance of the SAQ contractors against relevant procedures • Liaise with the stakeholders, including the communities and government agencies • Ensure the implementation of the GRM during the SAQ process
SAQ Officer(s)	<ul style="list-style-type: none"> • Identify candidates for land leases, to be based on technical criteria, business direction, and local regulations (e.g. land use) • Negotiate lease acquisitions and amendments required for the Project • Assist in tracking and reporting of the SAQ process updates and preparation of the timely release of payment requisition for landowners/lessors • Perform quality control, documentation, and tracking of the SAQ process and lease agreements • Coordinate, order, and track the titles, surveys, and environmental reports, structural analysis, regulatory reports, and constructional plans and drawings • Prepare and update site status reports and tracking database, site close-out packages, and attend meetings and deployment calls, as required • Liaise with the stakeholders, including the communities and government agencies • Ensure the implementation of the GRM during the SAQ process
Project Management Unit	<ul style="list-style-type: none"> • Oversee the Project Administration, Project Implementation Management, and Financial Management for IPP Programs • Coordinate with the implementing agencies during project activity planning and delivery • Manage the contract with ADB • Monitor and support the Projects compliance ADB safeguards requirements during Project implementation • Ensure collection and integration of the Project's monitoring data • Prepare Project Reports in accordance with ADB requirements • Assist in preparation of Project Financial Statements in accordance with ADB requirements
SAQ Contractor	<ul style="list-style-type: none"> • Implement the SAQ Process, including providing direction and relevant training to Contractor employees • Implement Company Procedures, as directed • Ensure the compliance with relevant legislation, as well as industry good practice, when delivering work

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Role	Responsibilities
	<ul style="list-style-type: none"> • Provide regular monitoring, audits, and review of the compliance with the Social and Environmental requirements, and continuously identify points of improvement and corrective actions • Liaise with the stakeholders, including the communities and government agencies
Site Project Manager(s)	<ul style="list-style-type: none"> • Implement Company Procedures, as directed • Ensure the compliance with relevant legislation, as well as industry good practice, when delivering work • Provide direction in implementing Social Management Measures, including delivery and relevant training, to the Contractor employees • Provide regular monitoring, audits, and review of the compliance with the Social and Environmental requirements, and continuously identify points of improvement and corrective actions • Investigate and report any observed or reported non-conformances, complaints, incidents, emergencies, or break of approval conditions to TIPI • Liaise with the stakeholders, including the communities and government agencies

EPC Contactor. Project construction will rely mainly on the engineering-procurement-construction (EPC). TIPI has an agreed EPC contract with [INFORMATION REDACTED]. The EPC contractor will be primarily responsible for reviewing the site list for colocation potential, conducting site search, securing permits, conducting technical surveys, preparation of site acquisition report, supporting negotiation and finalization of lease agreements, access road negotiations and finalization of agreement with the landowners and conducting the civil works. The EPC will have its own full-time E&S team to handle negotiations and documentation of the negotiation and agreements, as well as grievance redress. Both the TIPI and EPC contractor staff of the EPC contractor will need to be oriented on the ESMS and IPPF requirements.

National Commission on Indigenous Peoples (NCIP). The NCIP is the primary government agency through which ICCs/IPs can seek government assistance. The IPRA vests upon the NCIP the power to issue certificate of ancestral land/domain title (CALT/CADT) (IPRA, Section 44e). It has the power to issue appropriate certification as a pre-condition to the grant of permit, lease, grant or any other similar authority for the disposition, utilization, management, and appropriation by any private individual, corporate entity or any government agency, corporation or subdivision thereof on any part or portion of the ancestral domain taking into consideration the consensus approval of the ICCs/IPs concerned.

NCIP AO No. 3 S. 2012 vests upon the NCIP Regional Office the responsibility to receive applications for the issuance of Certification Precondition. It is responsible for the conduct of the Field Based Investigation (FBI) and overseeing the process for obtaining the Free and Prior, Informed Consent (FPIC) from the affected IPs/LCCs. The NCIP also validates expressions of voluntary initiation or solicitation for certain projects made by IP communities.

Local Government units (LGUs) and Barangays. LGU and barangay support is also critical particularly in engaging with the community and in providing the necessary documents and permits for construction and operation. LGUs and barangays can also be engaged in grievance redress and information dissemination.

8. Monitoring, Reporting, and Evaluation

The project is subject to environment and social safeguards monitoring and reporting. The TIPI's E&S staff will serve as the Project's internal monitoring body with support from TIPI's SAQ team and EPC HSSE team which are the primary point of contact in the site selection/acquisition/negotiation process. Monitoring reports will be submitted to ADB for review and uploading on the ADB website.

