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Rural Electrification Project

PAMIR ENERGY
НУР дар Боми Ҷаҳон

Stakeholder Engagement Plan

Khorog-Qozideh 63km 110kV Transmission Line, Tajikistan

APRIL 2019

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Acronyms and Abbreviations

Acronym	*Description*
CLO	Community Liaison Officer
E&S	Environmental & Social
EMF	Electromagnetic Field
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard of the 2018 World Bank ESF
GBAO	Gorno-Badakhshan Autonomous Region (VMKB in Tajik)
GRC	Grievance Resolution Committee (1 and 2)
GRM	Grievance Redress Mechanism
HSE	Health, and Safety, Social, and Environment
kV	Kilovolt
masl	Meters above sea level
NGO	Non-Governmental Organization
PAP	Project-Affected Person (or Project-Affected Party)
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
WB	World Bank

1. Introduction

1.1. Background

The World Bank is considering providing support to the Tajikistan Rural Electrification Project (TREP), whose purpose is to provide electricity access to selected settlements in Khatlon and Gorno-Badakhshan Autonomous Oblast (GBAO) regions of Tajikistan (Figure 2) and to improve the reliability of electricity supply in GBAO. The total value of the project is US$ 70.0 million, with US$ 20.0 million to be financed by the World Bank. TREP is part of the Risk Mitigation Regime (RMR) that is included in the upcoming World Bank Country Partner Framework for the Republic of Tajikistan for fiscal years 2019-2023.

Figure 1. Location of Gorno-Badashan Autonomous Oblast and Khatlon Province within Tajikistan

The TREP is being prepared under the World Bank's new Environment and Social Framework (ESF), which came into effect on October 1, 2018, replacing the Bank's Environmental and Social Safeguard Policies. Under the ESF, projects such as TREP must comply with ten Environmental and Social Standards (ESS) in investment project lending financed by the Bank.

TREP includes several components:

- Construction and operation of a run-of-river 10.5-megawatt (MW) Sebzor hydropower plant (Sebzor HPP) on the Shokhdara River and an associated 6.6/35kiloVolt (kV) substation.
- Construction and operation of a 63km 110kV transmission line between Khorog substation and a new 35/110kV substation near Qozideh.
- Off-grid solutions for electrification of 105 villages located in GBAO and Khatlon, comprising provision of electricity services to target settlements through construction of small hydro

(SHPP), solar and wind individual projects, and "last mile grid connections" which will involve constructing short distances of low-voltage distribution lines to connect currently unelectrified settlements in GBAO and to the national grid.

In addition to these projects that are part of the TREP, an associated 18km 110kV transmission line will carry power generated by the new Sebzor HPP to a new 110/35kV substation in Khorog. This component is being financed by the Swiss State Secretariat for Economic Affairs (SECO).

The World Bank is also providing financing for environmental and social assessments and other planning documentation needed for these projects to meet the requirements of the World Bank's ESF and other requirements related to environmental and social performance. The various assessments will include:

- *Environmental impact assessments*. The Sebzor hydropower project and the associated 18km transmission line will each be assessed in an Environmental and Social Impact Assessment (ES(A). Final feasibility studies are in preparation, and the environmental and social impacts of the projects have previously been subject to a desktop environmental and social evaluation and a full feasibility study. The off-grid solutions projects will have preliminary assessments in Environmental and Social Management Frameworks (ESMFs) that will establish criteria for future evaluations of individual electrification projects. The 63-kilometer transmission line is considered in a separate Environmental and Social Management Framework.
- *Stakeholder Engagement Plans*. Each project component will have a tailored program to engage affected people and other stakeholders, with the Sebzor HPP and 18km transmission line possibly sharing a single SEP since they are contiguous projects with many local common stakeholders.
- *Resettlement Policy Frameworks*. Each project component will require the temporary and permanent use of land that is currently allocated to other people and so will result in physical and/or economic displacement of some households. Each will require one or more separate Resettlement Action Plans in the future, but the principles and objectives of the program will be the same for all subprojects. For that reason, a single RPF has been prepared to cover all subprojects.

This report presents the ***Stakeholder Engagement Plan (SEP)*** for the 63km Khorog-to-Qozideh transmission line in GBAO and the Qozideh substation. Documents required for each component are identified in Table 1. .

Table 1. Environmental and social documentation for TREP and associated projects

	Sebzor HPP & substation	*18km Sebzor-to-Khorog 110kV t-line*	*63km Khorog-to-Qozideh t-line*	*GBAO off-grid solutions*	*Khatlon last-mile solutions*
ESIA	✓	✓			
ESMF			✓	✓	
SEP	✓		✓	✓	✓

Table 1. Environmental and social documentation for TREP and associated projects					
	Sebzor HPP & substation	*18km Sebzor-to-Khorog 110kV t-line*	*63km Khorog-to-Qozideh t-line*	*GBAO off-grid solutions*	*Khatlon last-mile solutions*
RPF	✓				

ESIA: Environmental & Social Impact Assessment
ESMF: Environmental and Social Management Framework
SEP: Stakeholder Engagement Plan
RPF: Resettlement Policy Framework
✓ indicates separate E&S document to be prepared to meet ESF and other applicable requirements
✓ identifies present document

Pamir Energy will be responsible for all the project components except the Khatlon last-mile solutions. Pamir Energy was formed in 2002 by the Aga Khan Fund for Economic Development (AKFED) in partnership with the Government of Tajikistan and the International Finance Corporation. Under a public-private partnership agreement with the Government of Tajikistan, the company has assumed the operational management of all power generation, transmission and distribution facilities of the Gorno-Badakhshan Autonomous Oblast (GBAO) of Tajikistan. The Khatlon electrification projects will be implemented by Barqi Tojik, the state-owned company responsible for power generation and transmission in other provinces of Tajikistan.

1.2. Project Summary

The project is in the southwestern part of GBAO, as shown on **Error! Reference source not found.**. The purpose is to improve the reliability of electricity supply to Ishkashim District. In the future, it is foreseen the new line will provide electricity supply to neighboring regions of Afghanistan, but that is not part of the present project.

