

Government of Afghanistan
Ministry of Mines and Petroleum (MoMP)

Stakeholder Engagement Plan (SEP)
For
Afghanistan Gas Project (AGASP)

September 17, 2019

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1. Introduction/project description

1.1. Background

1. Afghanistan is a landlocked and mountainous country located in south-central Asia. It has border with Pakistan in the south and east, Iran in the west, Turkmenistan, Uzbekistan and Tajikistan in the north, and China in the far northeast. The coordinates of Afghanistan are between latitudes 29° and 39° N, and longitudes 60° and 75° E. The climate varies by region and tends to change quite rapidly. Afghanistan is administratively divided into 34 provinces (wilayats), with each province having a capital and a governor office. The provinces are further divided into about 367 smaller provincial districts, each of which normally covers a city or a number of villages. Each provincial district is represented by a sub-governor, usually called a district governor. The medium and long term economic development potential of the mineral and hydrocarbon sectors is greater than any other sector in Afghanistan's economy. Geological survey work covering only approximately 10% of the country has indicated a rich store of mineral resources. Most notably, Afghanistan possesses massive reserves of copper and iron ore. There are abundant deposits of decorative and precious stone as well as coal, gold, and other minerals; and construction materials such as sand and gravel. Afghanistan's proven gas reserves amount at 82.5 billion cubic meters of gas and over 70 million barrels of oil; these figures however are more than 20 years old and considered conservative.
2. The proposed Afghanistan Gas Project (AGASP) is designed to facilitate gas delivery to the Mazar and Sheberghan Independent Power Plants (IPPs), through investments in key gas infrastructure and strengthening institutional and regulatory capacity. The project incorporates the priorities set in the Roadmap which facilitate institutional strengthening and regulatory restructuring, and building technical skills for resource development. The project has three components as follows: Component A – Sustaining Gas Supply; Component B - Strengthening Gas Sector Governance; and Component C - Project Management. A detailed summary of each of the components is provided below.
3. **COMPONENT A: SUSTAINING GAS.** The objective of this component is to support the sustained supply of commercial quality natural gas for Sheberghan and Mazar IPP power generation and industrial uses through (a) targeted technical assistance and transaction support to hydrocarbons related investments in the near and mid-term, and (b) support to the construction and installation of natural gas infrastructure, including a pipeline and gas processing facility.
4. **Subcomponent A1. Operationalizing private sector gas development opportunities.** The Bank is not investing in upstream field development, and rather this subcomponent will provide transaction and technical advisory support to the GoA on preparation of the tender process and award of contracts for the development of the Totimaidan gas block. It is expected that most capacity building efforts under this activity will focus on practical on the job training, which may have broader applications across the sector.
5. **Subcomponent A2. Gas Infrastructure.** The objective of this subcomponent it to provide technical support to MoMP and AGE to ensure sustainable natural gas deliverability including the development and optimization of upstream field facilities, midstream transport and downstream distribution value chain, initially in compliance with supply commitments assumed by the government with the Sheberghan and Mazar IPPs and, eventually, for the use of domestic natural gas for industrial, commercial, residential and transport use. Specific activities under this sub-component will include:

Technical assistance and equipment for the construction of New Sherberghan-Mazar gasline; Equipment, TA, and Capacity Building for the Operations and Maintenance of Gas Processing Field Facilities; Technical Assistance and Capacity Building to AGE on Yatimtaq Gas Fields, to supply Sheberghan and Mazar IPPs.

6. **COMPONENT B: STRENGTHENING GAS SECTOR GOVERNANCE AND REGULATIONS.** The objective of this component is to address the institutional, contractual and regulatory gaps that persist in the management of Afghanistan's hydrocarbon resources, thereby improving predictability, transparency and functionality of the sectors. Emphasis will be given to the MoMP upstream role as policy-maker as well as establishment of sector regulatory bodies such as the AOGRA (created 2018). This component will support strengthening of sector governance.
7. **Subcomponent B1 Strengthening of Key Institutional Activities.** Specific activities financed through Subcomponent C1 include the following: Supporting the sustainable administration and management of the MoMP; Building capacity for the environmental and social management of the sector; Implementing the Extractive Industry Transparency Initiative (EITI).
8. **Subcomponent B2. Strengthening regulatory and monitoring institutions governing sector activities.** (*Beneficiaries: MoMP, AOGRA*). (**US \$4 million**) As set out in the Government Mining Sector Roadmap, the regulatory functions of the MoMP in the oil and gas sector have been devolved to the newly established Afghan Oil and Gas Regulatory Authority. AGORA is a new regulatory body and requires significant technical assistance and capacity building for effective implementation.

1.2. Project location(s)

9. The project covers the following sites:
10. The development of Afghanistan's hydrocarbon resources has been identified as a critical link for long-term energy security and diversification of fuel supply, economic growth and stability for the country. Over the short-term, indigenous gas resources offers opportunities for increased energy access and energy security, and creates the space for the deployment of variable, intermittent renewable energy. Hydrocarbons development has the potential to meet a longer-term goal - to increase Afghanistan's integration into regional (Central/South Asia) development initiatives, including projects such as the TAPI (Tajikistan, Afghanistan, Pakistan, India) Pipeline.
11. **Mazar and Sherberghan Gas Power Plants.** Afghanistan has yet to demonstrate a fully integrated "proof of concept" investment to develop and deliver natural gas to credit worthy customers. It is expected that the development of Afghanistan's hydrocarbons potential will be initially anchored in the expansion of domestic uses of natural gas and fundamentally in the expansion of gas-based electric generation capacity as part of current efforts to increase availability of power and energy from domestic generation. Two main gas-to-power projects are being considered: (a) a 50 MW gas power plant in Mazar-e-Sharif ("the Mazar IPP") (project agreements, including Power Purchase Agreement [PPA], signed in January 2018); and (b) a 40 MW gas power plant in Sherberghan ("Sherberghan IPP") (project agreements signed in March 2018). The implementation of both projects will be dependent on confirmed access to sufficient and sustainable gas supply from currently productive fields, sustained investment in the development of upstream gas production, and processing capacity to ensure long-term gas supply. Other industrial consumers will also critically depend on sustainable supply of gas.

The proposed Sheberghan IPP project is based on a mobile gas turbine generator. Sheberghan IPP has entered into a five-year PPA with Da Afghanistan Breshna Sherkat (DABS), with the possibility of extension. The Mazar IPP and DABS have entered in to a 20-year PPA with commissioning targeted for January 2021. Gas power plants by IPPs with medium to long term PPAs strengthen the case for gas sector development. They will also serve as an effective on-the job capacity building opportunity in support of the expansion of gas-based power generation, which will eventually improve energy self-reliance. The World Bank Group is supporting these public private partnerships through possible loans from International Finance Corporation and guarantees from the World Bank and Multilateral Investment Guarantee Agency. The Government of Afghanistan faces an urgent need to increase gas production and transportation from current 330 Mscmd up to 1,130 Mscmd to supply fuel gas for Sheberghan IPP and Mazar IPP, which are planned to be commissioned in 2020/2021.

12. **New Sheberghan-Mazar Gas Pipeline (SMPL)** In addition to its efforts to rehabilitate the existing Sheberghan-Mazar pipeline and in light of the limited practical scope for its refurbishment, TFBSO purchased and delivered another 94.5 kilometers of pipe and associated materials for the construction of a new 89.1-kilometer (12 inches in diameter) gas-line. Starting in 2016, AGE began to undertake the construction of the new gas-line, and 44 kms have been laid along the route of the old structure. The evaluation by the supervision engineers (procured with Bank Support) indicates that AGE engineers have necessary skills to construct the gas-line if equipment, devices, materials, etc. are procured, proper standards and procedures are followed under expert supervision, and all design, engineering and project documents are prepared to international quality and safety standards. The Government of Afghanistan and AGE require additional support to complete the design, engineering, supervision and construction the entire 89.1-kilometer (12 inches in diameter) Sheberghan-Mazar gas-line.
13. **Yatimtaq Gas Field.** The Yatimtaq gas field is located approximately 18 kilometers east of the City of Sheberghan and covers an area of nine square kilometers. Geologically the field lies within the Amu Darya Basin which extends from the prolific gas-prone basins of Turkmenistan and Uzbekistan into northern Afghanistan. The Yatimtaq Field was the first gas field discovered in Afghanistan in 1960. By 1988 a total of 35 wells had been drilled.
14. **Totimaidan Gas Block.** The block, located west of Sheberghan, covers 7,131 square kilometers in the Afghan sector of the Amu Darya basin. It includes the undeveloped Juma and Bashikurd gas fields and large exploration acreage with significant potential extending to the border with Turkmenistan. McDaniel estimates that the two fields hold 580 Bcf of gas resources. MoMP has now initiated steps to open the exploration and development of the Totimaidan block for international competitive tender. Earlier, in September of 2014, MoMP announced the successful conclusion of a Tender Agreement negotiation with a consortium of developers for exploration and production rights of the gas-prone Totimaidan block. Over the course of the last several years, however, development of the field with the consortium did not materialize, and by 2018 the contract was still not approved by the Afghan Cabinet and was eventually rescinded.