Internal monitoring report on social will cover:

- i. Site selection, and screening, including status of agreements and documentation;
- ii. For sites within CADT/CALT/ancestral domain, status of the FBI and FPIC process and agreements with the IP communities;
- iii. Staff orientation on safeguards;
- iv. Public information/public consultation activities and grievance redress, including status of resolution;
- v. Other social development items including status of compliance with core labor standards/requirements, and labor-related grievance resolution, etc.

Monitoring and Evaluation is done to assist the Project in assessing the progress of the IPP as well as the adequacy and effectivity of the mitigation measures in addressing the social impacts resulting in the Project's implementation. This will also aid TIPI in determining whether the ICCs/IPs and other stakeholders have issues or concerns regarding the Project implementation, as well as the response to these issues and concerns.

TIPI will establish an ESMS that shall include the framework for the Monitoring and Evaluation for the whole organization. A Monitoring and Measurement Procedure will also be prepared to guide the 'what, when, and by whom' the monitoring will be monitored. The monitoring records will be kept for review and reporting by the management and the results of the monitoring will also documented. The monitoring results will also be reviewed for continuous improvement of the environmental and social performance, as well as to be considered for unforeseen events and impacts.

8.1 Monitoring

The potential impacts on the ICCs/IPs were discussed in **Section 4**, and the monitoring and performance measures for these impacts are discussed below. The Project is currently at the pre-construction stage which involves securing tower locations and local permits. At this stage, the Performance Indicators focus on the SAQ process and whether the commitments made in the IPP are met. The action measures shall also conform with relevant legal requirements and good industry practices. Some process indicators are presented in the succeeding Table, this will be further developed and improved in consultation with the impacted ICCs/IPs and other stakeholders.

Table 8-1. Monitoring Areas and Performance Indicators

Monitoring Area	Performance Indicators
Compliance	<ul style="list-style-type: none"> • Compliance with TIPI's Code of Conduct, Policies, and Procedures • Signed Contract of Lease (COL) and Memorandum of Conformity (MOC), if applicable • Technical Site Survey Reports (TSSR) Completed • Contractor/Supplier compliance with the terms of agreements
Consultation and participation	<ul style="list-style-type: none"> • Number and mode of delivery (e.g., presentations, project brief in print) of the Project Disclosure • Implementation of consultations according to Stakeholder Engagement Plan in the ESMS

Monitoring Area	Performance Indicators
	<ul style="list-style-type: none"> • Number of consultation meetings held with IPs as part of TIPI's ESMS and consultations required by NCIP as part of NCIP AO No.3 Section 24 • Awareness and understanding of the IPs on the project details, impacts and opportunities, and proposed mitigation and enhancement measures
Grievance Redress	<ul style="list-style-type: none"> • Awareness and understanding of the Grievance Redress Mechanism by the stakeholders • Number of grievances recorded and resolved
Management and beneficial measure implementation	<ul style="list-style-type: none"> • Number of mitigations and programs implemented against those declared in the ESMS and corresponding budget. • Timing of implementation against the project phases

The outcome indicators and targets for the Project will be included to measure the results of the processes, where possible. This will be further developed throughout Project Life and as the Social Development Programs (SDP) develops and matures. Initial outcome performance indicators are presented in the succeeding table. This shall be continuously improved upon and developed.

Table 8-2. Outcome Indicators

Impact	Outcome/Objective	Performance Indicators
Change in Land Use	Land use change cannot be completely avoided with the installation of the towers but the area that will be utilized can be minimized. Fencing and buffer can also be tailor-fit to harmonize with the surrounding land use and landscape.	<ul style="list-style-type: none"> • Disturbance area does not exceed maximum of 225 sqm or the declared project footprint in Detailed Design Drawing (DDD) per tower. • Existing vegetation and land cover outside the disturbance area is preserved • Existing structures and access outside the disturbance area is preserved.
Loss of Community Cohesion during the pre-construction and construction phase as a result of inadequate consultations	<p>Avoid adverse impacts to the Community Cohesion through the Project's application for a CP with NCIP, including a RoC from the community during the pre-construction phase.</p> <p>Avoid adverse impacts to the Community Cohesion from the Project activities during the construction phase.</p>	<ul style="list-style-type: none"> • No project-induced in-migration • Documented community engagement activities, including assemblies and consultations • Number of local IPs hired during the construction phase • No net changes in alcohol and drug use, as well as anti-social behavior
Damage to or loss of tangible archaeological and cultural heritage values during site preparation and construction	Avoid disturbance or damage to tangible heritage values	<ul style="list-style-type: none"> • No disturbance or damage to tangible heritage values • Compliance with Section 25 of NCIP AO No. 3, Excluded Areas
Decline in intangible cultural heritage due to influx of workforce	Minimize loss of intangible heritage values due to the Project implementation	<ul style="list-style-type: none"> • No changes in the traditional language use and cultural practices
Increased exposure to health and safety risks due to	Avoid exposure to health and safety risks due to construction activities,	<ul style="list-style-type: none"> • Number incidences of health and safety grievances related to the construction phase