The new 110kV line will run through rough and rocky mountain terrain along the Tajik and Afghan state border parallel to and near the Panj River (also spelled “Pyanj” or “Pyandzh” in English). The line will begin at a 35kV/110kV substation in the city of Khorog, pass through Roshtkala district, and end in a new 110/35kV substation near the village of Qozideh in Ishkashim district (Figure 3). The line will pass through or near 13 villages between Khorog and Qozideh. These villages have a total population of 5633 persons (798 households). The villages are identified in Table 2. .

The project is currently in advanced planning. Due to deterioration of the existing 35kV line, the first 10-kilometer section of the line has already been constructed (a total of 37 towers), and another five towers in avalanche areas have also been constructed, all financed by other donors. The World Bank financing will be used for construction of towers on the remaining 53km and the stringing of conductors (wires) on the towers that have already been constructed.

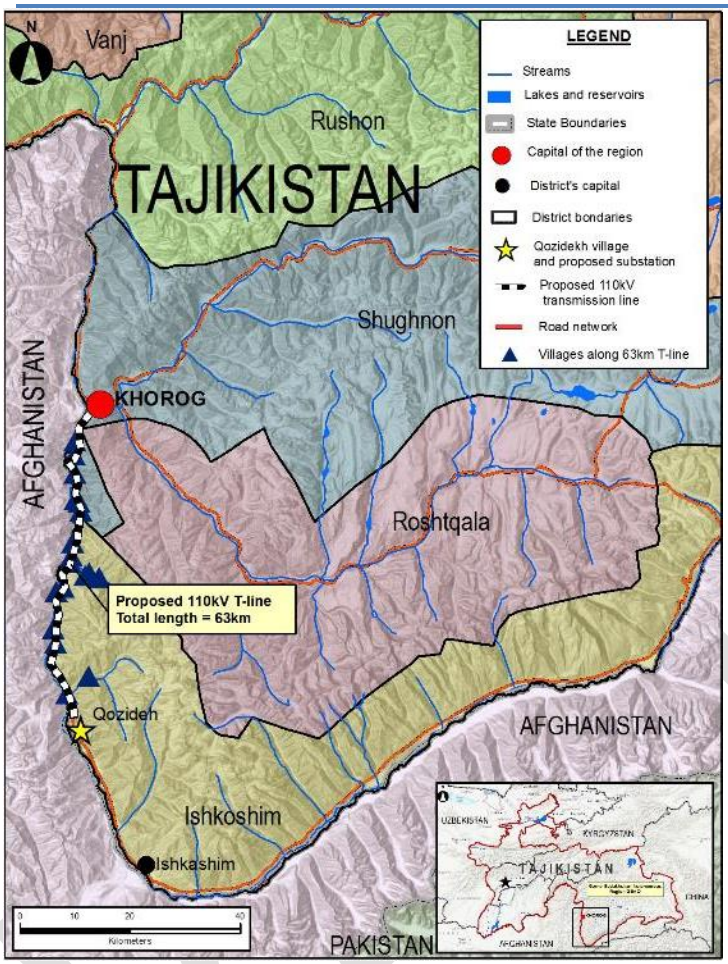

Figure 2. Location of the proposed transmission line

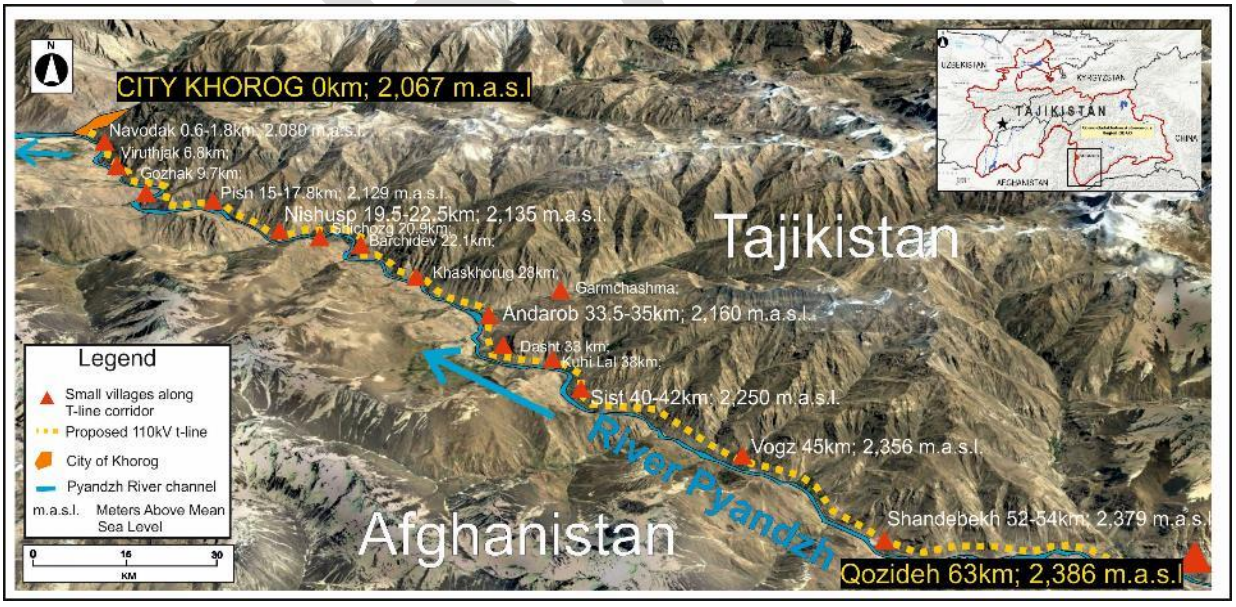

Figure 3. Villages along and near the transmission line corridor

Table 2. Villages along the corridor			
Distance from Khorog (km)	*Name*	*Number of households*	*Population*
6.8	Viruthjak	11	25
9.7	Gozhak	78	462
14.9	Pish	119	692
19.8	Nishusp	189	1585
20.9	Shichozg	42	235
22.1	Barchidev	31	210
28.3	Khaskhorug	42	283
30.6	Andarob	71	493
31.8	Dasht	22	264
37.5	Kuhi - La'l	39	285
38.7	Sist	46	328
45.3	Vozg	39	337
48	Shanbedeh	69	434
Totals		*798*	*5633*

There will be about 250 towers, of which 42 have already been constructed, as described above. The exact number of each type will be determined during final design, as will their locations. Pamir Energy intends to install the following types of towers, with examples shown on **Error! Reference source not found.**:

The project is currently in advanced planning. Due to deterioration of the existing 35kV line, the first 10-kilometer section of the line has been constructed (a total of 37 towers), and another five towers in avalanche areas have also been constructed.

