

**Gas Sector Efficiency Improvement and Decarbonization Project (P179009)**

**[Installation of 11 Lac Pre-paid Gas Meters for TGTDCCL]**

**Stakeholder Engagement Plan (SEP)**

**Bangladesh**

**Implemented by:**



**Titas Gas Transmission & Distribution Company Limited**

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## Acronyms

EMRD	Energy and Mineral Resources Division
EPC	Engineering, Procurement and Construction
ERD	Economic Resources Division
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
GoB	Government of Bangladesh
GSEID	Gas Sector Efficiency Improvement and Decarbonization
IMED	Implementation Monitoring and Evaluation Division
MPEMR	Ministry of Power, Energy and Mineral Resources
Petrobangla	Bangladesh Oil, Gas and Mineral Corporation
PIU	Project Implementation Unit
PSC	Project Steering Committee
SEP	Stakeholder Engagement Plan
TGTDCL	Titas Gas Transmission & Distribution Company Limited
TFA	Titas Franchise Area
ToR	Terms of Reference
WB	World Bank

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## 1. Introduction and Project Description

### 1.1 Introduction

1. Stakeholder's engagement and communication are important tool to ensure transparency, accountability and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with Gas Sector Efficiency Improvement and Decarbonization (GSEID) Project. This Stakeholder Engagement Plan (SEP) is prepared by Titas Gas Transmission & Distribution Company Limited (TGTDC), a company of Bangladesh Oil, Gas and Mineral Corporation (Petrobangla) under the Energy and Mineral Resources Division (EMRD)/Ministry of Power, Energy and Mineral Resources (MPEMR), Government of Bangladesh (GoB). This SEP covers TGTDC's activities under component one of this project which are installation of 1.1 million of prepaid meters for the residential households and few meters will be installed at industrial level as pilot. A separate SEP is prepared by PGCL for the prepaid meter installation and installation of Supervisory Control and Data Acquisition (SCADA) activities.
2. The COVID-19 pandemic has led to a dramatic loss of human life worldwide and presents an unprecedented challenge to public health. Given the COVID-19 pandemic situation (and depending on further outbreaks), public consultation and stakeholder engagement management in the project will be conducted in compliance with national requirements and any updated guidance issued by WHO and the World Bank.
3. The project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
4. The SEP is intended to support the Project in delivering efficient and effective engagement and communication with stakeholders of the investment program so that their views and concerns are reflected in the project, and they are fully informed about the project activities. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals. However, due to the current COVID-19 pandemic and uncertainty over how long it will last, overall stakeholder engagement methods and labor management have to be revised to incorporate adequate safety measures.
5. The SEP outlines in detail the commitment of TGTDC as regards to engaging the stakeholders of the GSEID project. It also details the project Grievance Redress Mechanism (GRM) and future plan of action, keeping in mind the COVID-19 context, as a measure to engage with the stakeholders and to resolve any potential cases of grievances arising out of implementation of the project.

### 1.2 Project Description

6. Ensuring effective utilization of natural gas is one of the key policies of the Government of the People's Republic of Bangladesh to address future energy crisis. Natural gas wastage is a common occurrence for domestic and industrial customers which has been prevalent for a long time. Bangladesh needs efficient natural gas supply to keep its development activities in pace. Though this country has its own natural resource of natural gas, it is struggling to meet the growing demand due to the depletion of the natural gas reserve. At present, there are about 28 lac domestic customers in the Titas Franchise Area (TFA). Among them, a total of 3,33,100 card-based prepaid meters under the ADB financed project (8,600) and JICA financed project (3,20,000) have

been installed in different areas of Dhaka city. As such, about 25 lac domestic customers are still non-metered. As a result, they pay a certain amount of bill as per the government tariff rate regardless of their gas consumption. It is not possible to properly measure and bill the amount of gas consumed by consumers for drying clothes, keeping the house warm during winter and saving the cost of match sticks as they are non-metered. Furthermore, there is a prevalence of gas theft due to individuals using gas on unauthorized equipment. This type of gas wastage can be seen in densely populated areas. This is an important cause of natural gas wastage and system loss. In this case, the use of prepaid meters with efficient management of gas can prevent gas wastage in the domestic sector, reduce system losses and save energy which will play an important role in national energy security and have a positive impact on the environment.

7. From experience, it is seen that due to leakage in the internal GI line of a non-metered domestic customer, a large amount of gas is wasted which the customer is not aware of and the company is not informed about. If the pre-paid gas meters are installed at the domestic level of TGTDC's affiliated area, then the customer will have to bear the cost of gas leakage from the internal GI line and hence, and thus will be cognizant of instances of leakages and take immediate action. As a result, it will be possible to prevent a huge wastage of gas and the efficient utilization of gas will help Bangladesh achieve its Sustainable Development Goals. Furthermore, it will be possible to prevent unwanted accidents by ensuring overall safety. The implementation of the project will increase the awareness of the customers about the use of gas, increase the management efficiency of the company and reduce the monitoring cost.
8. Increasing awareness to prevent gas wastage among a large number of domestic customers can reduce the system loss of distribution companies as well as ensure proper utilization of limited and valuable natural resources. In order to increase energy efficiency and ensure optimal use of gas, domestic customers need to be brought under a prepaid metering system to provide affordable, reliable, and sustainable energy for all. In this context, a project entitled "Installation of 11 Lac Prepaid Gas Meters for TGTDC" has been proposed for TGTDC's domestic customers.

### 1.3 Project Objectives

9. The project entitled "Installation of 11 Lac Prepaid Gas Meters for TGTDC" aims to:
  - Prevent gas wastage at the domestic level in Dhaka metropolitan area.
  - Make significant environmental contribution to conservation of non-renewable natural gas.
  - Reduce system loss.
  - Contribute to sustainable economic growth of Bangladesh through advance bill collection.
  - Increase customer awareness about gas consumption by using prepaid gas meters at the domestic level.
  - Increase company management efficiency and reduce monitoring costs
  - Bring 11 lac domestic customers in different areas of Dhaka Metropolitan Area under prepaid gas metering system.
10. The project is economically and nationally instrumental as it is a significant step in ensuring efficient use of energy in the domestic sector. The implementation of the project will create opportunities for the company to collect advance revenue and increase the quality of customer

service. If the project is implemented successfully, the professional skills of the manpower working in the project cell and related departments will be enhanced and this skill will play a supportive role in the implementation of large-scale projects in the future. This will create employment opportunities as well as a positive socio-economic impact.

#### 1.4 Project Components

11. The “Gas Sector Efficiency Improvement and Decarbonization Project” comprises the following components. This SEP is prepared based on the TGTDCCL’s activities under component 1. However, Petrobangla will also follow this SEP to the activities under Component 2: Technical assistance (TA) for the decarbonization of the oil and gas value chain.
12. **Component 1:** Strengthening the gas sector monitoring and control capabilities downstream- This component will enhance the efficiency of the gas distribution network and end-use through metering systems for residential and industrial consumers and up to 1,100,000 and 128,000 prepaid meters would be installed respectively by Titas in the greater Dhaka area and PGCL in its service territory. Under this component, meters connections will be provided to a selected number of Titas’ and PGCL’s industrial customers as pilot to demonstrate the viability of smart meters for better management of gas usage by industrial customers and improved monitoring of gas use. Supervisory Control and Data Acquisition (SCADA) system will be installed for PGCL to monitor real time pressure and flows. This component will reduce the wastage of natural gas by domestic end users and contribute to sustainable economic growth of Bangladesh through efficient supply & consumption of natural gas.

#### 1.5 Project Location

13. Under this project, 11 lac prepaid gas meters will be installed by selecting 11 lac customers from all non-metered domestic customers in Titas Franchise Area which is greater Dhaka. The map below shows the overall Franchise area of TGTDCCL, and the overall project area is greater. The meter installation will cover approximately 40 to 50% of the areas and the exact areas are unknown at this stage.





*Figure 1: Project Location (Titas Franchise Area)*

### **1.6 Summary of potential social and environmental risks and impacts of the projects**

14. The project work would involve Installation of 11 lac Prepaid Gas Meters and likely risks are as follows

#### **15. Environmental Risks and Impacts**

- There may be environmental pollution due to some leakages of natural gas during implementation & commissioning period of prepaid gas meters & SCADA system. But the amount of gas leakage is negligible.
- GI line modification works of domestic customers would create some dust and noise pollution.
- Labor and Construction workers will also generate solid waste that would also endanger the surrounding environment.

#### **16. Social Risks and Impacts**

- Gas supply may be interrupted for the residential and industrial customers at times during implementation & commissioning period of prepaid gas meters. However, this can be mitigated through advance notice to the residential households and industrial entities.
- Customer may have to bear the cost of prepaid gas meter.
- Community health and safety concerns such as incidents and accidents associated with gas connections, SEA/SH and COVID-19, etc.

#### **17. Potential social benefits and opportunities of the program**

- Gas will be consumed more efficiently as customers will pay for what they consume.
- Gas wastage will be reduced.
- The local Labor force will be employed for the construction works.
- The project will induce improved management efficiency, efficient use of gas, reduced monitoring costs and positive environmental impacts.
- A stable gas supply system, data collection & storage, secure, efficient and effective gas distribution system to the TGTDCCL customers will be established.

### **1.7 Objectives of the Stakeholder Engagement Plan (SEP)**

18. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between the project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally

appropriate, and adaptive awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

**19. The SEP:**

- ✓ Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project.
  - ✓ Begins early during the project planning process to gather initial views of various stakeholder groups on the project proposal and design.
  - ✓ Encourages stakeholder feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
  - ✓ Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.
  - ✓ Considers and responds to feedback.
  - ✓ Supports active and inclusive engagement with project affected parties/ project beneficiary group mainly the residential and industrial customers,
  - ✓ Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.
20. In addition, the SEP of the proposed project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

**1.8 World Bank requirements for stakeholder engagement**

21. The project is being prepared under the World Bank’s Environment and Social Framework (ESF). The 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”. ESS 10 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.
22. As defined by the ESF and ESS 10, 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. According to ESS 10, Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project. TGTDCCL will ensure the following engagement procedures:

- TGTDCI will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
  - TGTDCI will engage in meaningful consultations with all stakeholders and will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
  - The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultations with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
  - TGTDCI will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
23. TGTDCI has prepared this draft SEP based on the nature and scale of the project and its potential risks and impacts. Stakeholders have been identified and if any new stakeholders are identified during project preparation and implementation, the SEP will be updated to include them. This SEP will be disclosed for public review and comment before the project is placed for the World Bank appraisal. According to ESS10, this SEP has also developed 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 together with components related activities other than safeguard matters and to have those concerns addressed in a timely manner.

## **2. Stakeholder identification and analysis**

24. Project stakeholders are defined as individuals, groups or other entities who:
- ✓ Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
  - ✓ 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.
25. Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local norms and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison links between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. With community gatherings limited or forbidden under COVID-19, it may mean that the stakeholder identification will be on a much

more individual basis, requiring different media (e.g. phone calls, virtual meetings, emails, radio, social media) to reach affected individuals.