2. Objectives of Stakeholder Engagement Plan

15. The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure, grievance redress mechanism and consultation, throughout the implementation and operation of the proposed projects. The SEP outlines the ways in which AGASDP and contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project, the gas companies, contractors, and the project(s) themselves.

16. The consultation and engagement with the local population is essential to the success of the project(s) in order to ensure smooth collaboration between project staff, gas companies and local communities and to minimize and mitigate environmental and social risks related to the proposed project.

3. Regulatory Context

3.1. National Regulatory Context

17. Constitution of the Islamic Republic of Afghanistan was ratified in 2004 and while the constitution does not directly address environmental matters, it does lay down the legal framework that guarantees access to information for its citizens. Article fifty of the constitution states that “the citizens of Afghanistan shall have the right of access to information from state departments in accordance with the provision of the law”.
18. The environmental law (2007) of the Islamic Republic of Afghanistan considers the principle of the need for involvement of all interested parties in order to enable environmentally responsible development.
19. Sub-article 5(6) of the Environmental Law states that “adverse effects should be prevented and minimized through long-term integrated cross-sectoral planning and the coordination of government and non-government bodies.”
 - Sub-article 5(10) of the law states that “local communities should be involved in decision-making processes regarding sustainable natural resource management.”
 - Sub-article 6(4) states that “the Islamic Republic of Afghanistan “has the duty to provide the public with information and opportunities to participate in making decisions affecting human health, the environment, and natural resource.”
 - Sub-article 7(6) of the law states that “every person, pursuant to this Act, shall have the right to participate in environmental & social impact assessment.”
 - Sub-article 9(6) states that “the National Environmental Protection Agency (NEPA) shall carry out the following functions and powers “establish communication and outreach for environmental and social information to ensure improved awareness of environmental and social issues.”
 - Sub-article 9(19) of the law states that “the NEPA shall carry out the following functions and powers “actively coordinate and cooperate with ministries, Provincial Councils and District and Village Councils, public bodies and the private sector on all issues related to sustainable use of natural resources and conservation and rehabilitation of the environment.”
 - Sub-article 19(1) “Public participation” states that “affected person may express their opinion on the proposed project, plan, policy or activity, the preliminary assessment, the environmental and social impact assessment, the final record of opinion and the comprehensive mitigation plan, before the approval of the project, plan, policy or activity, and the proponent must demonstrate to the NEPA that affected persons have had meaningful opportunities, through independent consultation and participation in public hearings, to express their opinions on these matters on a timely basis.”
 - Sub-article 19 (2) “Public participation” states that “in regard to a proposed project, plan, policy or activity that is likely to have highly significant adverse effects on the environment, affected person must be allowed the opportunity to participate at each of the phases referred to in sub-article 1 by the NEPA and relevant institution.”
 - Sub-article 19(3) “Public participation” states that “the NEPA shall not reach a decision on any application for a permit until such time that the proponent has demonstrated to the satisfaction of the NEPA that the proponent has distributed copies of the document to affected persons, informed the public that the document is being made available for public review by advertising the document

and displaying a copy of it for inspection, and convened and recorded the proceedings of a public hearing.”

- Sub-article 19 (4) “Public participation” states that “after the NEPA has reviewed the conditions set forth in sub-article 19 (3), the NEPA shall reach a decision and inform the public of that decision and make available any relevant documentation or information for public review.”
- Sub-article 64 (3) states that “the NEPA shall coordinate with relevant ministries and Provincial Councils and District and Village Councils to prepare and carry out public awareness campaigns to inform and educate the public about the value of natural resources, and means to sustainably use and conserve them, and on environmental health, including pollution prevention and control, and on the means to promote them.”

20. Environmental & social Impacts Assessment Regulation (2017) reinforce the importance of the information disclosure and public participation and consultation process to effectively manage adverse environmental and social impacts. Part 1 of regulation 6 states that “within fourteen (14) days of receiving an application and an accompanying screening report, the NEPA shall distribute a notice of public disclosure to landowners, land occupiers and the elders of local communities likely to be affected by the activity identified in the application. The notice shall contain the following information:

- 1) A broad and comprehensible description of the activity and its environmental and social impacts;
- 2) Informing affected persons that an application will be submitted to the NEPA under these Regulations;
- 3) Informing affected persons to register within seven (7) days of the date of distribution of the notice of public disclosure by either: sending a written notice of registration to any office of the NEPA; or registration in person at any NEPA office.

21. Regulation 7: Environmental and Social impact assessment process “If instructed to do so by the NEPA in terms of Regulation 6.3, the applicant shall, in accordance with international best practice, prepare an the NEPA to make a decision in terms of Regulation 8, including: (4) a description of the public participation process undertaken during the environmental and social impact assessment process, particularly in relation to registered affected person; the major issues that were identified during the consultation process; and how these issues were incorporated into the assessment process.”

22. In addition to the requirements of the ESIA Regulation the Afghanistan Labor Law has also very clear direction for the OHS issues in project implementation.

23. Land Acquisition Law- LAL (2018) Sub-article 7.15 states, that “it is the responsibility of the acquiring organization, after the approval of the project and relevant acquisition plan, information regarding the following points shall be provided to the owners of the property and project affected people by the land acquiring organization nine months prior to the implementation of the project through mass media.”

- a) Purpose of the acquisition
- b) Site that is required for acquisition
- c) Type and size of the land
- d) Estimated price of the targeted land
- e) Ensuring just and fair compensation
- f) Start date of the project.”

Hydrocarbons Law (2017)

24. Article 15: Public Access to the Hydrocarbons Register – states that Subject to the prevailing laws of Afghanistan that prohibit the disclosure of State records (publicly registered documents), the Authority, in compliance with the contractual conditions, shall authorize public access to the Hydrocarbons Register without any charge and may also authorize the provision of copies of information entered in the Hydrocarbons Register upon a request being issued and the payment of a

prescribed fee.

25. **Article 18: Provision of Information to Provincial Offices-** states that the Authority shall send the details of Contracts and Licenses, and any amendment, transfer, approval, revocation or termination thereof, as may be entered in the Hydrocarbons Register, to the provincial offices of the Authority in the provinces where the area covered by the Contracts or Licenses is situated. The provincial office, thereafter, shall inform the governor of the relevant province of the information received.
26. **Article 28.1 “Discovery of Historical and Cultural Items”** states that Contractors of Upstream Hydrocarbons Operations and Midstream Hydrocarbons Operations shall immediately inform the department for the inspection of mines, and the department for preservation and repair of historical items, and the Ministry of Information, Culture and Tourism upon finding traces, evidence, or a discovery of any item of historical or cultural significance during operations.

3.2. World Bank requirements for stakeholder engagement

27. The World Bank’s Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, which recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice”. ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. As a requirement of this ESS 10 Standard this Stakeholder Engagement Plan (SEP) was prepared and will be implemented for the whole Gas Project and will be applied to all individual subprojects facilitated by the WBG.
28. As defined by the 2018 ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks.
29. Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner

4. Brief Summary of Previous Stakeholder Engagement Activities

30. **Consultation on draft ESMF and RF for AGASP.** The first round of stakeholder’s engagement activity took place in 30 – 10 – 2018 in MoMP Conference room, Kabul. A total of about 80 participants were invited to the consultations through official letters and electronic media. However only 45 participants attended the workshop. Participants who participated in the workshop were from NGOs, academia, research institutes, international donors, private sector, and affected communities. The remaining 20% were from the government entities such as Ministry of Rural Rehabilitation and Development (MRRD), National Environmental Protection Agency (NEPA) and other public

institutions.