It is planned to install the following types of towers, with examples shown on Figure 4:

- Four-legged steel lattice “angle” towers will be anchored in concrete foundations, with the base about 7.5 meters square (thus, corner foundations about 7.5 meters apart and a total “footprint” of 56.25 square meters) and adjustable heights ranging from 15 to 25 meters.
- Smaller four-legged steel lattice “suspension” towers for straight sections will also be anchored in concrete foundations and will be slightly smaller than the angle towers. These will occupy an area of about 5 meters square (or 25 square meters) and be about the same height as the angle towers.
- In areas where terrain does not allow four foundations for legs, three steel towers (poles) will each be anchored in concrete foundations and will be about 20 meters high. Each foundation

will be 1.5 meters square and up to 5 meters apart, thus occupying an area of up to about 30 square meters)

Figure 4. Examples of towers: angle tower at left, three suspension poles on uneven terrain at top right, and example of foundation at lower right

There will be about 250 towers, of which 42 have already been constructed, as described above. The exact number of each type will be determined during final design, as will their locations.

The construction period will last for two or three years, depending on the length of the construction season, which typically extends from April through November but will depend on weather. Towers will be provided by an international vendor, although it is likely they will ultimately be purchased and imported from China. One or two contractors, likely to be from Tajikistan, will be appointed to complete the construction. It is anticipated around 160-200 workers will be employed in construction, many or most of them from local communities. Construction activities for the transmission line will involve earthworks, including drilling and possibly limited blasting, concrete works to install foundations for tower legs and poles, transportation/storage of various pieces of towers and insulators, and tower assembly (erecting) works. Other than drills and hand tools, little or no mechanized equipment will be used, as steel parts of the towers will be carried by hand from trucks to locations and assembled in place. When towers are in place, conductors (wires) will be placed on the towers and energized. For the substation, about 150 workers will be employed in earthworks, concrete works, and installation of electrical equipment.

As noted, the transmission line corridor will run parallel to the Panj River. A two-lane road (designated as road RB 06(12R45)) also runs parallel to the river, and the existing 35kV line runs in part between the river and the road and in part inland of the road, sometimes several hundred meters higher than the road. One option considered by Pamir Energy is simply to place the new steel towers in the same locations as the existing wooden poles. However, the existing line passes near or through villages and would likely require some resettlement of households. Therefore, it is Pamir Energy's intent that the new towers be placed so the corridor does not pass near any occupied houses or other buildings, and so that it avoids orchards and trees as much as possible.

In addition, to reduce the impacts of construction, Pamir Energy will require the contractor to use little or no mechanized equipment other than rock drills and hand tools. Concrete, water, steel parts of the towers, and other materials will be carried by hand from trucks to the tower locations and the towers will be assembled in place. **Error! Reference source not found.** shows examples of the manual construction methods for the towers that have already been installed. At present, the 42 new towers carry 35kV conductors (wires). When towers are in place, 110kV conductors (wires) will be placed on the towers and energized.

1.3. Summary of potential environmental and social impacts

Potential environmental and social risks and impacts as a result of the project's planning, construction and implementation have been examined and addressed in an Environmental and Social Management Framework (ESMF). Key environmental and social considerations that were examined in the ESMF include:

- ***Environmental considerations:***
  - ***Air quality*** could be affected by dust from movement of vehicles and equipment on unpaved roads and from earthworks and open piles of spoil, and vehicles and equipment powered by combustion engines would emit pollutants. Impacts would be temporary and with proper controls would be very minor and localized.
  - ***Water quality*** in the Panj River could be affected due to erosion from tower sites and from spills of fuel or other hazardous materials. Contractors will be required to prevent erosion and spills, so there should be limited or no impacts.
  - ***Landscapes and views*** will be affected temporarily due to construction and maintenance activities and permanently by the presence of the towers and conductors. Given the presence of the existing transmission lines, this is not expected to be a major impact.
  - ***Soil erosion*** could occur from run-off of rainfall and snowmelt if land clearing and construction activities are not managed properly. The ESMF includes requirements to save topsoil and to prevent erosion.
  - ***Geomorphologic hazards.*** A significant portion of the t-line corridor lies within a high-risk zone for avalanches, debris flow, rockfalls, and earthquakes. The design will take this into account so as to minimize the risk of damage to the line in future, and construction will take steps so as not to cause earth movement.

- ***Plants and animals*** could be affected by disturbance during construction and by permanent use of their territories. Given the nature of the terrain, the small areas that will be affected, and the limited biodiversity, this will not be a significant issue.

➢ ***Worker health & Safety considerations:***

- Construction workers will be exposed to elevated risks of rockfalls and debris flows during construction period, and will be at risk of falls from heights and from working around trucks and machinery. Contractors will be required to develop and implement safety plans and to train all workers.

➢ ***Social and economic considerations:***

- ***Electromagnetic fields*** could cause health effects if workers or persons living in close proximity to the proposed project transmission line were exposed to high levels for long periods of time. However, levels will be low, workers will only be exposed for short periods, and no one will live near the line, so there will be no health effects.
- ***Physical or economic displacement*** could occur if houses or valuable property are located within a 45-meter protection zone under the line (20 meters from each conductor and 5 meters between conductors). It is Pamir Energy's intent to locate the substations and towers so no houses or other buildings are in the protection zone, and so the corridor will avoid agricultural and other valuable land as much as possible. If towers are located on agricultural land, those who use the land will be compensated for the land taken. As noted above, only small areas will need to be taken for towers. As for land under the line between the towers, agriculture and grazing will not be affected, except that tall equipment cannot be used and no buildings will be allowed in the protection zone. If that requires a change in land use, Pamir Energy will provide compensation. In addition, tall trees (those over 4 meters high) will need to be cut back to maintain at least a 6-meter clearance from the wires. Those who own or use trees will be compensated in such cases.