26. The stakeholders that are likely to be associated with the project interventions are depicted in the following table:

*Table 1 : Potential Stakeholders Group and Interested Parties*

<b>Name of the Stake Holder</b>	<b>Influence</b>	<b>Interest (High, Moderate, Low)</b>	<b>Engagement Strategy</b>
Energy, Mineral Resources Division (EMRD)	Controlling authority	High	Kept informed
ERD, Ministry of Finance	Providing fund approval and allocation.	High	Kept informed
Petrobangla	Supervising authority	Moderate	Kept informed
Customer	Influence on accepting prepaid meter installation	High	Regular communication
Contractor	Influence on timely & successful implementation of the project	High	Manage closely
Consultant	Influence on timely & successful implementation of the project.	High	Manage closely
Commercial Bank	Influence on L/C related activities.	Low	Manage closely
C&F Agent	Influence on clearing and forwarding imported meters with accessories.	Low	Manage closely
PSI Agent	Influence on inspecting imported meters with accessories.	Low	Manage closely
Media	Influence on motivating customers to take prepaid meter and can act as a watchdog for the project activities.	Moderate	Regular communication

## 2.1 Methodology

27. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

28. **Transparency and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out in a transparent manner, free of external manipulation,

- interference, coercion or intimidation. Additional stakeholders will be identified throughout the project cycle and based on the newly identified stakeholders; the SEP will be updated, if required;
29. **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, and for analyzing and addressing comments and concerns;
  30. **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to include vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.
  31. **Flexibility:** If social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication.

## 2.2 Stakeholder Categorization

32. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:
33. **Affected Parties:** Persons, groups and other entities within the Project Area of Influence (PAI) that are directly 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;
34. **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
35. **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project impacts as compared with any other groups due to their vulnerable status, which may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
36. Engagement with all identified stakeholders will help ensure their valuable feedback, and allow for a successful implementation of the project through the contribution of their expertise, networks and agendas. Access to the local knowledge and experience through the active involvement of stakeholders is crucial for the success of the project.

### 2.2.1 Affected parties

37. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project during the installation of the pre-paid gas meters. Specifically, the following individuals and groups fall within this category:
  - ✓ Domestic and industrial customers.
  - ✓ Communities in the vicinity of the project's planned activities.
  - ✓ The local population and local communes

- ✓ Residents, business entities, and individual entrepreneurs in the project area that can benefit from the employment, training and business opportunities
- ✓ Government officials, including Municipal Administration in the project area, village administrations, environmental protection authorities
- ✓ Consultant
- ✓ Contractor

### 2.2.2 Other interested parties

38. The projects' stakeholders also include parties other than the directly affected communities, including:

- ✓ Business owners and providers of services, goods and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future
- ✓ Government of Bangladesh – government officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities
- ✓ Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.
- ✓ Civil society groups and NGOs on the regional, national and local levels, which pursue environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's Direct Area of Influence.
- ✓ Design & Supervision Consultant.
- ✓ EPC Contractors who will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
- ✓ Local Labor involved during project implementation stage.
- ✓ Bank involved in providing the credit transfer facilities by apps/other system in smart prepaid metering system.
- ✓ Internet Provider/Network Operators (Mobile Operators/ BTCL/others) who will provide data transfer system for SCADA/GIS/Prepaid meter and credit transfer system in case of sim based smart prepaid metering system.

Other interested parties	Interest in the project
<b>International Level</b>	
Environmental and societal NGOs	They may have concerns of the project's impact on the environment and society and may want to voice their opinion of the range of risks and opportunities associated with the project(s).
Academics and researchers	They may have professional knowledge of the impacts of the project, which they can discuss with the implementing agency for the betterment of the project and society.
Training service providers	They would provide the training and skill development programs for employees.
EPC Contractors	They shall will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
<b>National Level</b>	

<b>Other interested parties</b>	<b>Interest in the project</b>
Training service providers	They would be providing the training and skill development programs for employees.
Environmental and societal NGOs	They may have concerns of the project's impact on the environment and society and may want to voice their opinion of the range of risks and opportunities associated with the project(s).
Mass media	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.
EPC Contractors	They will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
Design & Supervision Consultant.	Shall be recruited to provide to monitor overall project management and supervision including procurement, design, contract management & reporting of safeguards aspects such as ESCoPs, LMP, SEP etc.
Bank	They would provide the credit transfer facilities by apps/other system in smart prepaid metering system.
Internet Provider/Network Operators (Mobile Operators/ BTCL/others)	-They would provide the data transfer system as well as credit transfer in case of sim based smart prepaid metering system. - They would provide the data transfer system in SCADA & GIS System.

### 2.2.3 Disadvantaged/vulnerable individuals or groups

39. Project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or do not understand the impacts of a project. The project will ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups are being done, especially those with particular sensitivities (especially cultural or ethnic), and concerns to ensure a full understanding of project activities and benefits. The vulnerability may stem from a person's origin, gender, age, health condition, economic hardships and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with 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.

40. Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- ✓ Individuals with physical and mental disabilities
- ✓ Physically disabled or elderly persons who are not technologically competent.
- ✓ Low-income family's dependent on government support.
- ✓ Minorities living remotely and families with low incomes who may have connectivity issues
- ✓ Women and children who may have lower access to technology
- ✓ Women, Elderly, illiterate & disabled peoples will be affected by the project as they may face difficulties to recharge credit & use other associated functions of prepaid gas meter.

- ✓ Patients, elderly Persons and individuals with physical and mental disabilities

41. Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate.

### **3. Stakeholder Engagement Program**

#### **3.1 Summary of stakeholder engagement done during project preparation**

42. During preparation, consultation meetings were conducted under ongoing pre-paid meter related projects under ADB (8,600 meters) and JICA (3,20,000 meters). Participants included customers, EMRD, ERD (Ministry of Finance), Petrobangla, TGTDC Management, PMU and Finance Division of TGTDC. TGTDC has conducted two consultation meetings with different residential and industrial customers on the gas meter installation on 5 September 2022 at TGTDC office and discussed issues and outcomes of the consultation meeting

- ✓ All the residential and industrial customers are in favor of the project
- ✓ Residential and industrial customers requested to inform them one week before the meter connection
- ✓ Residential and industrial customers requested training on meter handling
- ✓ Customers requested to install the meters carefully so that installation does not affect the structure
- ✓ the benefits of the prepaid meter,
- ✓ the cost involvement for their (customer) end,
- ✓ the nos. of prepaid meter requirement in case of multiple burner user,
- ✓ monthly charge for meter,
- ✓ the charging procedure of prepaid card,
- ✓ availability of vending station for charging,
- ✓ the bill involvement in case of nonuse of burner for a time period,
- ✓ the maximum and minimum amount of charging,
- ✓ the validity of a card,
- ✓ the arrangement of emergency balance in the meter,
- ✓ the service for replacement of meter and
- ✓ prepaid card in case of damages or nonoperational of meter/card etc.

43.

44. The instruments were disclosed through:

Overall project objectives, scope of work, draft SEP was disclosed among the stakeholders through

- ✓ Formal and informal communication with stakeholders and relevant organization
- ✓ Interview meetings with stakeholders and relevant organization
- ✓ Surveys and questionnaires
- ✓ Customer site visits

45. Feedback received during the consultations was to install additional 11 lac prepaid gas meters among the remaining non-metered domestic gas customers in TFA. Hence, consultations help to reduce waste of gas by raising the awareness of domestic customers in the region of using gas more efficiently. The feedback was taken into account by the TGTDC Management.



### 3.2 Summary COVID-19 needs, methods, tools and techniques for stakeholder engagement

46. A precautionary approach will be taken in the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation:

- ✓ Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings.
- ✓ If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings, deploying adequate safety measures such as masks, social distancing and sanitization. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels.
- ✓ Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders.
- ✓ Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders and allow them to provide their feedback and suggestions.
- ✓ Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators.
- ✓ Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

47. In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

- ✓ Focus Group Meetings/Discussions.
- ✓ Community consultations.
- ✓ Formal meetings.
- ✓ One-on-one interviews
- ✓ Site visits.
- ✓ During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged
- ✓ Workshop with experts.
- ✓ Surveys, polls etc.
- ✓ Interviewing stakeholders and relevant organizations
- ✓ Mass/social media communication (as needed)

- ✓ Disclosure of written information: brochures, posters, flyers, website  
Information boards or desks at various sites where project work is ongoing.
- ✓ Grievance redress mechanism
- ✓ TGTDCCL website

### 3.3. Proposed strategy for information disclosure

*Table 2: Proposed strategy for information disclosure*

<b>Target stakeholders</b>	<b>Project stage</b>	<b>List of information to be disclosed</b>	<b>Methods and timing proposed</b>
Customers	Project Preparation (Site Survey)	<ul style="list-style-type: none"> <li>• Benefits of pre-paid metering system</li> <li>• Drawbacks of non-prepaid metering system</li> </ul>	<ul style="list-style-type: none"> <li>• Leaflets</li> <li>• Brochures</li> <li>• Website</li> <li>• Newspapers</li> </ul>
ERD, Ministry of Finance	<ul style="list-style-type: none"> <li>• Project Preparation</li> <li>• Project Implementation</li> </ul>	<ul style="list-style-type: none"> <li>• PDPP</li> <li>• DPP</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Meetings</li> </ul>
EMRD	<ul style="list-style-type: none"> <li>• Project Preparation</li> <li>• Project Implementation</li> <li>• After Project Completion</li> </ul>	<ul style="list-style-type: none"> <li>• PDPP</li> <li>• DPP</li> <li>• Monthly Report</li> <li>• Quarterly Report</li> <li>• Annually Report</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Monthly Coordination Meetings</li> </ul>
Petrobangla	<ul style="list-style-type: none"> <li>• Project Preparation</li> <li>• Project Implementation</li> <li>• After Project Completion</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly Report</li> <li>• Quarterly Report</li> <li>• Annually Report</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Meetings</li> </ul>
IMED	<ul style="list-style-type: none"> <li>• Project Preparation</li> <li>• Project Implementation</li> <li>• After Project Completion</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly Report</li> <li>• Quarterly Report</li> <li>• Annually Report</li> <li>• Project Completion Report</li> <li>• In-depth evaluation report</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Meetings</li> </ul>
PSC	<ul style="list-style-type: none"> <li>• Project Preparation</li> <li>• Project Implementation</li> <li>• After Project Completion</li> </ul>	<ul style="list-style-type: none"> <li>• Working Paper</li> <li>• Meeting Minutes</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Quarterly Meetings</li> </ul>
Consultant	Project Implementation	<ul style="list-style-type: none"> <li>• ToR</li> <li>• Customer Database</li> <li>• Written permission for access to customer site.</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Meetings</li> </ul>
Contractor	Project Implementation	<ul style="list-style-type: none"> <li>• ToR</li> <li>• Customer Database</li> <li>• Written permission for access to customer site.</li> </ul>	<ul style="list-style-type: none"> <li>• Official communication through letters and e-mails.</li> <li>• Formal Meetings</li> </ul>

48. The current website (www.titasgas.org.bd) is being used to disclose project documents, including those on environmental and social performance in both Bengali and English. TGTDCCL will create a new webpage on the Project. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the TGTDCCL’s website. An easy-to understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website. Contact details of the Outreach Team will also be made available on the website. TGTDCCL will update and maintain the website regularly (at least on quarterly basis).