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Impact	Outcome/Objective	Performance Indicators
construction activities, waste generation, and emissions	including waste generation and emissions	<ul style="list-style-type: none"> Documented removal of all construction generated waste during construction and maintenance from the site
Increased exposure to community health risks due to potential transmission of communicable diseases from the influx of workforce	Reduce incidences of workforce or community health and safety accidents or disease transmission	<ul style="list-style-type: none"> Maximum of 3% of the total construction workforce with incidence of accident or injury at any one point No COVID-19 transmission linked to the Project workforce. No increased incidence of communicable diseases in IP communities from the construction workforce
Discrimination against women and other vulnerable sectors during consultations, procurement of services, and local employment	Avoid workplace discrimination of minorities and women	<ul style="list-style-type: none"> Number of women and minorities hired during the construction phase Number of local ICCs/IPs hired during the construction phase Incidences of discrimination and/or workplace grievances Incidences of gender-based violence
Temporary increase in noise levels, emissions, and dust generation during the construction phase	Limit the effects of noise levels,, air emissions, and dust generation on adjacent community during the construction phase	<ul style="list-style-type: none"> Level of noise and concentrations of emissions and dust are within the National Pollution Control Commission (NPCC) levels and the IFC EHS General Criteria Fuel efficient generators with low sulfur fuel are used Noise and emissions levels to retained within the relevant legislative criteria Number and frequency (including time of use) of the generator set/s to be used during the construction phase
Increased exposure to security risks during tower construction and operations	<p>Avoid security incidents and local conflict</p> <p>Avoid incidences of security threats/risks utilizing fencing and locally hired security personnel to monitor the site, as necessary</p>	<ul style="list-style-type: none"> Number of incident or security reports Number of incidences, including accidents and injuries, relating to access and security
Prolonged exposure to low grade EMF during the operation phase	<p>According to the IFC EHS Guidelines for Telecommunications (2007), there is no empirical data quantifying the health impacts of prolonged exposure to EMF. However, public perception needs to be managed with regards to perceived EMF impacts. Outcome/objective is increased awareness and understanding of stakeholders about EMF related to</p>	<ul style="list-style-type: none"> 100% of Project-affected IPs provided access to factual and reputable information on the effects of EMF. Number of project disclosures (in presentation and print) and consultation meetings discussing the project and the effects of EMF. Project impacted ICCs/IPs, and other stakeholders are provided with reputable information on the effects of

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Impact	Outcome/Objective	Performance Indicators
	<p>project from factual and peer-reviewed sources of information.</p> <p>Manage community perceptions of EMF Effects</p>	<p>EMF, and this information be made available in easily accessible locations</p>
<p>Opportunity to improve the quality of life and craft appropriate social development programs with the understanding of the needs of the local community and provision of adequate land/asset valuation</p>	<ul style="list-style-type: none"> • Implementation of social development programs or community assistance addressing the needs of the IPs • Increased number of IPs with access to social development programs and community assistance 	<ul style="list-style-type: none"> • Number of social development programs or community assistance implemented • Number of IP beneficiaries of the social development programs and community assistance
<p>Opportunity for direct employment, increased income through provision of other services or supplies, and learning of new skills or on-the-job training for IPs and members of the community</p>	<p>Increased number of IPs directly employed or indirectly benefitting from project through livelihood</p>	<ul style="list-style-type: none"> • Number of IPs hired during construction and operations • Number of business opportunities or services resulting from the project construction and operations
<p>Increased access to telecommunications services that will, in turn, improve access to education, livelihood, health, and basic services that are dependent on communications and digital technology</p>	<p>Maximize access to basic services, health, and education associated with the project</p>	<ul style="list-style-type: none"> • Key education indicators such as improved access to quality educational materials and online learning, improved literacy, improved technology and digital information use, awareness of early childhood care and development, and improved performance in school assessments. • Key health indicators such as increased awareness and improved knowledge on health issues and health facilities and improved access to regional and national health agencies such as Department of Health (DOH) information bulletins, access to Philippine Health Insurance Corporation (PhilHealth) • Key health indicators such as reduction of safe water, sanitation and hygiene (WASH)-related illnesses and reduction of mortality and morbidity for common lifestyle diseases. • Improvement in access to internet and cellular connectivity and use of these technology to access reputable government information and announcements, disaster risk reduction measures, and request for basic services such as water and electricity.
<p>Increased livelihood opportunities and access to utilities with business establishments, local community centers, and</p>	<p>Maximize socio-economic benefits associated with the Project</p>	<ul style="list-style-type: none"> • Key economic indicators such as increase in IP household income, employed IPs, and women and

Impact	Outcome/Objective	Performance Indicators
basic services potentially constructing markets and facilities near the tower sites		vulnerable groups with livelihood and savings <ul style="list-style-type: none"> • Increased number or variance in livelihood opportunities • ICCs/IPs knowledge of

The extent and frequency of the Monitoring and Performance measures will be proportional to the potential impacts of the Project. Additional monitoring or corrective actions may be conducted if a grievance is submitted through the GRM, or if any incident occurs.