  Small amounts of land will be used for footpaths for workers to travel between the road and tower locations and possibly for equipment storage. Pamir Energy will compensate those whose land is used in this way. Also, if property or crops are damaged during construction or maintenance operations, or animals are injured or killed, their owners will be compensated at replacement value.

  Compensation requirements are set forth in a Resettlement Policy Framework that has been developed by Pamir Energy and in a future Resettlement Action Plan that will be developed by Pamir Energy and approved by the World Bank and the Government of Tajikistan.

- ***An influx of workers*** from outside the region could disturb local communities with disruptive behavior, use of local resources such as hospitals and schools, and introduction of disease. There will be relatively few outside workers, and all workers will be subject to a strict Code of Conduct, so there should be very little or no impact.

- ***Traffic accidents and inconvenience*** could be caused by increased project traffic on the two-lane road between Khorog and Qozideh. The contractor will be required to develop and implement a traffic management plan to minimize impacts and to repair any damage to the road that construction may cause.
- ***Local employment and income*** will be increased for up to three years due to seasonal employment of up to 100-150 workers from local communities.
- ***Power supply*** in the villages and in Ishkashim will be improved by replacement of the existing 35km line and ultimately Afghanistan villages will benefit from electrification.

1.4. Objectives of Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the construction and operation of the project. The SEP highlights the way Pamir Energy will communicate with people and stakeholder groups who may be affected by or interested in the project. The SEP outlines the ways in which Pamir Energy and contractors will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about Pamir Energy, the contractors, and the project itself.

While the project is not expected to cause any physical resettlement, and very limited permanent land acquisition, the involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the project.

2. Regulatory Context

2.1. Tajikistan Requirements for Stakeholder Engagement

Public participation in decisionmaking, which follows from the legislation of the Republic of Tajikistan and obligations under international agreements, is a new phenomenon in Tajikistan that requires the necessary legal regulation. The tradition of closed or limited information about decisions that affect the state of the environment have left a definite imprint on the attitude of society to environmental issues. More than twenty years ago, public participation in the decision-making process was difficult even to imagine. Now, there are a number of environmental and other requirements and acts that to some extent regulate public participation in the EIA process in Tajikistan. These acts include:

- The Environmental Protection Law establishes the right of citizens to live in a favorable environment and to be protected from negative environmental impacts (Article 12). Citizens also have the right to environmental information (Article 13) as well as to participate in developing, adopting, and implementing decisions related to environmental impacts (Article 13). The latter is assured by public discussion of drafts of environmentally important decisions and public ecological reviews. Public representative bodies have an obligation to take into consideration citizens' comments and suggestions.

- The Law on Environmental Expertise (art. 7) also provides the rights to citizens to conduct a Public Environmental Expertise (that is, a public environmental review). This law also empowers local authorities to facilitate public hearings, questionnaires, and referendums regarding planned activities that are subject to ecological expertise. On 17 July 2001, Tajikistan acceded to the 1998 Aarhus Convention, the provisions of which have priority over domestic law that stipulates the rights for Public Environmental Expertise. The element of public participation in the EIA procedure is described in detail in the Procedure (Order) for Conducting an EIA of 2018. Public participation procedures are envisaged for all categories of projects, although in practice they are mainly applied to major projects. The Procedure (Order) for Conducting the EIA of 2014 changed the focus and timing of public discussions, as the previous version (2006) provided for the participation of the public at an early stage of the process (i.e., after submitting a draft declaration of intent to the competent environmental authority) and it was indicated that comments and suggestions from the public be taken into account in drafting the technical task for carrying out the EIA. In fact, this ensured the participation of the public at the stage of defining the range of EIA tasks (scoping). The Procedure for Conducting the EIA of 2018 assumes public discussions only after the preparation of the EIA report by the project developer.

2.2. World Bank Requirements for Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by the 2018 ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks.

- "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."
- "Borrowers 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.
- "Borrowers will engage in meaningful consultations with all stakeholders. Borrowers 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) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- "The Borrower 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."

Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

3. Summary of Previous Stakeholder Engagement

Prior and during the preparation of the SEP, Pamir Energy conducted interviews with community members in Khorog and in 3 villagers in Qozideh (out of the 8 project-affected communities). Pamir Energy plans to organize more community meetings in late March and April 2019 in the remaining communities along the proposed transmission line corridor. The main topic of the community meetings this far has been to share information, communicate with the local population and identify their needs and interests. **Error! Reference source not found.** identifies project stakeholders who were consulted prior to preparation of SEP and Figure 5 shows some of the groups met.

Table 3. Consultations in potentially affected villages

Full name	*Location*	*Date of Birth*	*Affiliation*
Ismoilova Oistamokh (f)	Vogz village, Qozideh Jamoat, Ishkashim district	12/03/1943	Head of community. Pensioner
Muzofirbov Mavlonzar (m)		01/01/1952	Teacher at school. Pensioner
Miravazahonov Shahboh (m)	Shandebeh village, Ishkashim district	15/05/1947	Engineer. Pensioner
Muborakshoeva Bibisulton (f)		29/11/1949	Dressmaker. Pensioner
Ismoilbekov Maram (m)	Qozideh village, Ishkashim district	11/09/1947	Worker
Asadulaev Rachab (m)	Qozideh village, Ishkashim district	08.08.1944	Teacher
Abduraimov Abduraim (m)	Village Sist, Qozideh, Ishkashim district	27.09.1950	Pensioner

Davlatov Okimbek (m)	Village Sist, Qozideh, Ishkashim district	25.12.1951	Security guard.
Odinaeva Asparmo (f)	Nishusp village	19.03.1955	Pensioner
Manasurova Olabegim (m)	Nishusp village	16.08.1941	Pensioner. Former farmer
Inronbekov Sjodmon (m)	Pish village	17/03/1950	Construction worker
Mirzoeva Soadat	Pish village	24/08/1953	Accountant

Figure 5. Selected consultations with residents near the transmission line

All people who have been consulted to date expressed positive opinions about the proposed transmission line and about the larger World Bank Rural Electrification Project. All respondents supported the rural electrification project due to its high social and economic value to local communities. Everyone interviewed had knowledge of Pamir Energy and its activities. Nearly everyone noted that the most significant social and economic problems in the region are high unemployment rates and low income. A number of stakeholders interviewed specified that the best communication method with village residents and community members would be through Pamir Energy electricity inspectors, who they see on a regular basis (once a week or so) when inspectors visit households to read electricity consumption gauges. Every interviewee expressed interest in participating in further meetings, consultations, and public hearings for the project.