### 3.4 Stakeholder engagement plan

Table 3 : Stakeholder engagement plan

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders
STAGE 1: PROJECT PREPARATION (PROJECT DESIGN, SCOPING, E&S DOCUMENTATION)	<ul style="list-style-type: none"> <li>- Project scope and rationale</li> <li>- LMP, SEP disclosures</li> <li>- Project E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Project SEA/SH risks</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- Public meetings, separate meetings for women and vulnerable in post covid-19 situation.</li> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meeting in post covid-19 situation.</li> <li>- Mass/social media communication (as needed).</li> <li>- Disclosure of written information: brochures, posters, flyers, website.</li> <li>- Information boards or desks in project areas.</li> <li>- Grievance mechanism.</li> <li>- TGTDCCL website.</li> </ul>	<p><b>Project Affected People:</b></p> <ul style="list-style-type: none"> <li>- TGTDCCL Domestic and industrial Customers in Project Areas.</li> <li>- PDB, Industrial, Captive &amp; Commercial Customers of TGTDCCL in Project Areas.</li> <li>- Vulnerable Customers in project areas (Elder/disable/illiterate/Poor).</li> <li>- Local administration.</li> <li>- Local leadership.</li> </ul>
	<ul style="list-style-type: none"> <li>- Project scope, rationale and E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Project SEA/SH risks</li> <li>- LMP, SEP disclosures</li> <li>- Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Meetings, trainings/workshops</li> <li>- Mass/social media communication</li> <li>- Disclosure of written information: Brochures, posters, flyers, website</li> <li>- Information boards or desks in project area.</li> <li>- Grievance mechanism</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> <li>- Bank</li> <li>- Network Operators/Internet Provider.</li> <li>- Academic institutions.</li> <li>- National Government Ministries</li> <li>- Government Departments.</li> </ul>

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders
	<ul style="list-style-type: none"> <li>- Legal compliance issues</li> <li>- Project information scope and rationale and E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Coordination activities</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post covid-19 situation.</li> <li>- Invitations to public/community meetings</li> <li>- Submission of required reports</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Other Government Department including DoE from whom permissions/clearances required;</li> <li>- Petrobangla.</li> <li>- Other project developers, donors</li> </ul>
	<ul style="list-style-type: none"> <li>- Project information: scope and rationale and E&amp;S principles</li> <li>- Training requirements and other management plans</li> <li>- Grievance mechanism process</li> <li>- E&amp;S requirements</li> <li>- Feedback on consultant/contractor reports</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post covid-19 situation.</li> <li>- Trainings/workshops</li> <li>- Invitations to public/community meetings</li> </ul>	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>-Other TGTDC staffs</li> <li>-Design &amp; supervision Consultants.</li> <li>-TGTDC Enlisted Contractors.</li> <li>- EPC Contractors, sub-contractors.</li> </ul>
<b>STAGE 2: CONSTRUCTION AND MOBILIZATION ACTIVITIES</b>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- Health and safety impacts (community H&amp;S, community concerns</li> <li>- Project status</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID 19 period digital/IT based interactions/ FGD in small groups through VTC/ other means to be arranged</li> <li>-Project’s designated staff to conduct visits with a specified periodicity. However, there would be restrictions in reaching COVID-19 affected households.</li> <li>- Public meetings, workshops</li> <li>-Separate meetings as needed for women and vulnerable in post COVID -19 situation</li> <li>-Disclosure of written information: brochures, posters, flyers in Bangla,</li> <li>-TGTDC website</li> <li>-Notice board(s) at construction sites (Bangla)</li> </ul>	<p><b>Project Affected People</b></p> <ul style="list-style-type: none"> <li>- TGTDC Domestic and industrial Customers in Project Areas.</li> <li>- Vulnerable Customers of project areas.</li> <li>- PDB, CNG, Industrial, Captive &amp; Commercial Customers of TGTDC project areas.</li> </ul>
	<ul style="list-style-type: none"> <li>- Project information - scope and rationale and E&amp;S principles</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> </ul>

<b>Stage</b>	<b>Topic(s) of engagement</b>	<b>Method(s) used</b>	<b>Target stakeholders</b>
	<ul style="list-style-type: none"> <li>- Project status</li> <li>- Health and safety impacts</li> <li>- Employment opportunities</li> <li>- Environmental concerns</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>groups through VTC/other means to be arranged.</li> <li>- Meetings, trainings/workshops</li> <li>- Mass/social media communication</li> <li>- Disclosure of written information: Brochures, posters, flyers, website</li> <li>- Information boards or desks in project area.</li> <li>- Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- Bank</li> <li>- Network Operators/Internet Provider.</li> <li>- Academic institutions.</li> <li>- National Government Ministries</li> <li>- Government Departments.</li> </ul>
	<ul style="list-style-type: none"> <li>- Legal compliance issues</li> <li>- Coordination activities</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings.</li> <li>- Invitations to public/community meetings</li> <li>- Submission of required reports</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Petrobangla.</li> <li>- Other project developers, donors.</li> </ul>
	<ul style="list-style-type: none"> <li>- Project information: scope and rationale and E&amp;S principles</li> <li>- Training on E&amp;S requirements and other sub-management plans</li> <li>- Worker grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post COVID situation.</li> <li>- Trainings/workshops</li> <li>- Invitations to public/community meetings</li> <li>-</li> </ul>	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>-Other TGTDCCL staffs</li> <li>-Design &amp; supervision Consultants.</li> <li>-TGTDCCL Enlisted Contractors.</li> <li>- EPC Contractors, sub-contractors.</li> <li>-Local Labor</li> <li>-Local vendors/credit operators.</li> </ul>
<b>STAGE 3: OPERATION &amp; MAINTENANCE</b>	<ul style="list-style-type: none"> <li>- Satisfaction with engagement activities and GRM</li> <li>- Grievance mechanism process</li> <li>- Damage claim process</li> </ul>	<ul style="list-style-type: none"> <li>- Outreach to individual PAPs</li> <li>- TGTDCCL website</li> <li>- Grievance mechanism</li> </ul>	<p><b>Project Affected People:</b></p> <ul style="list-style-type: none"> <li>- TGTDCCL Domestic Customers of Project Areas.</li> <li>- CNG, Industrial, Captive &amp; Commercial Customers of Project areas.</li> <li>- Vulnerable Customers.</li> </ul>
	<ul style="list-style-type: none"> <li>- Grievance mechanism process</li> <li>- Issues of concern</li> <li>- Status and compliance reports</li> </ul>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- TGTDCCL website</li> <li>- Face-to-face meetings in post covid situation.</li> <li>- Submission of reports as required</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> <li>- Bank</li> <li>- Network Operators/Internet Providers</li> <li>- Academic institutions</li> <li>- National Government Ministries</li> <li>-Petrobangla.</li> </ul>

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders
	<ul style="list-style-type: none"> <li>- Grievance mechanism process</li> <li>- Issues of concern</li> </ul>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- TGTDCCL website</li> <li>- Face-to-face meetings in post covid Situation</li> <li>- Submission of reports as required</li> </ul>	<b>Other Interested Parties (Internal)</b> -Design & supervision Consultants. -TGTDCCL Enlisted 11 category Contractors. - EPC Contractors, sub-contractors -Local vendors/credit operators.

### 3.5. Proposed strategy to incorporate the view of vulnerable groups

49. The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information, medical facilities and services and other challenges they face at home, at workplaces and in their communities. The details of strategies that will be adopted to effectively engage and communicate to vulnerable group will be considered during project implementation.

Table 4: Vulnerable Group and Proposed strategy

Component	Target Group	Strategy
Installation of Prepaid Gas Meters	Customers with disabilities, women, ethnic minorities, illiterate and the elderly.	<ul style="list-style-type: none"> <li>• Separate, targeted consultations for the vulnerable group (e.g. women-only groups with female consultant).</li> <li>• Special demonstration for the vulnerable groups to educate them on the process of recharging &amp; gas volume checking of prepaid gas meter.</li> <li>• Prepaid meter operational manual will be translated in Bangla.</li> </ul>
	Financially weak Customers	<ul style="list-style-type: none"> <li>• Cost of installed meters of all customers will be charged as monthly rent.</li> <li>• The new pre-paid meter system will be less costly compared to the flat fee being paid earlier.</li> </ul>

### 3.6. Reporting back to stakeholders and closing the feedback loop

50. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance redress mechanism.

**51. Review of Comments:** The comments will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:

- ✓ Comments received from stakeholders orally or in the written form at the project level;
  - ✓ Responsible officer would summarize the comments and inform the Project Director (PD)
- ;

- ✓ The Social Specialist on behalf of PD would respond to the comments by oral or written means at the project level (If the comments are in the written form, then the answer will be also in the written form)
- ✓ The PD may also himself organize the meeting with respective stakeholders
- ✓ If it is not addressed by PD, then it will be addressed by GM (Admin) of TGTDCCL.
- ✓ If it is not addressed by GM (Admin), it will come to TGTDCCL Executive level.
- ✓ The Responsible Officer will share the summary of the comments to stakeholders on every level.
- ✓ A written record of all these will be kept, maintained and uploaded on the website for easy public access.

#### **4. Resources and Responsibilities for implementing stakeholder engagement activities**

##### **4.1. Resources**

52. The TGTDCCL Management will be in charge of stakeholder engagement activities. In order to ensure successful SEP implementation, a series of capacity building activities are necessary for which the project has to provide adequate funding. A tentative budget of USD 30000 is estimated for implementation of the SEP which will be finalized before project effectiveness. The budget will include the salary of one E&S specialist, printing information brochure, meeting cost and GRM.

##### **4.2. Management functions and responsibilities:**

###### **1. Project Implementation Unit (PIU):**

The Project Implementation Unit (PIU) will be established under the TGTDCCL and will include an Environmental and Social Specialist. The main activities of the PIU with regard to environmental and social safeguards are:

- ✓ Supervision and monitoring of the progress of activities of the consultants and contractors for the implementation of SEP;
- ✓ Conduct consultations with residential and industrial customers and inform them about the project impacts, benefits and mitigation measures.
- ✓ Inform the customers about the contractor's activities and timeline to install the metering
- ✓ Conduct consultation meetings with the community people and housing societies on the SCADA installation and metering.
- ✓ Responsible for modifications to the SEP when unforeseen changes are observed during implementation.
- ✓ Submit necessary monitoring reports on SEP implementation.
- ✓ Ensure disclosure of the project activities among the stakeholders.
- ✓ External communications with other government, semi-government and non-government organizations, universities, research institutes in the country on the matters of mutual interest related to environmental management and filming of activities to be carried out under the project development.