31. Key objectives of the consultation workshop were to:

- Engage stakeholders by making the process more participatory, sharing project information and on anticipated impacts that might arise due to project activities;
- Disseminate project activities to key stakeholders and get their inputs on better mainstreaming of Environmental and Social Management Framework (ESMF) and Resettlement Framework (RF) into the AGASP cycle;
- Seek cooperation from representatives of various NGOs, communities and government agencies in better implementation of the ESMF and RF.
- **Outcome of stakeholder consultation:** participants raised their concerns linked to environmental, social and OHS issues- there were some requests with suggestion on citizen engagement and participatory approaches, GRM and public awareness sessions among the affected communities, including labor issues- lack of facilities for workers. Where appropriate, these have been incorporated into the final documents. Ministry has made efforts to strengthen functionality of GRM to address concerns and complaints.

32. **Consultation on draft SEP.** The draft Stakeholder Engagement Plan (SEP) was shared with stakeholder in the last week of August 2019 for their review and feedback. The hard copies of the SEP were shared with AGE team, amine plant, and local CDC in Mir Qasim village, the affected village along the Sheberghan-Mazar Gas pipeline. The final approved version of the SEP will be re-disclosed in-country on MoMP website and in the WB website.

5. Stakeholder identification and analysis

33. Project stakeholders are people and entities who have a role in the Project, or could be affected by the Project, or who are interested in the Project. Project stakeholders can be grouped into primary stakeholders who are either individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly especially those who are directly affected, including those who are disadvantaged or vulnerable; and secondary stakeholders, who are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them.

34. Thus, Project stakeholders are defined as individuals, groups or other entities who:

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

5.1. Stakeholder Identification

35. It is anticipated that this Stakeholder Engagement Plan (SEP) will help clarify the stakeholder identification procedure at the national level for the forthcoming stages. This will guide all components

of AGASP. The following criteria, adjusted to take account of local specific conditions, are proposed to be used for the identification of stakeholders:

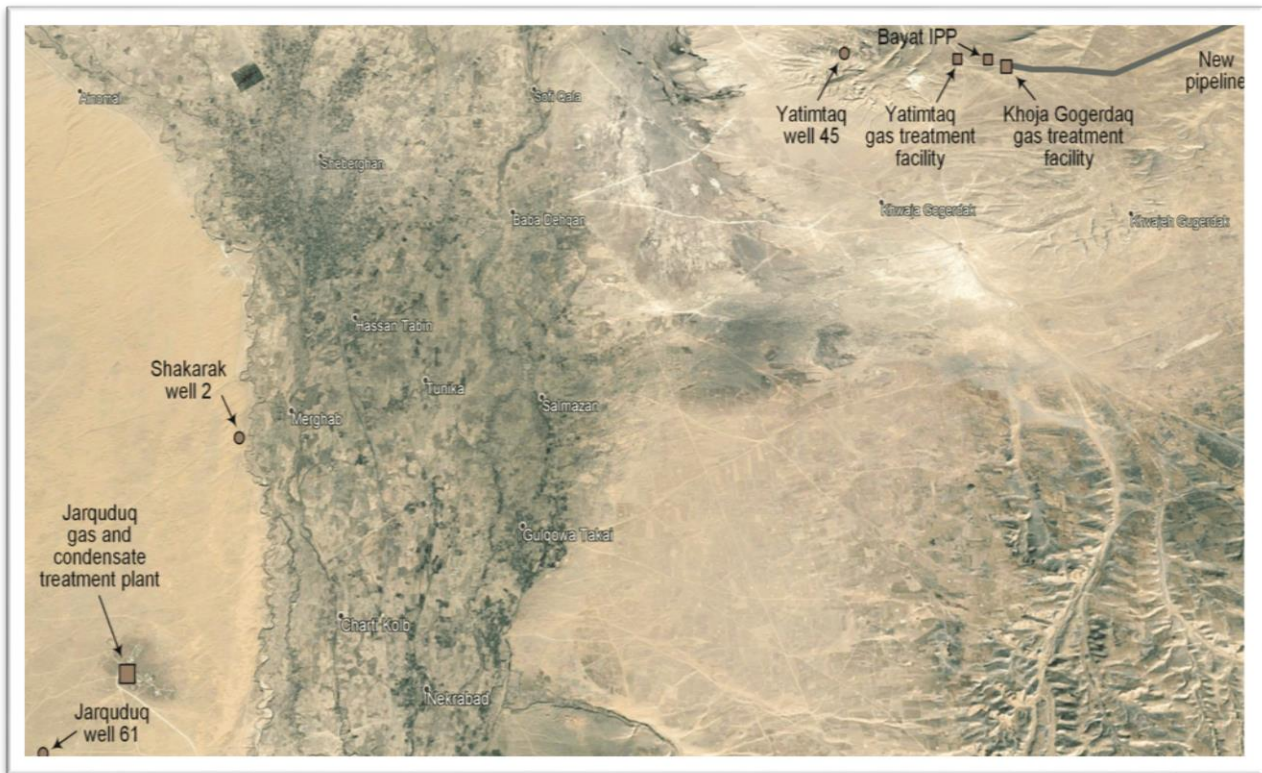
- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- **Influence:** a social group may be able to substantially influence project implementation or on-going operations;
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or on-going operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or on-going operations, and this group is not necessarily directly affected by the planned or current activities

A general list of stakeholder groups identified is presented in **Table** below.

Stakeholder group	Interest/cause in engagement
International level	
Environmental and Social NGOs (i.e. AREU, UNEP)	Scientific understanding of the range or problems associated with the project related to gas.
National level	
Administration (i.e. NEPA, MUDL, MoLSAD, MoJ)	Legislative and executive authorities. Functions of supervision and monitoring
NGOs- IWA,- Integrity Watch Afghanistan,	Represents the interests of different interested parties and vulnerable groups
Mass media- national level TVs and Radios	They are intermediaries for informing the general public about the planned activities of the project developer(s) and for information disclosure in connection with the proposed project(s).
Scientific structures- Academia from Kabul university , Green Tech	Scientific understanding of the range or problems associated with the proposed project(s). Scientific approach to the relevant issues. Possible specialists' provision for further activity in project implementation, consultants involved in background studies.
Business community Bayat IPP Gazanfar group	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Project employees and Project's sub-contractors – AGE staff	Technical understanding of the range or problems associated with the proposed project(s) including H&S issues.

Stakeholder group	Interest/cause in engagement
Provincial and district level	
Administration of NEPA (local), DUDL, DoLSAD	Legislative and executive authorities. Functions of supervision and monitoring
Local NGOs-	Represents interests of different interested parties and vulnerable groups
Mass media local TVs/radio – Mazar (Arzo TV), Logar & Sheberghan (Aina TV)	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Local communities- along the full length of Sheberghan-Mazar pipeline, amine plant and the surrounding villages of the proposed gas sites	Directly or indirectly affected parties living in regions of seismic activities that could be indirectly affected by the realization of the projects
Local level	
Skilled and unskilled workers, and local communities.	Directly or indirectly affected parties - represents interests of affected communities (land users) and vulnerable groups Workers included: (a) direct workers, such as AGE staff-labors, (b) contracted workers to be hired by gas companies and contractors, and (c) primary supply workers.
Local land users and other local population	Directly or indirectly affected parties - Potential vulnerable groups, affected communities and other interested parties living in the close vicinity to seismic study activity

36. The initial list of the stakeholders may change and get updated throughout the project life. The stakeholder groups to be engaged may be expanded during project implementation.
37. In addition to government agencies and non-governmental organizations, key stakeholders include individuals living within or near the project areas and potential private interests. The map below shows the potential gas sites.



Sheberghan -Mazar gas-line and gas processing facilities

5.2. Stakeholder Categorization

38. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:
- **Government agencies**, MoMP, NEPA, MoLSA, MoUD, ANSA, the relevant Provincial Departments of these agencies, Provincial Authorities and etc. are having mandate to oversee the implementation of various aspects of the Environmental and Social issues.
 - **Directly or Indirectly Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly or indirectly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
 - **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project(s).

39. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project(s) and will enable the project(s) to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project(s) by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

5.2.1. Affected parties

40. As the project is going to start, we outline below parties which are going to be affected by the project:
- People and communities affected by the construction of the gas-pipeline line and Amine Plant- the affected families in the completed segment of 44km gas pipeline have already been identified- the affected families for the remaining 45 km of gas pipeline, including the gas sites (Yatimtaq gas field and Totimaidan gas block) will be identified during the proposed ESIA studies - TBD
 - Local communities at the gas sites

5.2.2. Other interested parties

- **Other related government agencies:** (i) *Ministry of Energy and Water* for IPP implementation and mine-driven water and power improvements; (ii) *Ministry of Commerce & Industries* for harmonization of upstream and downstream regulation
- **License holders and interested investors** will benefit an improved regulatory and investment environment, and strategic implementation of improved infrastructure and energy access.
- Civil Society Organizations working directly with the affected communities,
- **Other Civil Society Organization** and international and national NGOs who have an interest in the extractive industries in Afghanistan
- *National Environmental Protection Agency (NEPA)* for strengthened **management** and implementation of environmental and social safeguards,
- *Ministry of Urban Development and Land (MUDL)* for cadastral survey & land clearance and LAR&R.
- Provincial Valuation team with support from MUDL and provincial authorities will conduct land valuation survey.
- *Ministry of Finance* will benefit from strengthened revenue management;
- **Regulatory agencies** reflecting GoIRA enhanced and new regulatory arrangements, including *Oil and Gas Regulatory Authority (OGRA)* to regulate activities along the oil and natural gas value chain;
- Central and local government entities working directly with the project and its PAFs, such as MoMP and AGE.

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- Extractive Industry Transparency Initiative (EITI) and their Multi-stakeholder Group (MSG)
- Private sectors directly involved with the activities in the project
- Independent Power Producers (IPP) at Sheberghan and Mazar, and as well as other associated private sector actors
-

5.2.3. Disadvantaged / vulnerable individuals or groups

41. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.
42. Within the Project Area of Influence, the vulnerable groups may include and are not limited to the following:
 - Elderly people or war victims;
 - Persons with disabilities and their caregivers;
 - Low-income families/poor
 - Women, particularly women-headed households or single mothers with underage children;
 - The unemployed persons;
 - Nomadic communities
 - Refugees and internally displaced people
43. Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate . Specific measures to address the needs of the poor and women will be put in place through both stakeholder consultation and communication, livelihood restoration and land acquisition. There will be separate consultation meetings conducted with vulnerable group/individuals and the purpose will be to explore the critical issues for vulnerable and what method will be considered to support vulnerable people. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.
44. Disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. In the present context, this would include women, who for cultural reasons have low mobility and are hard to reach, any nomadic community, disabled and any displaced (internally or externally) families among the PAFs. Special efforts will be taken to disseminate project information to these groups and to ensure their inclusion in the stakeholder engagement process.
45. To involve women, particularly among the PAFs, in the Stakeholder Engagement process, the project will employ female staff and work through female representatives of the CDCs in the affected villages, to identify suitable venues and timing for consultations.
46. Any nomadic community potentially impacted by or interested in the project would be identified with the help of the local authorities, who would also facilitate outreach to such groups.
47. Regarding disabled groups, all venues for consultations, workshops and meetings should be selected with a view to facilitate physical access for disabled.

48. Displaced PAFs will be informed about meetings and consultations via other community members in the area, and potentially through radio and social media.

5.3. Summary of project Stakeholder needs

Table 2- summary of stakeholder needs

No	Stakeholder Group	Key characteristic	Languages Need	Preferred notification	Specific needs
1	Local affected communities in the selected sites: a) Local communities directly affected by the construction of the Mazar-Sheberghan gas pipeline and amine plant. b) Local communities to be identified in the TA sites (TBD during project implementation).	a) Eight household in Mir Qasim villages along the length of Sheberghan -Mazar gas pipeline. b) local community within the TA sites (e.g. totimaidan)	Pashto, Dari	Notification via Community Development Councils (CDCs) Focus group discussions, Key informant interview (KII), Radio, stakeholder Workshops and publication of posters in the site. Separate consultation with women and affected persons with a special consideration for vulnerable and disadvantaged groups	a) Identifying suitable location for consultations with PAFs b) Reaching absentee PAFs c) Require special outreach and staffing to include women and vulnerable and disadvantaged groups in Stakeholder engagement
2	Civil Society Organizations: a) Sheberghan- Mazar gas-pipeline: local NGOs c) National level: UNESCO, ARCHE International & Integrity Watch Afghanistan & Extractive Industry, transparency Initiative (EITI) and its Multi-Stakeholder Group	Brief characteristic: There are several civil society groups active in Sheberghan-Mazar sites- these groups represent local communities. IWA is regularly involved in researching linked to extractive in Afghanistan. It also lobbying for	Pashto, Dari, English	Email & mail notification and telephone Presentation and meetings, stakeholder workshop	Capacity building support for local CSOs.

		transparency and accountability in extractive sector.			
3	Local government agencies: a) Provincial Cadastral/land clearance offices of MUDL (, Balkh & Sheberghan) b) Provincial valuation team(Balkh & Sheberghan) c) Balkh and Jowzjan provinces (Faizabad, Aqcha and Chemtaldistricts) d) GRC committees for Sheberghan-Mazar gas pipeline	Details: a) there are 8 families identified along the Sheberghan-Mazar gas-pipeline b) GRC for the gas pipeline has already been established and need training and capacity support.	Pashto, Dari	Email & mail notification and telephone Presentation and meetings prepared the list of these absentee PAPs who migrated long ago and stakeholder workshop	The CDC members has helped to prepare the list of the absentee PAPs- they attend GRC meetings. Issue tazkira or identity cards to the absentee families. Identify and allocate suitable land (alternative relocation site & agricultural plots) for the affected families. conduct land valuation Address grievances relating to project activities.
4	Central Government a) /MoMP b) Government Commission on resettlement plan implementation c) MEW d) Afghan Gas Enterprise (AGE) e) MUDL f) NEPA g) MoLSAD h) MoF	.	Pashto, Dari	Email & mail notification and telephone Presentation and meetings	Translation of project documents into local languages to be shared with these national entities.
5	Business communities: IPP Contractors AGE	Bayat for Sheberghan IPP, Gazanfar for Mazar IPP AGE for Sheberghan – Mazar gas pipeline	English, Pashtu & Dari Languages	Email and mail notification Presentation and meetings-stakeholder workshop	Include translator
6	Vulnerable people	- Elderly people or	Pashtu, Dari	Various tools	Separate

		war victims; - Persons with disabilities and their caregivers; - Low-income families/poor - Women, particularly women-headed households or single mothers with underage children; - The unemployed persons; - Nomadic communities - Refugees and internally displaced people -	and Uzbek	will be used to explore the problems and needs of vulnerable people, such as FGDs/workshop, separate meeting for engagement of vulnerable people.	consultation meetings to be conducted with vulnerable group/individuals to explore the critical issues for vulnerable people.
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Note. The SEP is a living document and will be updated throughout the life of the project.

6. Stakeholder Engagement Program

49. This section describes stakeholder engagement activities that will be implemented by AGASP going forwards, including activities tailored to the specific project phases/developments and for vulnerable and disadvantaged groups as well as the on-going routine engagement.

6.1. Engagement Methods and Tools

50. The project(s) intend to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with statutory officials may be different from a format of liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects and Citizen Satisfaction survey).

6.2. Purpose and timing of stakeholder engagement program

The main goal of stakeholder's engagement program is to create awareness of the key deliverables of the project, keep stakeholders updated on key activities, and provide avenues for affected-people to voice their concerns and grievances.

51. Stakeholder's engagement will take place:

- a. Stakeholder engagement is ongoing within the Sustainable Development of Natural Resources Project, I-II (SDNRP I-II), which precedes the AGASP, and will continue during the preparatory and implementation phases of the AGASP.

- b. ESIA, ESMP, and Resettlement Plan (RP) associated with the Mazar Sheberghan gas-line will be subject to consultations prior to their completion and implementation and continue through semi-annual meetings organized by the PIU Social/SEP Focal Point. The relevant parts of the ESCP will be shared for general orientation on the Government's commitments.
- c. During the 5-year implementation period of the project, it is planned to conduct two meetings annually to update and consult stakeholders on project activities.