4. Stakeholder Identification, Analysis and Communication Methods

4.1. Scoping consultations

During the period of February 18 – March 10, 2019, Pamir Energy organized and carried out a series of scoping meetings and consultations with institutional stakeholders[1]. The scoping consultation process involved identification of key project stakeholders in Dushanbe and GBAO, meetings with state and local authorities in Dushanbe and Khorog (Houkumat, Jamoat), meetings with regional NGOs and academic research institutes and universities in Dushanbe and Khorog (e.g., University of Central Asia and Pamir Biological Institute in Khorog). The main objectives of scoping consultations included:

- To identify and verify interests of project stakeholders and to establish working dialogues between Pamir Energy and the stakeholders
- To disclose information about the project
- To understand stakeholders' expectations about the project and their respective levels of interest in continued communication and participation in future Pamir Energy activities associated with the proposed project.
- To receive feedback, comments, and concerns from stakeholders about the project and on prospective regional electricity supply schemes in general
- To obtain feedback on major environmental, social and economic problems in Roshtkala and Ishkashim districts and overall across GBAO.

Table 4. and Table 5. identify key project stakeholders who were consulted in February and March 2019.

Table 4. Scoping meetings with stakeholders in Dushanbe

Date	*Name of Unit*	*Position*	*Full name*
21 February	Renewable Energy Center	Director	Kabutov Kurbondjon
21 February	Physics and Mathematics Institute of the Academy of Sciences of the Republic of Tajikistan	Deputy Head of Department	Boturov Kodir
21 February	BARS Consulting	Founder	Alikhon Latifi
23 Fevruary	Tajik Technical University, department «Communication networks and switching systems»	Senior lecturer	Bahdavlatov Asratbek
24 February	NGO «Civil society and environment»	Director	Alidodov T.
25 February	NGO Peshsaf	Director	Ruslan Shukurov
25 February	Office of Youth Ecological Center	Director	Yuri Skochilov
25 February	Tajik Technical University	Senior lecturer	Ganiev Zokirjon

[1] Consultations and discussions dealt with the World Bank's full Tajikistan Rural Electrification Project, which includes the Sebzor hydropower plant, off-grid connections in GBAO and Khatlon, and this 63km transmission line.

Table 4. Scoping meetings with stakeholders in Dushanbe			
Date	*Name of Unit*	*Position*	*Full name*
25 February	Ministry of Health and social protection	Head of the Department of Management and Food Safety, State Sanitary-Epidemiological Service Management and the Ministry of Health and Social Protection	Kandakov Ahliddin
25 February	Committee on environment protection under the Government of Tajikistan	Head of international affairs sector	Salimov Muzaffar
26 February	Ministry of Energy and water resources	Head of Investment Department	Manuchehr Safarzoda
26 February	Barqi Tojik	Chief Engineer	Rahmatov Bakhtiyor
26 February	Ministry of Energy and Water Resources	Head of Department for Analysis and Monitoring of the Electric Power Industry Directorate, Ministry of Energy and Industry of Tajikistan	Tilloev Vays

Table 5. Scoping meetings with stakeholders in Khorog			
Date	*Name of Unit*	*Position*	*Name*
25 February	Government	The Governor	Yodgor Fayzov
	Committee of Environmental protection	Head of committee	Mulkamon Nazaraliev
	Inspection Department of Environment Protection Control	Head of department	Aynulloev Shirin
26 February	University of Central Asia – Environmental Department	Professor Research fellow	Royce Slydly Shodigul Mamadyorbekova
	Forest Protection Department	Engineer	Kambarov Hokim
		Forestry officer	Kosumbekov Khushvaqt
	Association of Entrepreneurs and Mountain Farmers «Milal-Inter»/Aarhus Center	Chairman\Director	Boymamad Alibakhshov
27 February		Field coordinator	Haqrizo Nurmamadov

Table 5. Scoping meetings with stakeholders in Khorog			
Date	*Name of Unit*	*Position*	*Name*
	CAMP 'Tabiat', Forest Protection Department	Specialist	Abdulmajidov Abdulaziz
28 February	Pamir Biological Institute	Former Director	Dovutsho Navruzshoev
		Ornithologist	A.G. Abdulnazarov

4.2. Project-affected persons

4.2.1. People affected by land acquisition

Perhaps the key category of people who may be affected by the project would be those who may lose land they current use or other assets, including houses, buildings, trees, or other valuable property. In addition, some people may lose access to common resources due to the project's use of the land.

For the entire project, less than two hectares of land will be needed for permanent use, including up to about 1.4 hectares for the transmission line towers (250 towers x 7.5 meters square per tower) and about 0.36 hectares for the substation in Qozideh (30 meters x 60 meters). In addition, very small amounts of land will be used temporarily by workers who travel by foot from the road to the tower locations and the contractor will need small areas (up to about 0.5 hectares in total) for storage and temporary use during construction.

Tajikistan norms allow no buildings within 20 meters of an energized 110kV line, so a corridor 45 meters wide is designated as a protection zone – 20 meters from the conductor on each side and five meters between the conductors. No one will be allowed to remain in a house within the safety zone. However, if Pamir Energy is successful in avoiding all houses and buildings, as was the case of the first 42 towers and is currently anticipated for the remaining ones, no one will need to be resettled. If they are not successful, households who live in the corridor will have new land allocated to them and Pamir Energy will construct a new house (and/or other buildings) or provide compensation so affected people can rebuild on the new land.