###### **2. Contractor:**

3. The contractor will be responsible for (a) design, procurement, implement and contract management of the project & (b) primarily responsible for preparing and implementing the E&S documents according the commitment plan. Each contractor will be recommended to have one Environmental Specialist and one Occupational & Social, Health and Safety (OHS) Specialist, who will be working in close coordination with the environmental/Social development staff of Consultant and PIU. The main functions of the contractor are:

- ✓ Before installing the meters, inform all residential and industrial customers the timing of the meter installation at least one week before
- ✓ Design, procurement, implementation and contract management of the project and submitting progress reports in regular intervals to the consultant & TGTDCCL.
- ✓ Prior to the start of construction, prepare the OHS plan and other method statements and management plans according to requirements of ESCOP and get them approved by the consultant & TGTDCCL, and disclose among the stakeholders.
- ✓ Prepare monthly reports related to stakeholder’s engagement and monitoring for review and verification by the Consultant & TGTDCCL

53. The project implementation arrangements are as follows:

- ✓ Recruitment of Consultant.
- ✓ Recruitment of Contractor for web system.
- ✓ Web System with Hardware and Software Commissioning
- ✓ Recruitment of EPC Contractor.
- ✓ Site Survey, Procurement, Installation and Commissioning of Meters
- ✓ Preparation of Project Completion Reports

54. TGTDCCL will be responsible for carrying out the stakeholder engagement activities. The stakeholder engagement activities will be documented through meeting minutes, working papers and reports and made available for all stakeholders to be informed and provide feedback.

The entities responsible for carrying out stakeholder engagement activities are:

<b>Responsibilities / Stakeholder Engagement Activities</b>	<b>Responsible Entities</b>
<ul style="list-style-type: none"> <li>- Organize regular meeting with stakeholders</li> <li>- Mass/social media communication (as needed)</li> <li>- Training/Workshop</li> <li>- Disclosure of written information: brochures, posters, flyers, website</li> <li>- Information boards or desks in project areas.</li> <li>- Grievance redress mechanism</li> <li>- Reporting on ESCoP/SEP / GRM to the WB &amp; other interested parties.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional Office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>

55. The Stakeholder engagement activities will be documented through PIU/Consultant/Contractor.



## 5. Grievance Redress Mechanism

56. The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:
- ✓ Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
  - ✓ Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
  - ✓ Avoids the need to resort to judicial proceedings.

### 5.1. Description of GRM

57. Considering the overall need for the total project period, TGTDCCL will establish a GRM to address complaints and grievances. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law. It is essential that an effective and transparent mechanism is designed and established at the earliest opportunity for all members of the community to be able to lodge complaints and grievances. Necessary sign posting/bill board would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The GRM would also be made available online so that grievances could be submitted without the need for physical interaction, especially during the time of COVID-19 crisis. Grievances will be handled by the Grievance Redress System Appellate Authority consisting of 5 officials from TGTDCCL and headed by the Company Secretary/General Manager (Corporate Division).

#### 5.1.1 Formation and Operation of the GRC

58. Grievance redress committees (GRCs) will be formed in each ward where prepaid meter will be installed. Prior to the start of construction, TGTDCCL officials will meet with elected members to request the establishment of such committees, with the understanding that they will have to meet when complaints are received. As a minimum the composition of the GRC will be as follows:
1. Project Director or Representative - GRC Chair and convener
  2. Elected member of concerned ward(s) - GRC Committee member
  3. Female member of concerned ward(s) - GRC Committee member
  4. Environment Specialist-GRC Committee member
  5. Social Specialist- GRC Committee member
  6. Representative from area where grievance was filed- GRC Committee member
59. The GRC would only be convened if direct communication between the contractor, the complainant and the consultant cannot solve the issue quickly. Once the complaint reaches the GRC, the GRC has two weeks to render a decision, based on discussion with all parties involved. The GRC will be used as the third step when filing a complaint.

**60. Grievance Redressal Officer:**

Officer Name : S M Mahbub Alom  
Designation : Deputy General Manager (Company Affairs)  
Phone : 41010005, 41010000-04/122  
Mobile No. : 01939921270  
e-Mail : dgm.companyaffairs@titasgas.org.bd

**61. Appeal Officer:**

Officer Name : Md. Javed Ibne Shahed  
Designation : Deputy General Manager (Company Affairs), Petrobangla  
Phone : +88029127398  
Mobile No. : 01726673083  
e-Mail : javed.shahed@gmail.com

**62. Case Verification Officer:**

Officer Name : Md. Monowar Hossain  
Designation : Deputy General Manager (Legal Affairs)  
Phone : 55012686, 41010000-04/130  
Mobile No. : 01939921223  
e-Mail : dgm.legalaffairs@titasgas.org.bd

63. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse. It is important to have multiple and widely known ways to register grievances. Anonymous grievances can be raised and addressed. Several uptake channels under consideration by the project include:
- ✓ Toll-free telephone hotline
  - ✓ E-mail
64. Having an effective GRM in place will also serve the objectives of:
- ✓ Reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and
  - ✓ Serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes
65. Once a complaint has been received, by any and all channels, it should be recorded in the complaints logbook or grievance excel-sheet/grievance database.

**5.1.2 Steps to a Solution**

- 66. Step 1:** The complainant will be advised to first attempt to settle the complaint through direct communication either orally or in writing to officer at site office. If the discussion between officer & the Complainant/Community is successful, the contractor with the help of consultant will be responsible for undertaking corrective measures within 24 hours and recording the decision and filing that with TGDCL PIU, via the consultant.

- 67. Step 2:** If the complaint not be addressed within 24 hours; the next level would be notify to TGTDCCL. TGTDCCL will then communicate either to the contractor or PIU and a solution will be discussed with the complainant within 7 days. If more time is required, PIU should communicate directly with the complainant describing the reasons of the delay.
- 68. Step 3:** If Step 2 fails to resolve the issue within one week of the receipt of the complaint, the GRC should be formed and a formal hearing undertaken. At this point a decision must be rendered within 2 weeks or the complainants concerns will be deemed correct and immediate mitigate actions will be required and fully executed within 5 days of the end of the 2-week period.
- 69. Step 4:** If Step 3 fails to resolve the issue, the complainant may proceed to legal arbitration.
70. All GRC decisions will be recorded by the GRC, and sent to the TGTDCCL.

#### 5.1.3 Publicizing the Grievance Redress Steps and the Committee

71. Prior to the start of the construction, TGTDCCL or its representative will publicize the establishments of the grievance redress steps and the process, and advertise all via contact information and the grievance redress steps posted at TGTDCCL office, as well as at busy public places in the Project corridor. The poster(s) will be in the local language(s) and posted within 30 days of the start of construction. The TGTDCCL representative will check at least monthly to ensure that the posters are prominently displayed and provide clear contact instructions and numbers. This procedure and monitoring will be reported in the semi-annual monitoring report submitted to the WB.
72. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.
73. Any grievance filed with the GRC, must be reported in the Annual report to the CSC who will then submit a consolidated report to WB via TGTDCCL.
74. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. Anonymous complains will be also accepted. TGTDCCL will maintain the following three Grievance Registers:
- 75. Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant (including anonymous complains), (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.
- 76. Resolution Register:** (1) Serial no., (2) Case no.,(3) Name of complainant including anonymous complains, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field

investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

77. **Closing Register:** (1) Serial no., (2) Case no.,(3) Name of complainant including anonymous complains, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

78. Several uptake channels under consideration by the project include:

- ✓ Toll-free telephone hotline
- ✓ E-mail

79. **Sexual Exploitation and Abuse and Sexual Harassment:** As with all projects, there is a risk that TGTDC office staff, consultant, contractors, labors may assault /abuse female customers and female staff involved in the project. SEA/SH instances include explicit, sexual and inappropriate language, unwanted physical touch, forced labor in exchange for sexual favors and other forms of assault and harassment. The project GRM will be sensitized to receive SEA/SH cases. If the GRM receives a case on SEA/SH related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. A gender focal point will be appointed and after taking informed consent from the survivor will record minimal information: a) the allegation in the survivor's own words; b) if the alleged perpetrator is, to the best of the survivor's knowledge, related to the project; and, if possible, c) the age and sex of the survivor. The possibility of SEA/SH extends amongst stakeholders of the project such as office staff, consultant, contractors, and labors. Once a complaint has been received, by any and all channels, it should be recorded in the complaints logbook or grievance excel-sheet/grievance database.

#### 5.1.4 GRM Monitoring and Reporting

80. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Director of the project. To ensure management oversight of grievance handling, the Internal team will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

## 6. Monitoring and Reporting

### 6.1. Involvement of stakeholders in monitoring activities

81. The stakeholders involved in monitoring activities are: residential households/customers, Contractor, Consultant and industrial customers.

82. Monitoring and reporting will include involving Project Affected Parties, internal and external stakeholders, interested group and the vulnerable in monitoring mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns; thus, promoting transparency. The ESCP will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation and assess whether or not capacity building and training programs will be required to enable affected parties and local council staff participate in monitoring. Furthermore, the project will involve affected parties by gathering their observations to triangulate scientific findings and involve them in discussions of external and monitoring and evaluation missions. Monitoring and evaluation will be adjusted accordingly based on restrictions due to COVID-19.

## 6.2. Reporting back to stakeholder groups

83. The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

84. Half yearly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The report summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

85. The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations.

86. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- ✓ Publication of a standalone annual report on project's interaction with the stakeholders.
- ✓ A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
  - Frequency of public engagement activities;
  - Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI);

- Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
- Type of public grievances received;
- Number of press materials published/broadcasted in the local, regional, and national media;
- Amount of Project's charitable investments in the local communities in the Project Area of Influence.

87. The outcomes/feedback from these 'reporting back' measures will be compiled and shared/disclosed with the stakeholders' and general public through the use of proper media, such as TGDCL website, social media accounts, communication materials, etc.

### **6.3 Reporting to the World Bank**

88. The project director with the support of social and environment specialist will share the progress and results of the stakeholder engagement activities to the World Bank quarterly and annually where Stakeholder related activities will be described broadly. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

**Annex - A: Sample 'Grievance Form' and Grievance Mechanism of the Project**

<b>Grievance Form: Titas Gas Transmission &amp; Distribution Company Limited</b>			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, what happened, when and where it happened, who is the perpetrator and how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like TGTDCCL or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of TGTDCCL official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Completion at TGTDCCL Level</b>			
Final resolution (briefly describe)			
	Short description	Accepted ? (Y/N)	Acknowledgment signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			

3 <sup>rd</sup> proposed solution			
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**STAKEHOLDER ENGAGEMENT PLAN**

**FOR**

**Gas Sector Efficiency Improvement and Decarbonization Project**

**Project ID no: (P179009)**



**Pashchimanchal Gas Company Limited (PGCL)**  
**Bangladesh Oil, Gas & Mineral Corporation ( Petrobangla)**  
**Ministry of Power, Energy & Mineral Resources (MoPEMR)**  
[www.pgcl.org.bd](http://www.pgcl.org.bd)

**December 2022**



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## Abbreviations

PGCL	Pashchimanchal Gas Company Limited
PIU	Project Implementation Unit
ESU	Environment & Social Unit
E&S	Environmental & Social
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard of the 2018 World Bank ESF
GRC	Grievance Resolution Committee
GRM	Grievance Redress Mechanism
HHs	Households
HSE	Health and Safety, Social, and Environment
LNG	Liquefied Natural Gas
LMP	Labour Management Procedure
LGED	Local Government Engineering Department
PD	Project Director
NGO	Non-Governmental Organization
PAP	Project-Affected Person (or Project-Affected Party)
PEZ	Private Economic Zone
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
GBV	Gender Based Violence
SEA	Sexual Exploitation & Abuse
SH	Sexual Harassment

## 1. Introduction/Project Description

### 1.1 Introduction

Stakeholder engagement and communication are important in ensuring transparency, accountability and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with the Gas Sector Efficiency Improvement and Decarbonization Project. This Stakeholder Engagement Plan (SEP) is prepared by Pashchimanchal Gas Company Limited (PGCL). This SEP covers PGCL's activities under component one of this project which are installation of 1,28,000 of prepaid meters for the residential households and few meters will be installed at industrial level as pilot. The SEP also covers meter installation and installation of Supervisory Control and Data Acquisition (SCADA) activities. SEP also covers the Petrobangla's activities under Component 2 (- Technical assistance for the decarbonization of the oil and gas value chain.