6.3. Proposed strategy for information disclosure

52. Multiple channels will be used to publish information linked to project activities. These include: (i) disclosure of all relevant studies in-country in the relevant sites and through the WB website,- the studies will also be made available to local communities in a manner and language to be understandable to them (ii) publication of posters and public notification in the targeted areas accessible to local communities, CSOs and other stakeholder; (iii) broadcasting notification through local and national media, and (iv) stakeholder workshops. Free printed copies of the ESMF/RF and the SEP in local languages will be made accessible for the general public at the following locations:
 - The Project offices
 - Village administrations in in the selected districts (e.g.Balkh & Aqcha);
 - CDCs office along the gas-pipeline.
 - Regional administrations
 - Local NGO offices, such as IWA provincial offices
 - Other designated public locations to ensure wide dissemination of the materials.
53. Electronic copies of the ESMF, ESMP, RP, ENV & SOC Audit, EPSA, RP (as required) and SEP will be placed on the project web-site and as well as MoMP official website. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The web-site will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.
54. The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs as well as other interested parties.
55. The MoMP will employ different means of communication to disseminate information to different categories of stakeholders, and to engage them in consultations:
 - To reach the maximum audience, radio spots (local radio) in national languages will be transmitted;
 - Billboards will be placed in key strategic location, especially near to the project sites, to transmit brief information regarding the project activities and upcoming consultations;
 - Workshop with the local communities for in-depth consultations;
 - Brochures and leaflets which will contain information on eligibility criteria and entitlement matrix- these brochures will be distributed to local people in the Sheberghan-Mazar pipeline and other sites to be selected in near and mid-term for transaction advisory support – Technical Assistance (i.e. Totimaidan andYatimtaq Gas Fields)
 - Press releases/press conferences
 - Consultations in Kabul for all national stakeholder groups, and in district headquarters for all locally based stakeholder groups.

- Separate meetings will be conducted for women from PAFs and other vulnerable and disadvantaged groups (as needed), as women cannot be expected to join non-segregated meetings. Suitable location(s) will be identified with easy access.

Table 3- presents methods for information dissemination.

Project stage	Information to be publicly disclosed	Methods proposed	Timetable: location & dates	Target stakeholder	Percentage reached	Responsibilities
During the project implementation	About the progress of projects	Notification, Radio spots, leaflets, public meetings, consultations with PAFs	Monthly meetings with PAFs RP(s) and GRM Bi-annual update on project progress	1. PAFs and relevant local Civil Society groups 2. All stakeholder groups		PMU/Social/SEP Focal point and communication specialist

6.4. Citizen Engagement Indicators

Citizen engagement indicator is the means by which the public participation in the extractive industry development can be understood and gauged. The indicators should therefore intelligible and unambiguous and should accurately reflect the extent of citizen engagement in the extractive industry.

The suggested indicators for citizen engagement in the AGASP project are;

- 70% of the project related grievances are timely addressed as described in figure 4.
- In the project-related consultation meetings, 50% of participation is from non-governmental entities such as communities, private sector, Civil Society Organization etc.

6.5. Citizen Satisfaction Survey

Ministry will conduct citizen satisfaction survey to assess the beneficiaries' overall satisfaction and perception on the above citizen engagement program. The survey will be conducted in year 3 and 4 of project implementation.

The key focus areas will include:

- Assessment of GRM functionality
- Satisfaction with information and consultation regarding ESF document

7. Timetable for Disclosure

56. The disclosure process associated with the release of project E&S appraisal documentation, as well as

the accompanying SEP will be implemented within the following timeframe:

- Placement of the ESMF (including ESMP and RF), and SEP in public domain – Dates to be confirmed by AGASP
- day disclosure period – Dates to be confirmed by AGASP
- Public consultation meetings in project affected communities and with other stakeholders to present and discuss findings of the ESMF and measures proposed in the ESMP - Dates to be confirmed by AGASP.
- Addressing stakeholder feedback received on the entire disclosure package - Dates to be confirmed by AGASP.
- Periodical progress report and Third-Party Monitoring report – dates to be confirmed by AGASP.

57. The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

7.1. Proposed strategy for consultation

58. To consult with the stakeholders, the following methods will be used for the consultations:

- Meetings and workshops
- Face-to-face consultations with stakeholders
- Consultations with male/female Community Development Councils (CDCs)-

Table 4- strategy for consultation

Project stage	Topic of consultation	Method used	Timetable: location and dates	Target stakeholder	Responsibilities
Before project implementation stage	<ul style="list-style-type: none"> • ToR for ESIA, ESMP & RP for Sheberghan- Mazar Gas Pipeline and gas processing plant • Stakeholder Engagement Plan (SEP) for AGASP • Environmental and Social Management Framework/Resettlement Framework (ESMF/RF) for AGASP. • Env & Soc Audit (ESA) for gas 	Stakeholder consultation and separate consultation with PAFs	Consultation on ESMF, RF for AGASP with TORs for ESIA were held on 30 – 10 – 2018 At MoMP. UNICON conduct separate meetings with stakeholder, including 8 affected families along	The participants included representatives from NEPA, DAFA; the University of Kabul; MUDL; Kabul Municipality ; National Institute of Social Sciences; AGE (Sheberghan	MoMP with support from consulting firm (ESMF & RF).

	<p>pipeline and amine plant, and an Ex-Post Social Audit (EPSA) for Sheberghan-Mazar Gas Pipeline.</p> <ul style="list-style-type: none"> • Environmental & Social Commitment Plan (ESCP) 		<p>Sheberghan-Mazar pipeline during January 2019.</p> <p>Consultations were conducted with stakeholder (AGE, amine plant, district official and communities) on SEP in the last week of August, 2019.</p>	<p>office) amine plant (existing), Chemtal district office and the affected communities in Qasim Abad- gas pipeline</p>	
Before acquisition of PAFS' land and houses	Notification and information meeting re transition from villages to resettlement site	Meetings with all PAFs from each villages and relevant local Civil Society Groups	In each village –prior to begin census survey and when the baseline social survey is completed. time tbd	PAFs in all affected villages with special consideration for vulnerable and disadvantaged groups	Social Safeguards team (PMU) and communication specialist
During the project implementation	Sharing information on project progress, consult on any specific implementation problems of relevance to public (refer to GRM)	Public meetings, and specific meetings with PAFs and local Civil Society Groups	MoMP, Kabul , organization of semi-annual meetings organized by the PIU/Social/SEP Focal point and communication specialist	PAFs, Line ministries and local government PAFs and local Civil Society Groups Host communities and other relevant governmental and non-governmental interested entities	PIU/Social/SEP Focal point and communication specialist

7.2. Proposed strategy to incorporate the view of vulnerable group

59. The following strategy will be used for consultation with vulnerable groups:
- Issuance of invitations specific to the relevant groups : i) female PAFs; ii) pastoral nomads of the area; iii) displaced PAFs/IDPs, poor and other vulnerable groups.
 - Conduct specific consultations with each of these groups separately in a location and venue easily accessible to them.
 - Consultation with vulnerable people will be conducted throughout the project life. There will be separate FGDs arranged with vulnerable people during project design/SIA preparation stage. At the initial FGD meeting the frequency of future meetings will be agreed. The key focus will be to explore problems and needs of these groups and how to reach them. There will also be regular meetings conducted with these group during project implementation.

7.3. Timelines

60. The time line for major project phases will be defined at a later stage. After each public consultation, there will be a deadline for submission of further comments in writing (on-line, by letter etc) of 1 working week.

7.4. Review of Comments

61. The comments from the Stakeholder engagement process will be gathered (written and oral comments) and reviewed by the PMU Stakeholder Engagement Focal Points whose information and contact details will be shared during the first consultation meetings. The minutes of consultations will be supplemented with any written comments received within the deadline after the consultation.
62. The comments will be entered into a format with official responses to each issue raised. This response, matrix will be shared with the participants by email and put on the MoMP website. The Minutes and response matrix will be available in English and local languages.

8. Estimated budget

63. A tentative budget for implementing the Stakeholder Engagement Plan (SEP) over five years is presented in Table 8. The stakeholder engagement activities featured below cover a variety of environmental, social, including operation, health and safety, land acquisition management issues, which may be part of other project documents, so it is possible that they have also been budgeted in other plans, as well as Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Code of Conduct to be signed by all workers prior to start of works, Influx Management, Worker's Camp Management, STDs, including HIV/Aids awareness of workers and communities. However, the table below summarizes all the stakeholder engagement activities in one place for better coordination and monitoring. MoMP will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly.