When towers are on agricultural or other productive land, Pamir Energy will compensate the people who are currently using the small plots of land that will be taken for towers. Agriculture can continue under the line itself so no compensation will be paid unless crops are damaged in some way or other uses are limited by the presence of the line. If trees grown for timber, firewood, or fruit/nuts need to be cut to avoid interference with the energized conductors, their owners will be compensated sufficiently to pay for replacement trees and for lost production. All land acquisition and compensation will meet the requirements of Tajikistan law and the World Bank. The resettlement and compensation program is described in detail in the Resettlement Policy Framework.

People owning or using land in the corridor will thus be a high-priority stakeholder group who will require active and regular engagement as well as being provided accurate information, in particular about compensation and livelihood restoration schemes and employment opportunities.

4.2.2. Other people residing in the project areas

A second key category of PAPs will be people who live along the transmission line route who may be disturbed by project traffic, noise, dust, or other construction impacts, and who may also benefit from employment opportunities.

4.2.3. Village representatives (Jamoats)

A third category of important PAPs will be representatives of Jamoats. Head of Jamoats typically have established day-to-day communication lines with all neighboring villages and smaller communities so it will be important that they have information about the project, including employment status and upcoming activities.

4.3. Other interested parties

4.3.1. Other interested parties - external

Table 6. summarizes the key categories of other interested parties and their potential interest in the project.

Table 6. Other interested parties - external

Other interested parties	*Interest in the project*
Ministries and Government agencies (State level) – Committee on environment protection under the Government of Tajikistan – Ministry of Energy and water resources	Overall: To ensure project compliance with Tajik legislation (e.g. energy policies, environmental performance) during construction and operation – Responsible for protected areas and proposed protected areas that are or may be created in the vicinity of the project – Promote Tajik energy security and development – Possible involvement in some project-related mitigation measures
Local (region and district scale) government departments and villages (Jamoats)	– Protect the rights of inhabitants in the project area – Represent local communities and PAPs – Receive and address any feedback and grievances from them – Responsible for land allotments and compensation under Tajik law
Nongovernmental organizations (local, regional, national, international)	Monitor project performance in areas of their respective concerns Consult with Pamir Energy and governments as needed
Business and workers' organizations	Interest in procurement and supply chain, potential environmental and social impacts as well as community health and safety
Other project developers reliant on or in the vicinity of the project (e.g. associated facilities) and their financiers (e.g. ADB, EBRD, KfW, IFC)	May require operation of the project to enable the export of power Can help Identify interactions and cumulative impacts with other proposed developments
Press and media	Inform people and authorities in the project area and the wider public about project implementation and planned activities

Table 6. Other interested parties - external	
Other interested parties	*Interest in the project*
General public, tourists, jobseekers	Interest in the general socioeconomic impacts of the project, both adverse and beneficial
Academic institutions (universities, think tanks, schools)	– Potential concerns regarding environmental and social impacts – Potential educational/outreach opportunities to increase awareness and acceptance of the project

4.3.2. Other interested parties – Internal

Internal interested parties with stakes in the project include the management and staff of Pamir Energy, their future contractors and subcontractors, service providers, local vendors, and suppliers.

4.4. Disadvantaged / Vulnerable individuals or groups

Disadvantaged or vulnerable individuals or groups are those who may potentially be disproportionally affected by the project and/or less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project. For purposes of this project, the following people and households are considered vulnerable:

- Households headed by women, including those whose husbands or partners are working abroad and do not make significant contributions to the household's income or welfare
- Elderly households (headed by pensioners or elderly people)
- Households with disabled persons
- Households in extreme poverty. There is no threshold for poverty in Tajikistan, so this will be determined on a case-by-case basis during studies conducted as part of the Resettlement program.

As described in the Resettlement Policy Framework, vulnerable people and households will be eligible for special allowances and compensation.

4.5. Summary of stakeholder interest in and influence over the project

Table 7. summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above. Categories having "high level of interest" and "high ability to influence/impact the project" will require regular and frequent engagement, typically face-to-face and written, and several times per year. Categories with medium interest or medium influence will require regular engagement (e.g. every half-a-year), typically through written information. Other will require infrequent engagement (e.g. once a year), typically through indirect written information (e.g. mass media)

5. Stakeholder Engagement Program

5.1. Planned stakeholder engagement activities

Stakeholder engagement activities will need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. Table 8. shows the stakeholder engagement activities Pamir Energy will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance. Methods to be used to engage stakeholders are described in section 5.2.

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Table 7. Level of interest and influence over the project

Level of interest in project	*Ability or likelihood to influence or impact the project*		
	High	*Medium*	*Low*
High	– State Ministries, Committees and Government Agencies – Project-affected persons	– Regional government (Khoukumat in Khorog) – Regional Government (Committees) – Jamoats and villages – Other people residing in project areas	
Medium	– NGOs – Press and media	Businesses and workers' organizations	– Academic institutions – General public, tourists, jobseekers
Low			Other project developers and donors

5.2. Engagement methods to be used

5.2.1. Public/community meetings

Prior to other activities, at the time of disclosure of the Environmental and Social Management Framework, Resettlement Policy Framework, and this SEP, Pamir Energy will organize project launch meetings in Khorog and in each of Jamoats. With the support of Jamoat leaders, another meeting will be held in each village and Khorog at the beginning of construction activities that will affect the villages, and then quarterly during construction seasons (approximately twice per year). Meetings will be open house events where Pamir Energy (and/or contractors) will present information and people will be invited to make comments and express any concerns. If there is sufficient interest, separate meetings will be held for women, at which women will also be the primary representatives of Pamir Energy. Following the disclosure meeting, comments will be considered in the development of final ESMF, RPF, and SEP. After the other meetings, Pamir Energy will follow up with Jamoat leaders and with stakeholders who expressed concerns about any E&S topic or the project as a whole.

5.2.2. Mass/social media communication

Pamir Energy will appoint a community liaison officer (CLO) during each construction season (about six or seven months per year) in order to remain in close communication with PAPs, village leaders, and with contractor supervisors.

Meetings will be advertised in two newspapers “Asia Plus” and “Badakhshan". In addition, meetings will be announced in Pamir Energy’s monthly published magazine and on Pamir Energy’s website, and notices will be placed local notice-boards at Pamir Energy offices and in district & village offices. Notices may also be distributed by Pamir Energy’s electricity inspectors, who frequently visit each electrified house.