89. A separate SEP is prepared by TGTDCCL for the installation of 1.1 million of prepaid meters.

4. .

5. The COVID-19 pandemic has led to a dramatic loss of human life worldwide and presents an unprecedented challenge to public health. Given the COVID-19 pandemic situation (and depending on further outbreaks), public consultation and stakeholder engagement management in the project will be conducted in compliance with national requirements and any updated guidance issued by WHO and the World Bank.

6. The project is being prepared under the World Bank's Environment and Social Framework (ESF) and related national policies and acts. As per the Environmental and Social Standard ESS 10 Stakeholders Engagement and Information Disclosure, the PGCL will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

7. The purpose of the SEP is to support the project in delivering efficient and effective engagement and communication with stakeholders of the investment program so that their views and concerns are reflected in the project, and they are fully informed about the project activities. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

8. The SEP outlines in detail the commitment of the Government of Bangladesh in regard to engaging the stakeholders of the project. It also details the project Grievance Redress Mechanism (GRM) and future plan of action, keeping in mind the COVID-19 context, as a measure to engage with the stakeholders and to resolve any potential cases of grievances arising out of implementation of the project.

### 1.2 Project Objectives

9. "Gas Sector Efficiency Improvement & Decarbonization Project" aims to i) reduce the wastage of natural gas by domestic end users and contribute to sustainable economic growth of Bangladesh through efficient supply & consumption of natural gas ii) improve management of efficient use of gas, reduced monitoring costs and positive environmental impacts, iii) establish a stable gas supply system, collect data & storage and, establish a secure, efficient and effective gas distribution system to PGCL customers and iv) develop a Geographic Information System database framework for the pipeline networks including pipeline integrity management.

10. The project is economically and nationally instrumental as it is a significant step in ensuring efficient use of energy in the domestic sector. The implementation of the project will create opportunities for

the company to collect advance revenue and increase the quality of customer service. If the project is implemented successfully, the professional skills of the manpower working in the project cell and related departments will be enhanced and this skill will play a supportive role in the implementation of large-scale projects in the future. This will create employment opportunities as well as a positive socio-economic impact.

## 1.2 Project Description:

11. Ensuring efficient utilization of natural gas is one of the major policies of Government of Bangladesh at the backdrop of declining natural gas reserve in Bangladesh. Bangladesh needs efficient natural gas supply to keep its development activities in place. Though this country has its own natural resource of natural gas, it is struggling to meet the growing demand due to the depletion of the natural gas reserve. Consequently, Bangladesh has planned to address the problem by increasing the supply through import of natural gas called LNG and decreasing the wastage of natural gas. The wastage means utilization inefficiency and system loss. At present, PGCL has a substantial number of customers who are non-metered. Thus, it is not possible to properly measure and bill the amount of gas consumed by consumers for drying clothes, keeping the house warm during the winter and saving the cost of match sticks as they are non-metered. Furthermore, there is a prevalence of gas theft due to individuals using gas on unauthorized equipment. This type of gas wastage can be seen in densely populated areas. This is an important cause of natural gas wastage and system loss. In this case, the use of prepaid meters with efficient management of gas can prevent gas wastage in the domestic sector, reduce system losses and save energy which will play an important role in national energy security and have a positive impact on the environment. At present Bangladesh has a supply of around 2900 mmscfd natural gas against demand of around 4200 mmscfd. This gap may lead to economic set back, as the demand is increasing day by day.

## 1.4 Project Components

**“Gas Sector Efficiency Improvement and Decarbonization Project”** comprises the following components:

12. **Component 1: Strengthening the gas sector monitoring and control capabilities downstream-** This component will enhance the efficiency of the gas distribution network and end-use through metering systems for residential and industrial consumers and up to 1,100,000 and 128,000 prepaid meters would be installed respectively by Titas in the greater Dhaka area and PGCL in its service territory. Under this component, meters connections will be provided to a selected number of Titas’ and PGCL’s industrial customers as pilot to demonstrate the viability of smart meters for better management of gas usage by industrial customers and improved monitoring of gas use. Supervisory Control and Data Acquisition (SCADA) system will be installed for PGCL to monitor real time pressure and flows. This component will reduce the wastage of natural gas by domestic end users and contribute to sustainable economic growth of Bangladesh through efficient supply & consumption of natural gas.
13. **Component 2: Technical assistance (TA) for the decarbonization of the oil and gas value chain:** This component will be implemented by Petrobangla and Petrobangla will also follow this SEP to the activities under this component.

## 1.4 Project Locations

### 14. Project location for installation of Prepaid Gas Meters

These are the following project locations covered in this SEP by the PGCL and that the overall project area is greater.

1.	Project Geographic Location	<ul style="list-style-type: none"> <li>a) Division</li> <li>b) District</li> <li>c) Upazila</li> <li>d) Others (City Corporation/Pouroshova)</li> </ul>
		<ul style="list-style-type: none"> <li>a) Rajshahi.</li> <li>b) Bogura, Pabna, Sirajganj.</li> <li>c) Bogura Sadar, Shahzadpur, Ullapra, Pabna sadar, Ishawardi, Bera, Santhiya .</li> <li>d) Bogura Pouroshova, Ishwardi Pourashava, Shahzadpur Pouroshova, Ullapara Purashava, Bera Pouroshova, Santhiya Pouroshova, Pabna Pouroshova,</li> </ul>

### 15. Project Location for installation of SCADA & GIS

1.	Project Geographic Location	<ul style="list-style-type: none"> <li>e) Division</li> <li>f) District</li> <li>g) Upazila</li> <li>h) Others (City Corporation/Pouroshova)</li> </ul>
		<ul style="list-style-type: none"> <li>e) Rajshahi &amp; Rangpur.</li> <li>f) Bogra, Pabna, Sirajganj, Rajshahi, Rangpur &amp; Nilphamari</li> <li>g) Bogura Sadar, Sirajganj Sadar, Shahzadpur, Ullapra, Pabna sadar, Ishawardi, Bera, Santhiya , Rajshahi sadar, Rangpur Sadar, Pirganj, Syedpur &amp; Nilphamari sadar.</li> <li>h) Rajshahi City Corporation, Rangpur City Corporation, Sirajganj Pouroshova, Bogura Pouroshova, Ishwardi Pourashava, Shahzadpur Pouroshova, Bera Pouroshova, Santhiya Pouroshova, Pabna Pouroshova, Pirganj pouroshova, Syedpur Pouroshova &amp; Nilphamari Pouroshova.</li> </ul>

Figure 1 : Project Location for installation of Prepaid Gas Meters.



Figure 2: Project Location for installation of SCADA & GIS

### 1.5 Summary of the potential social and environmental risks and impacts of the projects

16. The project work would involve Installation of 128,000 Prepaid Gas Meters to residential households, some pilot meter connections to industry, SCADA & GIS at PGCL Franchise Area.

## **17. Environmental Risks and Impacts**

- There may be environmental pollution due to some leakages of natural gas during implementation & commissioning period of prepaid gas meters & SCADA system. But the amount of gas leakage is negligible.
- GI line modification works of domestic customers would create some dust and noise pollution.
- Labor and Construction workers will also generate solid waste that may impact the surrounding environment.

## **18. Social Risks and Impacts**

- Gas supply may be interrupted for customers at times during implementation & commissioning period of prepaid gas meters & SCADA system, however this can be mitigated through giving prior information to the households
- Minor OHS risks related to installing the meters can be expected (e.g. potential exposure to gas leakage, fires/ explosions if leaky connections are fixed without closing the check valve, accidents during installations).
- Community health and safety concerns such as incidents and accidents associated with gas connections, SEA/SH and COVID-19, etc.

## **19. Potential social benefits and opportunities of the program:**

- All the 128,000 residential customers will be connected to the gas metering system
- Gas will be consumed more efficiently as customers will pay for what they consume.
- Gas wastage will be reduced.
- The local Labor force will be employed for the construction works.
- The project will induce improved management efficiency, efficient use of gas, reduced monitoring costs and positive environmental impacts.
- A stable gas supply system, data collection & storage, secure, efficient, and effective gas management system to the PGCL customers will be established.

## **1.6. Objectives of the Stakeholder Engagement Plan (SEP)**

20. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the local population is essential to the success of the project to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

## **21. The SEP:**



- ✓ Involves interactions between and among identified groups of people mainly the residential households and industrial entities and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project.
  - ✓ Begins early during the project planning process to gather initial views on the project proposal and design.
  - ✓ Encourages stakeholder feedback, especially by informing stakeholders of the project design and engaging them in the identification and mitigation of environmental and social risks and impacts.
  - ✓ Considers and responds to stakeholder feedback.
  - ✓ Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages, which is understandable to stakeholders.
  - ✓ Supports active and inclusive engagement with project affected parties and project beneficiary groups
22. In addition, the SEP of the proposed project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

### **1.7 World Bank requirements for stakeholder engagement**

23. The project is being prepared under the World Bank's Environment and Social Framework (ESF). 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". ESS 10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and significantly contribute to successful project design and implementation.
24. As defined by the ESF and ESS 10, 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. According to ESS 10, Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project. PGCL will ensure the following engagement procedures:
- PGCL will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
  - PGCL will engage in meaningful consultations with all stakeholders and will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally

appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

- The process of stakeholder engagement will involve the following, as set out in further detail in this SEP: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- PGCL will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.

25. PGCL has prepared this draft SEP based on the nature and scale of the project and its potential risks and impacts. Stakeholders have been identified and if any new stakeholders are identified during project implementation, the SEP will be updated to include them. This SEP will be disclosed for public review and feedback before the project is placed for the World Bank appraisal.

## 2. Stakeholder identification and analysis

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

- ✓ are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as ‘affected parties’); and
- ✓ 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.

27. Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way. With community gatherings limited or forbidden under COVID-19, it may mean that the stakeholder identification will be on a much more individual basis, requiring different media to reach affected individuals.

### 2.1 Methodology

28. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- ✓ *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;

- ✓ *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns and closing the feedback loop.
- ✓ *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders always are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly, and ethnic groups (if any).

29. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

30. **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly 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.