Table 6- Stakeholder Engagement Plan - Estimated Budget (5 Years)

Stakeholder engagement Activities	Quantity	Unit cost (USD)	Times/year	Total cost (USD)	Remarks
a) Sheberghan-Mazar Gas Pipeline (SMPL)					
Staff salary (SEP focal point in Sheberghan-Mazar gas pipeline and amine plant)	1	600	1	7200	One male one female-USD 1200/ month
Travel expense for staff		3000	1	3000	
Community meetings along the full length of the gas pipeline				700	
Communication materials (pamphlets, posters-brochures-including design)				1500	7 villages
Training on social/environmental issues AGE, line- ministries	1	2000	1	2000	
GBV Training for relevant staff from AGE, line-ministries and project company.	1	500	1	500	
Citizen satisfaction survey	1	5000	1	5000	To measure the grade of satisfaction on GRM functionality
Stakeholder consultation (workshop)	2	500	1	1000	
Sub-total				20900	
b) Grievance Redress Activities					
Communication materials (GRM pamphlets, posters)	700	0.5	2	700	
Suggestion boxes (in each village and host site)	8	20	1	160	
GRM MIS/Database	1	10000	1	10000	
Training of GRM committees (all three levels- local, provincial & ministry level)	3	200	5	3000	
Sub-total grievance Redress				13860	

Total				241,460	

9. Management functions and Responsibilities

64. MoMP has the overall responsibility for the administration and management of the extractive sector, providing policy / laws / regulations, supervising, monitoring and reporting for regulatory and contractual compliance, and ensuring sector performance to be guided by good international industry practice in Afghanistan. Moreover, while the government retains ownership of the mineral resources, the MoMP has led responsibility to create a predictable, transparent and non-discretionary investment climate for commercial and/or private sector investors to undertake resource development.
65. The PMU has 5 Social and environmental Safeguards staff, all locals. These safeguards staff will take responsibility for and lead all aspects of the stakeholder engagement. However, to implement the various activities envisaged in the SEP, the social safeguards team will need to closely coordinate with other key stakeholders – other national and provincial government departments/agencies, government commission for RP implementation. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

Table 7: Responsibilities of key actors/stakeholders in SEP Implementation

Actor/Stakeholder	Responsibilities
MoMP	<ul style="list-style-type: none"> • Planning and implementation of the SEP; • Leading stakeholder engagement activities; • Management and resolution of grievances; • Coordination/supervision of contractors/mining company on SEP activities; • Supervision/monitoring of RhP and Implementation Consultants; • Monitoring of and reporting on environmental and social performance to MoMP management and the World Bank • GRM
ESIA Consultant/Supervision Engineer for pipeline	<ul style="list-style-type: none"> • Preparation of ESIA and RP for pipeline; •
National Government Agencies - <ul style="list-style-type: none"> • Ministry of MUDL • Government Commission on resettlement plan implementation • NEPA, • MoLSA has mandate to oversee the implementation of Labor 	<ul style="list-style-type: none"> • Land clearance survey and allocation of land to the affected families; • Commission is mainly responsible to implement the directive # 29 & 33 Review and clearance of ESIA & ESMP • Participate in the implementation of some activities in the ESA/ESPA and SEP; • Participate in the implementation of the Land Acquisition process; • GRM

Law and Regulations including the Occupational Health and Safety issues.	
• Provincial Valuation team	• Conduct land valuation

10. AGASP Grievance Redress Mechanism (GRM)

10.1. Introduction

66. The Government of Afghanistan is committed to strengthen functionality of Grievance Redress Mechanism (GRM) for AGASP. A guidance note for grievance handling for AGASP was drafted which gives guidance to the ministry (MoMP), particularly the GRM unit to address grievances relating to project activities. This note also sets out the framework, procedures, roles, functions, deadlines and standard forms to facilitate the due process in effective handling of grievances relating to the AGASP activities.
67. The procedure for the GRM was developed in accordance with established national & international good practices and as well as the procedures set out in the Land Acquisition Law (2018) of the GoIRA. The GRM is an effective tool and it provides avenue to identify issues and areas for further improvement of the project and ensuring transparency and accountability in the fair and equal treatment of all users and the project affected people.

10.2. GRIEVANCE HANDLING FOR MINISTRIES, GAS COMPANIES

68. The ministries and the GRCs are required to comply with the Standards and Procedures outlined below in this section. This section will be strengthened during the life of the project.
69. Principles of the Grievance Procedure
- The affected communities and workers (section 3.12 provide procedures for labors and workplace conditions) have the right to raise their concerns and complaints about the project activities.
 - The affected communities, workers and other stakeholder who raises a grievance will be offered the opportunity to discuss their complaint and their views will be sought on how they would like the matter to be taken forward. They will be kept informed of the progress of the grievance.
 - Decision makers will ensure that decisions are taken objectively, are non-discriminatory and pay due regard to the evidence available and the circumstances of the case.
 - Matters will be dealt with promptly, but with sufficient thoroughness.
 - The complainants will be given explanations of and have the right to appeal against the decision made on their grievance.
 - The outcomes of grievances will be actively managed to assist all concerned to move forward positively.

10.3. The GRC structure for AGASP

70. The GRCs structure for AGASP project has the following levels:

- a) **Local or community level GRC:** members should include: (i) community representatives, labors (ii) grievance focal officer, (iii) contractor/ mining company.
- b) **Project site level GRC (e.g. gas-pipeline and amine plant):** members include: (i) MoMP, (ii) representative of local district governor/provincial governor; (iii) representative of CSO, (iv) Grievance focal officer/PMU; (v) local community/affected people; (vi) representative from Arazi- MUDL; (vii) gas company/contractor, and Expropriating Authority/Technical Panel². In accordance with the law on land acquisition (2018), the Expropriating Authority are municipalities in the scope of urban master plans and ministries and governmental agencies outside the areas of urban master plan with cooperation of the Ministry of Urban Development and Land (MUDL).
- c) **Ministry level GRC:** (i) deputy minister of MoMP (head), (ii) government commission/technical panel (e.g. RAP implementation commission), (iii) Project Director, (iv) Grievance focal officer, (v) community representative.

10.4. Grievance mechanism relating to Land acquisition

71. Grievances related to land acquisition, resettlement and compensation will be managed through the same GRC structure. The Project-site level GRC will include member(s) from the Expropriating Authority/ technical Panel who will attend GRC meeting on regular basis. In accordance with the land acquisition law (2018) – article (34), the expropriating authority/technical panel is authorized to assess the objection/complaints and take appropriate decision in relation to dispute relating to resettlement and compensation. It is essential to notice that there are separate procedures in place for addressing complaints relating to GBV issue (see section “grievance for GBV issues” below).

² Technical Panel for the purpose of pricing of expropriated properties consisting of professional engineers of the Expropriating Authority and owner or representative of owners (article 24 of the LAL (2018)).

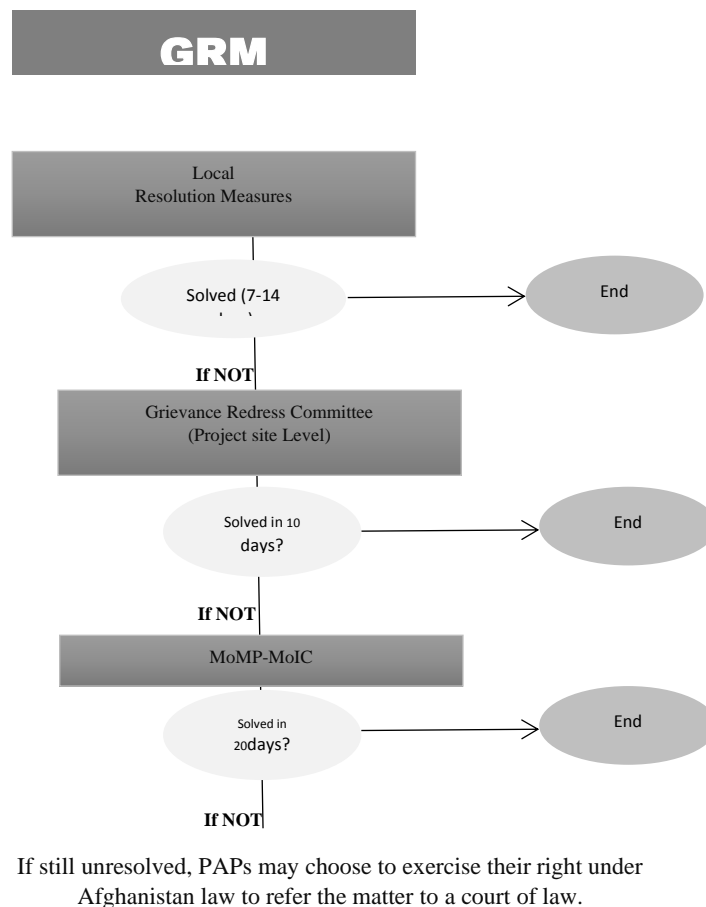
10.5. Grievance Handling Procedure

72. The following table provides steps with responsibilities of grievances relating to the project activities. The key purpose of this exercise is to present GRM process in an effective & user-friendly manner.