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Table 8. Planned stakeholder engagement activities by project phase

Stage	*Target stakeholders*	*Topic(s) of engagement*	*Method(s) used*	*Location/frequency*	*Responsibilities*
STAGE 1: PROJECT PREPARATION (PROJECT DESIGN, SCOPING, RESETTLEMENT PLANNING, ESMF/RPF/SEP DISCLOSURE)	**Project Affected Parties:** – People potentially affected by land acquisition – People residing in project area – Vulnerable households	– ESMF, RPF, SEP, RAP disclosure – Land acquisition process – Assistance in gathering official documents for authorized land uses – Compensation rates and methodology – Project scope and rationale – Project E&S principles – Resettlement and livelihood restoration options – Grievance mechanism process	– Public meetings, separate meetings for women and vulnerable – Face-to-face meetings – Mass/social media communication (as needed) – Disclosure of written information: brochures, posters, flyers, website Information boards or desks - In Jamoats – Grievance mechanism	– In Jamoats for disclosure of ESMF, RPF, SEP – In Jamoats at beginning of construction that would affect the area – Survey of PAPs in affected villages – Communication through mass/social media – Throughout RAP development as needed	– Pamir Energy HSE team – CLO – Specialists responsible for land acquisition – RAP consultant
	Other Interested Parties (External) – Khukumat (Khorog) – Jamoats – Representatives in villages	– ESMF, RPF, SEP, RAP disclosure – Land acquisition process – Identification of land plots and uses – Resettlement and livelihood restoration options (if needed) – Project scope, rationale and E&S principles – Grievance mechanism process	– Face-to-face meetings – Joint public/community meetings with PAPs	– Throughout RAP development as needed – Project launch meetings in Jamoats – Quarterly meetings in affected villages and Jamoats – Disclosure meetings in Jamoats and Khorog	– Pamir Energy E&S Team & management – CLO – Specialists responsible for land acquisition – RAP consultant

Table 8. Planned stakeholder engagement activities by project phase

Stage	*Target stakeholders*	*Topic(s) of engagement*	*Method(s) used*	*Location/frequency*	*Responsibilities*
	Other Interested Parties (External) – Press and media – NGOs – Businesses and business organizations – Workers' organizations – Academic institutions – National Government Ministries – Local Government Departments – General public, tourists, jobseekers	– ESMF, RPF, SEP, RAP disclosure – Grievance mechanism – Project scope, rationale and E&S principles	– Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable as needed) – Mass/social media communication – Disclosure of written information: Brochures, posters, flyers, website – Information boards or desks in Jamoats – Grievance mechanism – Notice board for employment recruitment	– Project launch meetings in Jamoats – Meetings in affected villages and Jamoats as needed – Communication through mass/social media (as needed) – Information desks with brochures/posters in affected villages (continuous)	– Pamir Energy HSE team – CLO
	Other Interested Parties (External) – Other Government Departments from which permissions/clearances are required – Other project developers, donors	– Project information scope and rationale and E&S principles – Coordination activities – Land acquisition process – Grievance mechanism process – ESMF/RPF/SEP disclosure	– Face-to-face meetings – Invitations to public/community meetings	– Disclosure meetings	– Pamir Energy HSE team – CLO
	Other Interested Parties (Internal) – Other Pamir Energy staff – Supervision Consultants – Contractor, sub-contractors, service providers, suppliers, and their workers	– Project information - scope and rationale and E&S principles – Training ESMF/ESMP requirements and other sub-management plans – Grievance mechanism process – E&S requirements	– Face-to-face meetings – Trainings/workshops – Invitations to public/community meetings	As needed	– Pamir Energy HSE team – CLO

Table 8. Planned stakeholder engagement activities by project phase

Stage	*Target stakeholders*	*Topic(s) of engagement*	*Method(s) used*	*Location/frequency*	*Responsibilities*
STAGE 2: Construction and mobilization activities	**Project Affected Parties:** – People potentially affected by land acquisition – People residing in project area – Vulnerable households	– Grievance mechanism – Health and safety impacts (EMF, community H&S, community concerns) – Employment opportunities – Project status	– Public meetings, open houses, trainings/workshops, – Separate meetings as needed for women and vulnerable – Individual outreach to PAPs as needed – Disclosure of written information: brochures, posters, flyers, website Information boards or desks - In Jamoats – Notice board(s) – Grievance mechanism	– Quarterly meetings in affected villages during construction season – Communication through mass/social media as needed – Notice boards updated weekly – Brochures in local offices	– Pamir Energy HSE team – CLO – Supervision and RAP consultants – Contractor/sub-contractors – NGOs/trainers
	Other Interested Parties (External) – Governmental committees for land use and compensation – Jamoats and representatives in villages	– Project scope, rationale and E&S principles – Grievance mechanism – Project status	– Face-to-face meetings – Joint public/community meetings with PAPs	– As needed (monthly during construction season)	– Pamir Energy HSE team – CLO – Supervision and RAP consultants – Contractor/sub-contractors
	Other Interested Parties (External) – Press and media – NGOs – Businesses and business organizations – Workers' organizations – Academic institutions – National Government Ministries – Local Government Departments – General public, tourists, jobseekers	– Project information - scope and rationale and E&S principles – Project status – Health and safety impacts – Employment opportunities – Environmental concerns – Grievance mechanism process	– Same as for PAPs	– Same as for PAPs	– Pamir Energy HSE team – CLO

Table 8. Planned stakeholder engagement activities by project phase

Stage	*Target stakeholders*	*Topic(s) of engagement*	*Method(s) used*	*Location/frequency*	*Responsibilities*
	Other Interested Parties (Internal) – Other PEC Staff – Supervision Consultants – Contractor, sub-contractors, service providers, suppliers and their workers	– Project information: scope and rationale and E&S principles – Training on ESMF/ESMP requirements and other sub-management plans – Worker grievance mechanism	– Face-to-face meetings – Trainings/workshops – Invitations to public/community meetings	Daily, as needed	– Pamir Energy HSE team – Supervisors
STAGE 3: Operation and maintenance	**Project Affected Parties** – People residing in project area – Vulnerable households	– Satisfaction with engagement activities and GRM – Grievance mechanism process – Electromagnetic fields – Damage claim process	– Outreach to individual PAPs – Pamir Energy website	Meetings in affected Jamoats and villages (as needed/requested)	Pamir Energy HSE team
	Other Interested Parties (External) – Press and media – NGOs – Businesses and business organizations – Workers' organizations – Academic institutions – Local Government Departments (Khuokumat, Jamoats) – General public, tourists	– Grievance mechanism process – Issues of concern	– Grievance mechanism – Pamir Energy website – Face-to-face meetings	As needed	Pamir Energy HSE team & management