31. **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

32. **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 status<sup>1</sup>, and who may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

33. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks, and agendas. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

## 2.2. Affected parties

34. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Domestic and industry customers.
- Communities in the vicinity of the project's planned activities.
- The local population and local communes

- Residents, business entities, and individual entrepreneurs in the project area that can benefit from the employment, training, and business opportunities
- PGCL Household customers around the project whose gas supply system will be metered.
- PGCL CNG, Industrial, Captive & Commercial Customers as their RMS will be under proposed SCADA System.
- NWPGL as their Unit-1, Unit-2 and Unit-3 CMS will be under proposed SCADA system.
- PDB as their Baghabari 171 MW Power Plant CMS will be under proposed SCADA system.
- SNWPCL as their 413 MW Power Plant CMS will be under proposed SCADA system.
- ERD, Ministry of Finance
- Local Administration /Municipality
- Local Leadership
- Consultant
- Contractor
- Labor

### 2.3. Other interested parties

35. The projects' stakeholders also include parties other than the directly affected communities, including:

- ✓ Civil society groups and NGOs on the regional, national, and local levels, who have environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's Direct Area of Influence.
- ✓ Business owners and providers of services, goods and materials who will be involved in the project's material /service supply;
- ✓ Mass media and associated interested groups including District and local Press Club, local, regional and national print and broadcasting media, digital/web-based entities, and their associations.
- ✓ PGCL enlisted 11 Category Contractors who will be engaged in internal GI line modification of household customers.
- ✓ Design & Supervision Consultant.
- ✓ EPC Contractors who will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
- ✓ Local Labor involved during project implementation stage.
- ✓ Bank involved in providing the credit transfer facilities by apps/other system in smart prepaid metering system.
- ✓ Internet Provider/Network Operators (Mobile Operators/ BTCL/others) who will provide data transfer system for SCADA/GIS/Prepaid meter and credit transfer system in case of sim based smart prepaid metering system.

Other interested parties	Interest in the project
<b>International Level</b>	
Environmental and societal NGOs	They may have concerns of the project's impact on the environment and society and may want to voice their opinion of the range of risks and opportunities associated with the project(s).

<b>Other interested parties</b>	<b>Interest in the project</b>
Academics and researchers	They may have professional knowledge of the impacts of the project, which they can discuss with the implementing agency for the betterment of the project and society.
Training service providers	They would provide the training and skill development programs for employees.
EPC Contractors	They will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
Design & Supervision Consultant.	They shall be recruited to monitor overall project management and supervision including procurement, design, contract management, and reporting of safeguards aspects such ESCoPs, LMP, SEP etc.
<b>National Level</b>	
Training service providers	They would be providing the training and skill development programs for employees.
Environmental and societal NGOs	They may have concerns of the project's impact on the environment and society and may want to voice their opinion of the range of risks and opportunities associated with the project(s).
Mass media	They are intermediaries for informing the public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
EPC Contractors	They will be engaged for Prepaid Gas Meters, SCADA installation and GIS development.
Internet Provider/Network Operators (Mobile Operators/ BTCL/others)	-They would provide the data transfer system as well as credit transfer in case of sim based smart prepaid metering system. - They would provide the data transfer system in SCADA & GIS System.
<b>Regional and District level</b>	
Mass media	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.
PGCL enlisted 11 Category Contractors	They will be engaged in internal GI line modification of household customers
Local Labor	They will be engaged during implementation of Project.
Local small businessman	Small scale businessmen in the project vicinity would be benefitted by selling GI pipe and fittings required for internal line modification to install prepaid meter.
Local Vendors/Credit Operators	Local Vendors/Credit Operators will be benefitted by credit transfer/selling recharge cards to customers.

**2.4. Disadvantaged / vulnerable individuals or groups**

36. Project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or do not understand the impacts of a project. The project will ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups take place , especially those with particular sensitivities (especially cultural or ethnic), and concerns to ensure a full understanding of project activities and benefits, with full cognizance and attention towards cultural sensitivities and customs. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other

individuals or natural resources, etc. Engagement with 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.

37. Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- ✓ Women, Elderly, illiterate & disabled peoples will be affected by the project as they may face difficulties to recharge credit & use other associated functions of prepaid gas meter.
- ✓ Patients, elderly Persons and individuals with physical and mental disabilities

38. Vulnerable groups within the communities affected by the project will be further identified and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

### 3. Stakeholder Engagement Program

#### 3.1. Summary of stakeholder engagement done during project preparation

39. A stakeholder meeting regarding the prepaid meter installation in PGCL franchise area was held on 15/09/2022 at 10.00 am on virtual platform. The domestic customers under six regional offices (RO) ( Sirajgonj , Baghabari, Pabna,Rajshahi,Ishwardi and Bogura ) of PGCL were present from their respective RO. In addition, regional offices conducted 4 consultation meetings with the residential and industrial customers including the vulnerable customers. Total participants were 42. Apart from the customer, the PGCL officials under different level including General Manager (P&D), General Manager (Marketing), DGM(Sales), Manager (Strategic Planning) were also present. Concerns raised by the stakeholders including the vulnerable customers were taken into account for project preparation. The draft SEP was discussed with the stakeholders during consultations.

40. Discussed issues and outcomes of the consultation meeting

- ✓ All the residential and commercial customers are in favor of the project
- ✓ Residential customers requested to inform them one week before the meter connection
- ✓ Residential customers requested training on meter handling
- ✓ Customers requested to install the meters carefully so that installation does not affect the structure
- ✓ the benefits of the prepaid meter,
- ✓ the cost involvement for their (customer) end,
- ✓ the nos. of prepaid meter requirement in case of multiple burner user,
- ✓ monthly charge for meter,
- ✓ the charging procedure of prepaid card,
- ✓ availability of vending station for charging,
- ✓ the bill involvement in case of nonuse of burner for a time period,
- ✓ the maximum and minimum amount of charging,

- ✓ the validity of a card,
- ✓ the arrangement of emergency balance in the meter,
- ✓ the service for replacement of meter and
- ✓ prepaid card in case of damages or nonoperational of meter/card etc.

Feedback received during the consultations was to install prepaid gas meters to all 128000 residential customers and installation of SCADA system. Hence, consultations help to reduce waste of gas by raising the awareness of domestic customers in the region of using gas more efficiently. The feedback was taken into account by the PGCL Management.

### 3.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

#### 41. Precautions to prevent the spread of Covid-19

A precautionary approach will be taken for the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation:

- ✓ Avoid public gatherings (considering national restrictions or advisories), including public hearings, workshops, and community meetings.
- ✓ If smaller meetings are permitted/ advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels.
- ✓ Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders.
- ✓ Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders and allow them to provide their feedback and suggestions.
- ✓ Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators.
- ✓ Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

42. In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below: The methods used would vary according to the target audience and would include:

- Public/community meetings in post covid-19 situation.
- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged
- Separate meetings for women and vulnerable with female moderators.

- Face-to-face meetings in post covid-19 situation.
- Focus Group Discussions.
- Workshop with the Experts.
- Surveys, polls etc.
- Interviewing stakeholders and relevant organizations
- Mass/social media communication (as needed)
- Disclosure of written information: brochures, posters, flyers, website Information boards or desks at various sites
- Grievance mechanism
- PGCL website

### 3.3. Proposed strategy for information disclosure

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Project Preparation Phase	Experts in the field of ES, Journalists, NGOs, Domestic Customers, NWPGL, PDB, SNWPCL, CNG Industrial, Captive & Commercial Customers of Project Area, Petrobangla, EPC Contractors, Design & Supervision consultants, Network Operators/ Internet Provider etc. PGCL Enlisted 1.1 Category Contractors.	SEP/ESCP/ESCO/ LMP	-PGCL website, Newspaper advertisement, District and Upazila administration website and notice board. - As soon as the concerned documents are uploaded in the website/published
Construction Phase	EPC Contractors, Design & Supervision consultant, PGCL Enlisted 1.1 Category Contractors, Local Suppliers, Local workers, Network Operators/ Internet Provider, Local vendors/credit operators, Domestic Customers, PDB, NWPGL, SNWPCL, CNG Industrial, Captive & Commercial Customers of Project area, Petrobangla.	Bidding Documents, Labor management Plan, Implementation Progress report Site/specific construction information	PGCL Website – as soon as possible Meeting – once a month. Signboard- two in project’s regional office. Brochures – as per need FGD – as per need
Operation Phase	Bank, Network Operators/ Internet Provider, Credit Operators / Local Vendors, Domestic Customers, NWPGL, PDB, SNWPCL, CNG Industrial, Captive & Commercial Customers of Project area, Petrobangla.	Skills development Program	Meeting – twice a month. Brochures – as per need FGD – as per need

43. The current website of PGCL is being used to disclose project documents, including those on environmental and social performance in both Bengali and English. PGCL will create a new webpage for the Project. All future project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the PGCL’s website. An easy-to understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on



the website. Contact details of the Outreach Team will also be made available on the website. PGCL will update and maintain the website regularly (at least on quarterly basis).

### 3.4. Stakeholder engagement plan

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders	Responsibilities
<b>STAGE 1: PROJECT PREPARATION (PROJECT DESIGN, SCOPING, E&amp;S DOCUMENTATION)</b>	<ul style="list-style-type: none"> <li>- Project scope and rationale</li> <li>- LMP, SEP disclosures</li> <li>- Project E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Project SEA/SH risks</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- Public meetings, separate meetings for women and vulnerable in post covid-19 situation.</li> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meeting in post covid-19 situation.</li> <li>- Mass/social media communication (as needed).</li> <li>- Disclosure of written information: brochures, posters, flyers, website.</li> <li>- Information boards or desks in project areas.</li> <li>- Grievance mechanism.</li> <li>- PGCL website.</li> </ul>	<p><b>Project Affected People:</b></p> <ul style="list-style-type: none"> <li>- PGCL Domestic and industrial Customers in Project Areas.</li> <li>- NWPGL, PDB, Industrial, Captive &amp; Commercial Customers of PGCL in Project Areas.</li> <li>- Vulnerable Customers in project areas (Elder/disable/illiterate/Poor).</li> <li>- Local administration.</li> <li>- Local leadership.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>
	<ul style="list-style-type: none"> <li>- Project scope, rationale and E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Project SEA/SH risks</li> <li>- LMP, SEP disclosures</li> <li>- Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Meetings, trainings/workshops</li> <li>- Mass/social media communication</li> <li>- Disclosure of written information: Brochures, posters, flyers, website</li> <li>- Information boards or desks in project area.</li> <li>- Grievance mechanism</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> <li>- Bank</li> <li>- Network Operators/Internet Provider.</li> <li>- Academic institutions.</li> <li>- National Government Ministries</li> <li>- Bogura, Pabna, Ishwardi, Ullapara, Baghabari ,Bera &amp; Santhiya Government Departments.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>
	<ul style="list-style-type: none"> <li>- Legal compliance issues</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Other Government Departments including DoE from which</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional office</li> </ul>

<b>Stage</b>	<b>Topic(s) of engagement</b>	<b>Method(s) used</b>	<b>Target stakeholders</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"> <li>- Project information scope and rationale and E&amp;S principles</li> <li>- Project E&amp;S risks</li> <li>- Coordination activities</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post covid-19 situation.</li> <li>- Invitations to public/community meetings</li> <li>- Submission of required reports</li> </ul>	<ul style="list-style-type: none"> <li>permissions/clearances are required;</li> <li>- Petrobangla.</li> <li>- Other project developers, donors</li> </ul>	<ul style="list-style-type: none"> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- Contractor</li> </ul>
	<ul style="list-style-type: none"> <li>- Project information: scope and rationale and E&amp;S principles</li> <li>- Training requirements and other management plans</li> <li>- Grievance mechanism process</li> <li>- E&amp;S requirements</li> <li>- Feedback on consultant/contractor reports</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post covid-19 situation.</li> <li>- Trainings/workshops</li> <li>- Invitations to public/community meetings</li> </ul>	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>-Other PGCL staffs</li> <li>-Design &amp; supervision Consultants.</li> <li>-PGCL Enlisted 11 category Contractors.</li> <li>- EPC Contractors, sub-contractors.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> </ul>
<b>STAGE 2: CONSTRUCTION AND MOBILIZATION ACTIVITIES</b>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- Health and safety impacts (community H&amp;S, community concerns</li> <li>- Project status</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID 19 period digital/IT based interactions/ FGD in small groups through VTC/ other means to be arranged</li> <li>-Project’s designated staff to conduct visits with a specified periodicity. However, There would be restrictions in reaching COVID-19 affected households.</li> </ul>	<p><b>Project Affected People</b></p> <ul style="list-style-type: none"> <li>- PGCL Domestic and industrial Customers in Project Areas.</li> <li>- Vulnerable Customers of project areas.</li> <li>- NWPGL, PDB, SNWPCL, CNG, Industrial, Captive &amp; Commercial Customers of PGCL project areas.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- Contractor</li> </ul>