Table 2-1 presents GRM procedures for the selected sites under AGASP.

Steps	Complainants	GRC/ GRM Focal Officer functions	Timeframe
Local or community level GRC: <ul style="list-style-type: none"> The Affected Person/complainant (or his/her representative) may submit his/her complaint in several ways e.g. by written letter, phone, SMS messages and email to the GRC or, alternatively, raise his/her voice in a public or individual meeting with project staff. 			
1	Submission of complaint to the local or community level GRC	<ul style="list-style-type: none"> Conduct public information sessions among the affected communities to use grievance service. Registering a grievance in the project logbook and grievance database. Segregate/sort and process Acknowledge and follow up of grievance. Verify investigate, and act Provide written response to the complainants. 	7- 14 days
Project site level GRC: If resolution at local/community level is unsuccessful, the Affected Person (AP) can take his or her complaint to a Project level GRC.			
2	Submission of grievance to the Project level GRC through one of the channels	<ul style="list-style-type: none"> Conduct coordinating meetings among complainants/ public and relevant administrations including, but not limited to; Arazi Department at provincial level. Take legal action against juridical complaints at provincial level. Provide written response to the complainant. Provide written response to the complainant 	10 days
Ministry level GRC:			

In case the complaint is not resolved within 10 days of its receipt or it is unattended, the complainant can approach the ministry level GRC or directly to the Minister- of MoMP in Kabul. Ministry-GRC and/or minister will then examine the complaint and address the complaint within 20 days.			
3	AP can refer the complaint to the ministry GRC or directly to the Minister office of MoMP	<ul style="list-style-type: none"> • Conduct coordinating meetings/ resolution sessions between complainant and relevant administrations at • Investigate the complaints • Provide written response to the complainant 	20



The figure above shows the work flow relating to grievance handling for AGASP.

10.6. Venues to register Grievances - Uptake Channels

73. A complaint can be registered directly at AGASP (GRCs) through any of the following modes and, if necessary, anonymously or through third parties.
- a) By telephone at +93 0744360999
 - b) By e-mail to AGASP.complaints@momp.gov.af By letter to the local or Project site levels GRC
 - c) By letter directly at AGASP-sub office- or contractor/ company office.
 - d) Be letter to the local mining authorities (e.g. ACPA, Sheberghan amine plant), AGE office, local Arazi office-grievance boxes will be located in local offices near a community information board.
 - e) By complaint form to be lodged at any of the address listed above- this form will be made available in the relevant subproject/mining sites area to be used by the complainants and can be filled by the help of AGASP staff available in each sub-project (see Annex 2)
 - f) Walk-ins and registering a complaint on grievance logbook at sub-office or suggestion box at project sub-offices
74. Note: Once a complaint has been received, it should be recorded in the complaints logbook or grievance excel-sheet- grievance database (please see annex 1 on grievance excel-sheet form).

Box 1. Receipt and Registration of complaints

- a) The call center (grievance hotline) serves from 8 AM to 4:30 PM, Saturday- Wednesday. On Thursday the call center serves from 8:00 AM to 1:00 PM.
- b) These services are offered in both Pashtu and Dari.
- c) Anonymous complaints are also accepted, where the identity of the complainants is not necessarily required- particularly complaints at workplace conditions. However, anonymous complaints are not always accepted where specific incidents are investigated, and a complainant's identity can be crucial during the investigation. A complainants' identity may also be required at the conclusion of an investigation of the complainant is needed to testify at an adversarial hearing.

75. All submitted complaints and grievances will be registered at project site level and added to a database in the MoMP which will be updated regularly by designated grievance focal officer. The project encourages the public to submit grievances about the quality of a specific work or services in writing- for example complaints relating to facilities to be provided in the relocation sites. The GRM unit (this unit will be in place by project appraisal) and relevant PMUs' manager's reviews each grievance and deals with it according to the procedures in this guidance note.

10.7. The GRM unit for AGASP

76. Ministry (MoMP has established a dedicated GRM Unit for AGASPt. The GRM unit of the ministry has the GRM Unit Manager and sub-project GRM officer- they will also engage a GRM Analysis Officer in Kabul (ministry level). The GRM unit Manager is already assigned (Mr. Anwar Mr. Mohammad Anwar Nazeri (0744360999) who has already received training and capacity building support.

77. In addition, GRM Focal officers will be assigned for each site:
- a) GRM focal officer for Sheberghan-Mazar gas-pipeline and amine plant- already assigned and needs some training.
 - b) GRM focal officer for Totimaidan gas block.
 - c) GRM focal officer for Yatimtaq gas field.
78. The mining companies/contractors will also assign their GRM focal officers for the respective sites.

10.8. Training of GRM unit staff and GRCs

79. The GRM Unit at the MoMP will received further training in Grievances management, analyzing and reporting system. Given that CCAP and KMDP (the World Bank supported project in Afghanistan) staff have gained relevant experience, the MoMP may want to explore collaborating with these team to provide training/mentoring for MoMP GRM staff. The training is important because MoMP GRM unit would benefit from exchange of lessons and challenges related to handling Grievances. This training will also help the GRM Focal Officers in delivering basic trainings/workshops and awareness to the GRCs – local level and project site level GRCs in the selected sites.

10.9. Screen for Eligibility

80. This step determines whether a complaint is eligible for the grievance mechanism or not. AGASP has developed the following screening procedure for inclusion of complaints by GRCs.

81. Eligible complaints may include those where:

- a) The complaint pertains to the project activities.
- b) The issues raised in the complaint fall within the scope of issues the grievance mechanism is authorized to address
- c) The complainant has standing to file.

82. Ineligible complaints may include those where:

- a) The complaint is clearly not project-related
- b) The nature of the issue is outside the mandate of the grievance mechanism
- c) The complainant has no standing to file
- d) Other procedures (for example MUDL-ARAZI complaint system) are more appropriate to address the issue.

83. If the complaint is rejected, the complainant is informed of the decision and the reasons for the rejection.

10.10. Anticipated Types of Grievances under AGASP

Table 3-1 types of grievances

Type of grievances	Complainant(s)	Examples
Complaints about land/asset disputes, including temporary land impacts, etc.	An individual or family	
Complaints related to local employment and late payment of wages to the labors.	Laborers	For example Sheberghan-Mazar pipeline. the section 3.12 outline procedure for complaints relating to labors and workplace conditions.
Complaints related to resettlement site by relocated families, particularly related to issue such as size and the quality of land allocated, delays in awarding land titles for their new land, poor service and common facilities.	An individual or family	
Complaints in connection to the operations of the contractor works or the mining companies	Individual or local communities	
Obstructions of access to local sites or road	Individual or local communities	
Damage to private property	Individual or local communities	Contractor should compensate affected person/people
Decrease in water level and water pollution and other environmental issue		
Complaints about gender-based violence (GBV)	Laborers, local community & PMU/ministry staff	Complaints may raise related to workplace sexual harassment (WSH) or sexual exploitation and abuse (SEA) issue. These kinds of complaints will refer to the separate GRM system for GBV.

10.11. Grievance for Gender-Based Violence (GBV) issues

84. There will be specific procedures for addressing GBV including confidential reporting with safe and ethical documenting of GBV cases. Multiple channels will be in place for a complainant to lodge a complaint in connection to GBV issue. Specific GRM considerations for addressing GBV under AGASP are:
- a) Since, AGASP is expected to be a project with substantial risk in terms of GBV, consideration should be given to a separate GBV GRM system, potentially run by a GBV Services Provider with feedback to the project GRM, similar to that for parallel GRMs by contractors and mining companies. The GRM operators are to be trained on how to collect GBV cases confidentially and empathetically (with no judgment).
 - b) AGASP will establish multiple complaint channels, and these must be trusted by those who need to use them. Community consultations may be one mechanism to identify effective channels (e.g. local community organizations, health providers, etc.).
 - c) No identifiable information on the survivor should be stored in the GRM logbook or GRM database.
 - d) The GRM should not ask for, or record, information on more than three aspects related to the GBV incident:
 - i. The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - ii. If, to the best of complainant's knowledge, the perpetrator was associated with the project; and,
 - iii. If possible, the age and sex of the survivor.
 - e) The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. This will be possible because a list of service providers will already be available before project work commences as part of the mapping exercise.
 - f) The information in the GRM must be confidential—especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to: (i) refer complainants to the GBV Services Provider; and (ii) record resolution of the complaint.
85. Data Sharing: The GBV Services Provider will have its own case management process which will be used to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV Services Provider should enter into an information sharing protocol with the GRM Operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and that the case is closed. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk for experiencing more violence. For more information on GBV data sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.
86. The GRM should have in place processes to immediately notify both the ministry and the World Bank of any GBV complaints with the consent of the survivor. For World Bank reporting protocol refer to the Safeguards Incident Response Toolkit.