The IPP management measures implementation will be monitored by TIPI to ensure that the ICCs/IPs benefit from the Project, and any adverse impacts are mitigated in an adequate and effective manner. The IPP management measures shall also determine the possible presence of issues and concerns of the Project stakeholders, including ICCs/IPs, and corrective actions to address these issues and concerns.

8.2 Reporting and Evaluation

TIPI will prepare and submit social monitoring reports to ADB semi-annually. The reports will contain close-out reports by Contractors for each of the tower sites completed within six (6) months from the date of the report, with lessons learned and the implementation of corrective actions. These reports will also include the progress of Project implementation, updates on the beneficiaries, challenges related to IPP implementation, any potential breaches of requirements on compliance or safeguards, and received grievances through the GRM.

TIPI will solicit regular feedback during the operational performance, and this will be evaluated through a corrective action system to ensure that continuous development and improvement. Incident reports will be analyzed to determine opportunities of improvement. The long-term monitoring data and trends will be evaluated and implemented through the management review process, with corrective actions identified to achieve TIPI's policies, objectives, and commitments. TIPI will undergo audits that will assess compliance the national laws and regulations, ADB SPS requirements, and internal policies and procedures as laid out in their ESMS.

9. Budget and Financing

The management and enhancement measures to address project-related impacts contained in this IPPF will be funded by TIPI from the Project capital expenditures, construction, and operations costs. Specific activities and cost items are presented below.

Table 9-1. Summary of Activities with associated costs

Project Phase	Activity	Cost Item
Pre-Construction	Project disclosure and community consultations	Manpower, trainings and expenses cost to conduct project disclosure and community consultations
	Site selection and implementation of SAQ	Manpower and expenses cost to implement SAQ including cost to train TIPI staff to incorporate management measures in site selection and acquisition
	Social Impact Assessment for project-affected households and communities	Cost of social impact assessment or survey, inventory of structures or assets that will be affected, and procurement of data to validate land classification
	IP consultations and approvals	<ul style="list-style-type: none"> • Cost to secure Certificate of Non-Overlap to establish non-coverage in ICCs • Cost to support regional NCIP validation/verification if site is within ancestral land title or claim or ICC • Manpower and expenses cost to conduct FPIC process, in cooperation with NCIP, with the prescribed number of meetings with the ICC
	Implementation of ESMS, information disclosure, and grievance redress mechanism	<ul style="list-style-type: none"> • Manpower and expenses cost for staff capacity-building on the implementation of ESMS, mitigation and enhancement measures, and the grievance redress mechanism. • Hiring of social or community relations specialist
Construction Phase	Security measures	Manpower cost for security personnel including trainings
	Noise, emissions, and dust management and monitoring	Manpower and expenses cost to conduct regular monitoring of noise, emissions, and dust levels during construction period
	Continued community disclosure and progress update	Manpower and expenses cost for project progress disclosure and community engagement, implementation of the ESMS, and the grievance redress mechanism

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Project Phase	Activity	Cost Item
	Local procurement and employment	Consultations and engagement with community particularly employee services office or equivalent to source local manpower and services
	Skills training	Training cost, in cooperation with local agencies, to train local labor
	Waste Management	Training and manpower cost to designate an on-site environmental unit or pollution control officer (PCO) and expenses cost to engage third party waste haulers as necessary.
	Community Assistance and Benefits Enhancement Programs	Cost for consultations, planning, and implementation of programs with IPs and/or community
	Monitoring and Reporting	Costs for monitoring and reporting the implementation of the ESMS and associated management plans
Operations Phase	Community Assistance and Benefits Enhancement Programs	Cost for consultations, planning, and implementation of programs with IPs and/or community
	Information campaign on EMF	Staff and expenses cost for regular information disclosure and community engagement
	Livelihood and community assistance	Cost for implementation for drafting and implementation of programs
	Monitoring and Reporting	Costs for monitoring and reporting the implementation of the ESMS and associated management plans
	Security measures	Manpower cost for security personnel including trainings

Appendix A. TIPI SAQ Process

[INFORMATION REDACTED]