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders	Responsibilities
		<ul style="list-style-type: none"> <li>- Public meetings, workshops</li> <li>-Separate meetings as needed for women and vulnerable in post COVID -19 situation</li> <li>-Disclosure of written information: brochures, posters, flyers in Bangla,</li> <li>-PGCL website</li> <li>-Notice board(s) at construction sites (Bangla)</li> </ul>		-
	<ul style="list-style-type: none"> <li>- Project information - scope and rationale and E&amp;S principles</li> <li>- Project status</li> <li>- Health and safety impacts</li> <li>- Employment opportunities</li> <li>- Environmental concerns</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Meetings, trainings/workshops</li> <li>- Mass/social media communication</li> <li>- Disclosure of written information: Brochures, posters, flyers, website</li> <li>- Information boards or desks in project area.</li> <li>- Grievance mechanism</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> <li>- Bank</li> <li>- Network Operators/Internet Provider.</li> <li>- Academic institutions.</li> <li>- National Government Ministries</li> <li>- Bogura, Pabna, Ishwardi, Ullapara, Baghabari ,Bera &amp; Santhiya Government Departments.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>
	<ul style="list-style-type: none"> <li>- Legal compliance issues</li> <li>- Coordination activities</li> <li>- Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings.</li> <li>- Invitations to public/community meetings</li> <li>- Submission of required reports</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Petrobangla.</li> <li>- Other project developers, donors</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>

Stage	Topic(s) of engagement	Method(s) used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> <li>- Project information: scope and rationale and E&amp;S principles</li> <li>- Training on E&amp;S requirements and other sub-management plans</li> <li>- Worker grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- During COVID-19 period digital/ IT based interactions/ FGD in small groups through VTC/other means to be arranged.</li> <li>- Face-to-face meetings in post COVID situation.</li> <li>- Trainings/workshops</li> <li>- Invitations to public/community meetings</li> <li>-</li> </ul>	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>-Other PGCL staffs</li> <li>-Design &amp; supervision Consultants.</li> <li>-PGCL Enlisted 1.1 category Contractors.</li> <li>- EPC Contractors, sub-contractors.</li> <li>-Local Labor</li> <li>-Local vendors/credit operators.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>
<b>STAGE 3: OPERATION &amp; MAINTENANCE</b>	<ul style="list-style-type: none"> <li>- Satisfaction with engagement activities and GRM</li> <li>- Grievance mechanism process</li> <li>- Damage claim process</li> </ul>	<ul style="list-style-type: none"> <li>- Outreach to individual PAPs</li> <li>- PGCL website</li> <li>- Grievance mechanism</li> </ul>	<p><b>Project Affected People:</b></p> <ul style="list-style-type: none"> <li>- PGCL Domestic Customers of Project Areas.</li> <li>- NWPGL, PDB, SNWPCL, CNG, Industrial, Captive &amp; Commercial Customers of Project areas.</li> <li>- Vulnerable Customers.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant</li> <li>- EPC Contractor</li> </ul>
	<ul style="list-style-type: none"> <li>- Grievance mechanism process</li> <li>- Issues of concern</li> <li>- Status and compliance reports</li> </ul>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- PGCL website</li> <li>- Face-to-face meetings in post covid situation.</li> <li>- Submission of reports as required</li> </ul>	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>- Press and media</li> <li>- NGOs</li> <li>- Bank</li> <li>- Network Operators/Internet Providers</li> <li>- Academic institutions</li> <li>- National Government Ministries</li> <li>- Bogra, Pabna, Ishwardi, Baghabari &amp; Bera-Santhiya Government Departments.</li> <li>-Petrobangla.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,ESU</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant</li> <li>- EPC Contractor</li> </ul>

<b>Stage</b>	<b>Topic(s) of engagement</b>	<b>Method(s) used</b>	<b>Target stakeholders</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"> <li>- Grievance mechanism process</li> <li>- Issues of concern</li> </ul>	<ul style="list-style-type: none"> <li>- Grievance mechanism</li> <li>- PGCL website</li> <li>- Face-to-face meetings in post covid Situation</li> <li>- Submission of reports as required</li> </ul>	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>-Design &amp; supervision Consultants.</li> <li>-PGCL Enlisted 11 category Contractors.</li> <li>- EPC Contractors, sub-contractors</li> <li>-Local vendors/credit operators.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU,</li> <li>- PD</li> <li>- Regional office</li> <li>- Consultant</li> <li>- Contractor</li> </ul>

### 3.5. Proposed strategy to incorporate the view of vulnerable groups

44. The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information related to the component. The details of strategies that will be adopted to effectively engage and communicate to vulnerable group will be considered during project implementation.

*Table 1: Vulnerable Group and Proposed strategy*

Target Group	Strategy
Customers with disabilities, illiterate and elder of the Project area.	<ul style="list-style-type: none"> <li>• Separate, targeted consultations for vulnerable groups.</li> <li>• Special training for vulnerable groups to demonstrate recharging &amp; gas volume checking procedure of prepaid gas meter.</li> <li>• Prepaid meter operational manual will be translated in Bangla.</li> </ul>
Financially weak Customers	<ul style="list-style-type: none"> <li>• Cost of installed meters of all customers will be charged as monthly rent.</li> </ul>
Women	<ul style="list-style-type: none"> <li>• Inform them about the timeline of the meter installation</li> <li>• Identify if any additional support required from the project</li> </ul>

### 3.6. Reporting back to stakeholders and closing the feedback loop

45. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

- 46. Review of Comments:** The comments will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:

- ✓ Comments received from stakeholders orally or in the written form at the project level;
- ✓ Responsible officer would summarize the comments and inform the Project Director (PD) ;
- ✓ The E&S Specialist on behalf of PD would respond to the comments by oral or written means at the project level (If the comments are in the written form, then the answer will be also in the written form)
- ✓ The PD may also himself organize the meeting with respective stakeholders
- ✓ If it's not solved by PD, then it will be addressed by GM (Admin) of PGCL.
- ✓ If it is not solved at GM (Admin), it will come to PGCL Executive level.
- ✓ The Responsible Officer will share the summary of the comments to stakeholders in every level.
- ✓ A written record of all these will be kept and maintained and uploaded in the relevant website for easy access of all.

#### 4. Resources and Responsibilities for implementing stakeholder engagement activities

##### 4.1. Resources

47. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within PGCL PIU, its regional offices, consultant and contractors. The project will ensure necessary logistics and budget to implement the SEP as per above mentioned discussion. In order to ensure successful SEP implementation, a series of capacity building activities are necessary for which the project has to provide adequate funding. It is difficult to prepare exact budget for capacity building activities and trainings on this stage of SEP preparation. However, a tentative budget for implementation of SEP is given below. The contact information of PGCL is given on the right. Table 2 indicates the Tentative Budget for implementing the SEP:

Description	Contact details
Company:	Pashchinamchal Gas Company Limited
To:	Project Ditecor, “ Gas Sector Efficiency Improvement and Decarbonization Project”
Address:	Nalka, sirajganj.
E-mail:	<a href="mailto:planning.pgcl@gmail.com">planning.pgcl@gmail.com</a>
Website:	<a href="http://www.pgcl.org.bd">www.pgcl.org.bd</a>
Mobile:	01730357230

Table 2 : Tentative budget for implementation of SEP

Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times (Month )	Total Cost (USD)
Staff salaries (one E&S specialist)	1	1500	12	18,000
Travel expenses	4	100	24	9600
Information Desk Officer	4	300	24	28800
Stakeholder/Community/Sensitization meeting	200	50	-	10000
Meeting with Union Parisad and Upazila Administration	20	100		2000
Meeting with District Administration	20	200		4000
Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.)		Lump sum		20000
Training on Social and Environmental issues (Batch, per batch 20 persons)	10	2000		20000
Engaging Service Providers ( Gov. & Non-GOV)		Lump sum		8000
Travel Expenses for Senior staffs of Ministry/PGCL/Others		Lump sum		10000
<b>Grievance Redress Activities</b>				
Communication Materials		Lump sum		10000



Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times (Month)	Total Cost (USD)
GRM Guidebook	Lump sum			5000
Suggestions Box	Lump sum			2000
GRM MIS Database	Lump sum			5000
Training on GRM (Committees and Contractor staff)	5	2000		10000
Honorarium for committees	Lump sum			10000

#### 4.2. Management functions and responsibilities

48. The stakeholder engagement activities will be incorporated into the project management system with the formation of PIU, strengthening HES and deploying a design & supervision consultant to assist to implement the day-to-day project implementation activities. The roles and responsibilities of the organizations that would implement the project are presented below:

#### 49. Project Implementation Unit (PIU)

The Project Implementation Unit (PIU) will be established under the PGCL and will include an Environmental and Social Specialist. The main activities of the PIU with regard to environmental and social safeguards are:

- ✓ Supervision and monitoring of the progress of activities of the consultants and contractors for the implementation of SEP ;
- ✓ Conduct consultations with residential and industrial customers and inform them about the project impacts, benefits and mitigation measures.
- ✓ Inform the customers about the contractor's activities and timeline to install the metering
- ✓ Conduct consultation meetings with the community people and housing societies on the SCADA installation and metering.
- ✓ Responsible for modifications to the SEP when unforeseen changes are observed during implementation;
- ✓ Submit necessary monitoring reports on SEP implementation.
- ✓ Ensure disclosure of the project activities among the stakeholders.
- ✓ External communications with other government, semi-government and non-government organizations, universities, research institutes in the country on the matters of mutual interest related to environmental management and filming of activities to be carried out under the project development.

50. **Contractor:** The contractor will be responsible for (a) design, procurement, implement and contract management of the project & (b) primarily responsible for preparing and implementing the E&S documents according the commitment plan. Each contractor will be recommended to have one Environmental Specialist and one Occupational & Social, Health and Safety (OHS) Specialist, who will be working in close coordination with the environmental/Social development staff of Consultant and PIU. The main functions of the contractor are:

- ✓ Before installing the meters, inform all residential and commercial customers the timing of the meter installation at least one week before
- ✓ Design, procurement, implementation and contract management of the project and submitting progress reports in regular intervals to the consultant & PGCL.