Assess the Grievance

87. During the assessment, the GRCs (local level or the upper levels GRCs) gathers information about the case and key issues and concerns and helps determine whether and how the complaint might be resolved. The table 2-1 above outlines standard operating procedures (SOP) for grievance handling under AGASP.
88. It is essential to note that the Project site-level GRC will include members from the Expropriating Authority/ technical panel (see section 3.3 “structure of GRCs for AGASP” above). The representative(s) of Technical Panel will attend GRC meeting on regular basis, particularly, in case of complaint relating to resettlement and compensation issue. In accordance with the land acquisition law (2018) – article (34), the technical panel is authorized to assess the objection/complaints and take appropriate decision in relation to dispute relating to resettlement and compensation. There are separate procedures in place for addressing complaints relating to GBV issue (see section 3.12 “grievance for GBV issues” above).

10.12. Formulate a Response to complainant

89. The GRM unit who is also responsible for assessment will provide written feedback to the complainant. The PMU manager may participate in feedback, depending upon the seriousness of the complaint.
90. Complainants will receive the final feedback within five working days after the issue is resolved. The resolution will be communicated through one of the following channels:
- a) **Message:** Either an automatic or manual reply will be sent to the complainants confirming the receipt of their complaints and getting back to them after analyzing it.
 - b) **Grievance Feedback Form:** An offline either printed or soft Grievance Feedback Form will be used to report back to complainant through:
 - c) **Email:** The complainant, who has sent his /her grievance through email, will receive the final feedback through email.
 - d) **Call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by relevant personnel.

10.13. Grievance Resolution Approaches

The following approaches will be considered when evaluating what array of resolution approaches to offer:

- a) Ministry – AGASP proposes a solution.
- b) The community and Ministry decide together.
- c) Ministry and community defer to a third party to decide.
- d) Ministry and community utilize traditional or customary practices.

10.14. Grievance Information & Registration

91. The following methods will be used to reaching out to the public to inform them about available grievance mechanism and approaches:

- a) AGASP team will use a range of approaches to engage and inform community members and often take advantage of meetings of CDC members and other stakeholder meetings to present information about the function and use of the grievance mechanism.
 - b) AGASP will conduct public information sessions to inform the affected communities and other stakeholder about the grievance process and report regularly to the public on its implementation, protecting the privacy of individuals.
 - c) Information on ways to make complaints will be readily available to the affected communities and workers- workplace conditions. Leaflets, website links, posters in public places (i.e. Masjids, schools, CDCs center etc), or complaint boxes at public locations are all good ways to make sure that potential complainants can submit their grievances.
 - d) Women and men should have equal access to grievance information.
92. All grievances (submitted to any of the aforementioned grievance uptake channels) should be recorded in a central excel-sheet or grievance database to enable tracking and facilitate the process of reviewing, categorizing and prioritizing grievances, Serious cases, particularly the cases with regards to harassment/discrimination or workplace injuries, etc. should be escalated to the attention of Project Director and/or directly to the attention of Minister of MoMP .

Box 3 - Effective Communication

- ✓ AGASP project conducts public information sessions among the affected communities and at workplace conditions to publicize grievance mechanism to those who may wish to access it. AGASP will also provide adequate assistance for the complainants who may face barriers of access, including language, literacy, distance, or fear of reprisal.
- ✓ AGASP conducts information brochure that should contain entitlement package, eligibility criteria, and to circulate it in the project area
- ✓ AGASP informs all concerned (the complainant and relevant personnel) about the status of the case and progress being made toward resolution.

93. Grievance Documentation and Reporting

- a) All grievances should be documented
- b) Report aggrieved parties/complainants about the developments regarding their grievances and the decision of the project authorities,
- c) Monitor and analyze grievances as well as track response time,
- d) Inform communities within the project area of influence to utilize GRM services.

94. Grievance Audits

95. Since AGASP is a complex project in terms of land acquisition and resettlement impacts and other social aspects, the ministry will engage an independent monitoring to conduct periodic external audits of the grievance management system as part of its monitoring activities. Such audits would typically include:

- a) A review of lodging, tracking and documentation systems including acknowledgement of receipts and resolution agreements.
- b) A check that deadlines and timeframes committed on by the client are generally met.
- c) A check that potentially affected people, workers and other stakeholders are generally aware of the avenues available to lodge a grievance.
- d) A check of the variations in time of the number of open and closed grievances
- e) A check on a sample of grievances of:
 - i. how resolution responsibility is assigned
 - ii. complainant satisfaction with the process (timely, fair)
 - iii. evidence that “closed” grievances have been closed following satisfactory due process
 - iv. complainant satisfaction with the outcomes

10.15. GRIEVANCE SUBMISSION FOR LOCAL COMMUNITIES & AFS

96. Key Notes on Grievance Submission

- a) The complainants should register their complaints with Local GRC first. The complaints registered through Local Level GRC in the grievance logbook and Project site level GRCs will flow to the central grievance excel-sheet or grievance database at MoMP in Kabul.
- b) All grievances will be registered into the central excel-sheet or grievance database to enable grievance tracking and review -GRM Focal Officer will be responsible to register grievance into the grievance logbook and central database.
- c) The GRC (Project site level) is required to examine the complaint and attend to it within two weeks by responding to the complainant.
- d) The action taken on the complaint has to be updated by the GRM unit in the central excel-sheet at MoMP.
- e) The status of the complaint and the description of action taken will be regularly checked/monitored by AGASP- Project Director and the WB- AGASP team.
- f) In case the complainant is not satisfied with the resolution of the GRC (sub-project level), s/he may approach the Project site level GRC or ministry level GRC- or directly the Minister of MoMP.

How to submit a complaint form?

97. There are a variety of channels to submit complaints:

- a) The complaints might be submitted to the village elders/CDC, the district or provincial representative to whom the community people might have ease of access.
- b) Complaints can be submitted directly via the hot line (phone number to Complaint handling Unit at MoMP). The complainant can use the following channels/locations to submit grievances relating to AGASP:
 - i. **Complaint registration for Sheberghan-Mazar pipeline**
 - o AGE has appointed GRM focal officer for Sheberghan-Mazar pipeline site (Mohammad Ayoub Naivand- phone: 0779479191- email: eng.ayoubpipline@gmail.com) who is responsible to register all grievances in the local grievance logbook.

- c) Complaints can also be submitted to ministry officials directly on week days during office hours- or to through email (AGASP.omplaints@momp.gov.af).
- d) At the first stage, signature or finger print should be taken on the form from the person complaining.
- e) All complaints received through any of the above channels/uptake points will be registered in the central database, with name, address of complainant, issue, location and date – and details of receipt of complaint.
- f) The GRM unit will acknowledge the receipt of complaints and register them into central database and central excel-sheet. There may be complaints that might be solved before reaching to the GRC meetings. The complaint form and details of the case solved will be recorded and maintained for future uses.
- g) The grievance focal officers have the responsibility to provide complaint registration form and the register book. They should also assist the complainants in filling of the form. They will also inform complainant about the timeframe in which a response can be expected.

10.16. Monitoring and Reporting

Involvement of stakeholders in monitoring activities

- 98. The Third Party Monitoring will among other methods also employ techniques of consultations and Focus Group Discussions with PAFs and host communities in resettlement sites.
- 99. The ongoing stakeholder engagement throughout the duration of the project will also be a channel for inclusion of stakeholder's ongoing reflections and informal monitoring of project activities.

7.2 Reporting back to stakeholder groups:

- 100. The scheduled, regular stakeholder consultations throughout the duration of the project will ensure that stakeholders will be informed about important details on the undertakings, routines, status, and progress of the project team and the project progress. As described above, minutes of these meetings along with a matrix of comments and responses/commitments will be prepared and disseminated. Keeping track of the many commitments made to various stakeholder groups at various times, and communicating progress made against these commitments on a regular basis, will be part of the agenda for the subsequent Stakeholder Engagement meetings.