- ✓ Prior to the start of construction, prepare the OHS plan and other method statements and management plans according to requirements of ESCOP and get them approved by the consultant & PGCL, and disclose among the stakeholders.
- ✓ Prepare monthly reports related to stakeholder's engagement and monitoring for review and verification by the Consultant & PGCL

51. The entities responsible for carrying out stakeholder engagement activities are:

<b>Responsibilities / Stakeholder Engagement Activities</b>	<b>Responsible Entities</b>
<ul style="list-style-type: none"> <li>- Organize regular meeting with stakeholders</li> <li>- Mass/social media communication (as needed)</li> <li>- Training/Workshop</li> <li>- Disclosure of written information: brochures, posters, flyers, website</li> <li>- Information boards or desks in project areas.</li> <li>- Grievance mechanism</li> <li>- Reporting on SEP / GRM to the WB &amp; other interested parties.</li> </ul>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- PD</li> <li>- Regional Office</li> <li>- Consultant (Environment &amp; Social Specialist)</li> <li>- EPC Contractor</li> </ul>

52. The Stakeholder engagement activities will be documented through PIU/Consultant/Contractor.

## 5. Grievance Mechanism

53. The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- ✓ Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of project.
- ✓ Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- ✓ Avoids the need to resort to judicial proceedings.

54. Considering the overall need for the total project period, PGCL will establish a GRM to address complaints and grievances. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law. It is essential that an effective and transparent mechanism is designed and established at the earliest opportunity for all members of the community to be able to lodge complaints and grievances. Necessary sign posting/billboard would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The GRM would also be made available online so that grievances could be submitted without the need for physical interaction, especially during the time of COVID-19 crisis.

## 5.1 Formation and Operation of the GRC

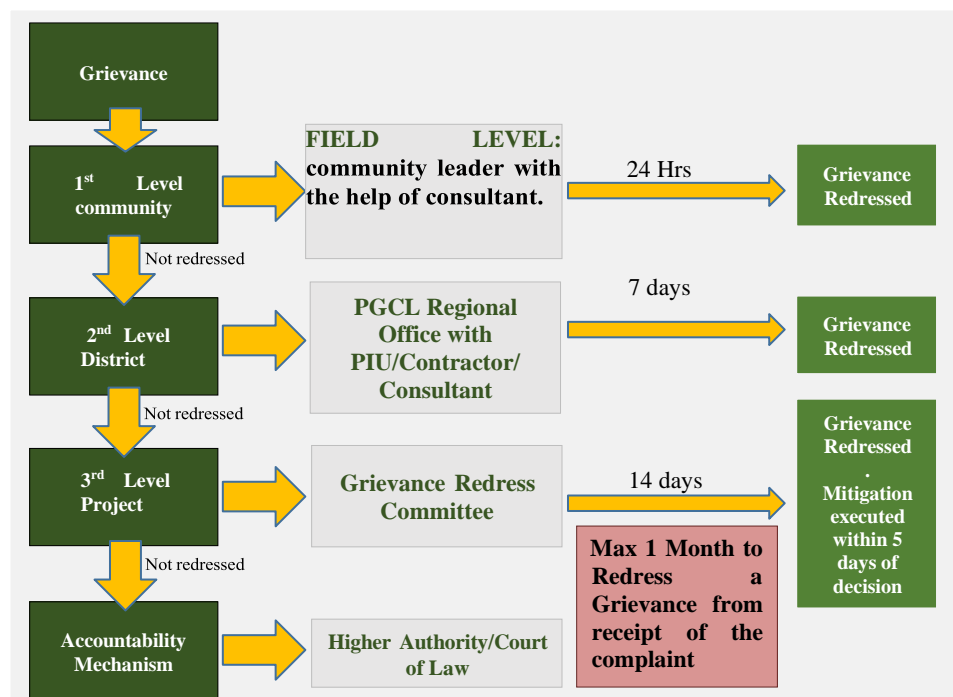
55. Community, district and project level Grievance redress committees (GRCs) will be formed. Community level grievances will be dealt by the respective leader of the residential areas/industry with the support of the E&S specialist of the PIU and contractor. This community level GRC will be formed in each residential area.
56. Local GRC will be formed at each local project offices where prepaid meter will be installed. Prior to the start of construction, PGCL officials will meet with elected members to request the establishment of such committees, with the understanding that they will have to meet when complaints are received.
57. The member of the local GRC will be
  1. PGCL site office in charge/representative-GRC chair and convener
  2. Elected member/ward commissioner-member
  3. Representative from the residential housing-member
  4. Representative from the industry-member
  5. Representative from the local NGO-member
58. Project level GRC will be formed, and the member will be as follows:
  1. Project Director or Representative - GRC Chair and convener
  2. Elected member of concerned ward/union - GRC Committee member
  3. Female member of concerned ward/union - GRC Committee member
  4. Environment and Social Specialist-GRC Committee member
  6. Representative from area where grievance was filed- GRC Committee member
59. The GRC would only be convened if direct communication between the contractor, the complainant and the consultant cannot solve the issue quickly. Once the complaint reaches the GRC, the GRC has two weeks to render a decision, based on discussion with all parties involved. The GRC will be used as the third step when filing a complaint.

## 5.2 Steps to a Solution

60. **Step 1:** The complainant will be advised to first attempt to settle the complaint through direct communication either orally or in writing to officer at site office. If the discussion between officer & the Complainant/Community is successful, the contractor with the help of consultant will be responsible for undertaking corrective measures within 24 hours and recording the decision and filing that with PGCL PIU, via the consultant.
61. **Step 2:** If the complaint is not resolved within 24 hours; the next level would be notify to PGCL Regional office. PGCL Regional Office will then communicate either to the contractor or PGCL PIU and a solution will be discussed with the complainant within 7 days. If more time is required, PGCL PIU should communicate directly with the complainant describing the reasons of the delay.
62. **Step 3:** If Step 2 fails to resolve the issue within one week of the receipt of the complaint, the GRC should be formed and a formal hearing undertaken. At this point a decision must be rendered within 2 weeks or the complainants concerns will be deemed correct and immediate mitigation actions will be required and fully executed within 5 days of the end of the 2-week period.
63. **Step 4:** If Step 3 fails to resolve the issue, the complainant may proceed to legal arbitration.
64. All GRC decisions will be recorded by the GRC, and sent to the local and head office of PGCL.

### 5.3 Publicizing the Grievance Redress Steps and the Committee

65. Prior to the start of the construction, PGCL or its representative will publicize the establishments of the grievance redress steps and the process and advertise all via contact information and the grievance redress steps posted at every PGCL Regional office involved, as well as at busy public places in the Project corridor. The poster(s) will be in the local language(s) and posted within 30 days of the start of construction. The PGCL representative will check at least monthly to ensure that the posters are prominently displayed and provide clear contact instructions and numbers. This procedure and monitoring will be reported in the semi-annual monitoring report submitted to the WB.



66. The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

67. Any grievance filed with the GRC, must be reported in the semi-annual report which will be shared with WB.

68. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. PGCL will maintain the following three Grievance Registers:

69. **Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant including anonymous complaints (4) Gender, (5) Father or husband, (6) Complete address, (7) Main

objection (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

70. **Resolution Register:** (1) Serial no., (2) Case no.,(3) Name of complainant including anonymous complaints, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.
71. **Closing Register:** (1) Serial no., (2) Case no.,(3) Name of complainant anonymous complaints, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.
72. Several uptake channels under consideration by the project include:
  - Toll-free telephone hotline
  - E-mail
73. Complaints related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)
74. If the GRM receives a case on SEA/SH related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers of the government. A gender focal point will be appointed and after taking informed consent from the survivor will record minimal information: a) the allegation in the survivor's own words; b) if the alleged perpetrator is, to the best of the survivor's knowledge, related to the project; and, if possible, c) the age and sex of the survivor.
75. As with all projects, there is a risk that PGCL office staff, consultant, contractors, labors may assault /abuse female customers and female staff involved in the project. SEA/SH instances include explicit, sexual and inappropriate language, unwanted physical touch, forced labor in exchange for sexual favors and other forms of assault and harassment. The project GRM will be sensitized to receive SEA/SH cases. If the GRM receives a case on SEA/SH related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers.

The examples of abuse and harassment by project staff/ client to the beneficiaries may include:

**Sexual Abuse**

- PGCL office staff, consultant, contractors, labors may assault /abuse female customers.

**Sexual Harassment**

- PGCL office staff, consultant, contractor, labor may use explicit, sexual and inappropriate language on female customers.

76. Once a complaint has been received, by any and all channels, it should be recorded in the complaints logbook or grievance excel-sheet/grievance database.

**5.4 GRM Monitoring and Reporting**

77. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Director of the project. To ensure management oversight of grievance handling, the

Internal team will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

### 5.5 GRM contact information

78. Information on the project and future stakeholder engagement programs will be available on the PGCL’s website and will be posted on information boards in the Project site / Project office/Regional Office. The point of contact regarding the stakeholder engagement program at PGCL is given below:

Description	Contact details
Company:	Pashchimanchal Gas Company limited
To:	Project Director, “Gas Sector Efficiency Improvement and Decarbonization Project”
Address:	Nalka, Sirajganj
E-mail:	<a href="mailto:Planning.pgcl@gmail.com">Planning.pgcl@gmail.com</a>
Website:	<a href="http://www.pgcl.org.bd">www.pgcl.org.bd</a>
Contact No.	01730357230

## 6. Monitoring & Reporting

### 6.1 Involvement of stakeholders in monitoring activities

79. Monitoring and reporting will include involving Project Affected Parties, internal and external stakeholders, interested groups and the vulnerable in monitoring mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns; thus, promoting transparency. The ESCP will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation and assess whether or not capacity building and training programs will be required to enable affected parties and local council staff participate in monitoring. Monitoring and evaluation will be adjusted accordingly based on restrictions due to COVID-19.
80. The SEP will be periodically revised and updated by the Social Specialist as necessary in the course of project implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This would provide opportunity to include a newly identified stakeholder group who might have been missed/were absent during the initial SEP preparation.
81. This being a very small project, PGCL is not planning for any third party’s monitoring to ensure the proper implementation of SEP. The PD and PIU would address the issue of effective implementation of the SEP.

### 6.2 Reporting back to stakeholder groups and closing the feedback loop

82. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address them in a timely and effective manner.

83. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in variety of ways, including:

- ✓ Publication of a standalone annual report on project's interaction with the stakeholders.
- ✓ Through continuous engagement with the stakeholders such as public/community meetings etc.
- ✓ A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
  - Frequency of public engagement activities.
  - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
  - Type of public grievances received.
  - Number of press materials published/broadcasted in the local, regional, and national media.
  - Amount of Project's charitable investments in the local communities in the Project Area of Influence.

### **6.3. Reporting to the World Bank**

84. The project director with the support of social and environment specialist will share the progress and results of the stakeholder engagement activities to the World Bank quarterly and annually where Stakeholder related activities will be described broadly. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

**Annex - A: Sample 'Grievance Form' and Grievance Mechanism of the Project**

<b>Grievance Form: Pashchimanchal Gas Company limited</b>			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, what happened, when and where it happened, who is the perpetrator and how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like PGCL or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of PGCL official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Completion at PGCL Level</b>			
Final resolution (briefly describe)			
	Short description	Accepted ? (Y/N)	Acknowledgment signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			
3 <sup>rd</sup> proposed solution			