5.2.3. Communication materials

Written information will be disclosed to the public in a number of ways. Initially, the draft ESMF, RPF, and SEP will be disclosed in English and Russian. In addition, Pamir Energy will prepare brochures on a number of topics, including the project as a whole, on the land acquisition and compensation process, and on the grievance mechanism. These brochures will be available at meetings and will also be posted on bulletin boards in Jamoat offices and on information boards. Pamir Energy will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance. The website will also provide information about the grievance mechanism.

5.2.4. Information Desks

When construction is about to be undertaken in any of the Jamoats, and while construction is ongoing there, an information desk will be set up to provide local residents and affected people with information on stakeholder engagement activities, construction updates, contact details of the Pamir Energy Community Liaison Officer, and grievance management. Pamir Energy will set up these information centers, which may be staffed by contractors. They will be set up in village centers or other easily accessible places where people can receive and share information about the project. The brochures mentioned above will be available at these information desks.

5.2.5. Grievance redress mechanism

In compliance with the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues, and this will be in addition to the normal Jamoat-and village-level processes that are available to citizens. Dedicated communication materials (specifically, a GRM brochure or pamphlet) will be developed to help local residents become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be posted in each village and at contractor offices and camps, and Pamir Energy will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. Pamir Energy's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by Pamir Energy. If that is not successful in resolving grievances, they will be referred to a committee at the Jamoat level.

The mechanism is described in detail in Chapter 6 below, which includes a form that can be used to submit grievances. Grievances may be submitted anonymously, but in that case it cannot be known if the complainant is satisfied with the resolution. Grievance Mechanism will have a special window, and the protocols thereof, to address SEA/SH in such a way so as to ensure privacy, dignity and full justice to the affected persons.

5.2.6. Project tours

At appropriate points during the construction phase, if there is sufficient interest, Pamir Energy may organize site visits or demonstration tours for selected stakeholders from media organizations or local governments

5.2.7. Citizen/PAP perception survey

A perception survey examining citizen's experience and feedback about the project will be carried out twice during the project's lifecycle: once near the end of the first construction season and once during the second season. Results of these surveys will be reviewed carefully to identify refinements or changes in project methods and procedures that may be needed to reduce impacts or improve efficiency.

5.2.8. Trainings and workshops

Finally, trainings on a variety of social and environmental issues will be provided to Pamir Energy and contractor staff and possibly to interested government or nongovernment service providers. Issues covered could include such topics as the worker code of conduct and the worker grievance mechanism. Pamir Energy may also provide training to residents on various topics, including efficient use of electricity, electrical safety, and other relevant topics.

5.2.9. Vulnerable groups

Pamir Energy will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of the Community Liaison Officer will help to ensure proactive outreach to all population groups, and they will make a special effort to engage with those identified as vulnerable or disadvantaged. If necessary, Pamir Energy will provide transport to public meetings for vulnerable people, and will also deliver brochures and informational material to such households.

5.3. Information disclosure

The Pamir Energy website (https://www.akfusa.org/our-work/pamir-energy/) will be used to disclose project documents, including those on environmental and social performance. This will begin with disclosure of this draft SEP and the draft ESMF and RPF. Besides the draft disclosure documents (and the final documents in future), project brochures and updates will be posted. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be posted on the website. In addition, the site will provide details about the Grievance Redress Mechanism and contact details of the Community Liaison Officer. Pamir Energy will update and maintain the website regularly, at least quarterly.

6. Grievance Redress Mechanism

Project-affected-people and any other stakeholder may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to the resettlement and compensation program.

- Strengthen accountability to beneficiaries, including project affected people.

The GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. External stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the project, including the resettlement and compensation program. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. A separate mechanism will be available to Pamir Energy and contractor employees, who are internal stakeholders.

Pamir Energy will be responsible for managing the stakeholder GRM, but many or most grievances are likely to result from actions of the construction contractors and so will need to be resolved by the contractors themselves, with Pamir Energy oversight. Typical grievances for transmission line projects could include issues related to:

- Land acquisition and compensation
- Construction damages to property, crops, or animals
- Traffic
- Environmental impacts such as erosion
- Nuisances such as dust or noise
- Worker misbehavior.

The GRM will be in place and operational well before Pamir Energy begins construction activities and will function until the completion of all construction activities and beyond, till the contractor's defect liability period ends. Initial compensation, for land and property needed for the project, will be completed before construction begins. People who reside near the line and others who may be affected will be informed, in meetings and with brochures, of the GRM's purpose, functions, procedures, timelines and contact persons. Additional measures will be taken to inform those who are determined to be eligible for compensation.

The project GRM will include three successive tiers of extra-judicial grievance review and resolution: the first tier will comprise Pamir Energy E&S team including Community Liaison Officer; second Grievance Resolution Committee (GRC-1) includes, apart from PEC staff, the concerned Jamot; and third, GRC-2 will include PEC senior Officers and many Jamots. Grievance Mechanism will have a special window to address issues related to SEA/SH such as to ensure privacy and dignity of the complainant. This will be developed based on the SEA/SH guideline issued by the World Bank in October 2020.

The GRM will include three successive tiers:

- The first tier will be the Pamir Energy E&S team, including the Community Liaison Officer. They will deal quickly with issues that can be quickly resolved, and would always involve direct communication with the person(s) who submitted the grievance.
- The second tier will be a Grievance Resolution Committee (GRC1) that includes

representatives of Pamir Energy and of the complainant's village and Jamoat. The GRC1 will deal with issues that could not be resolved in the first tier.

- The third tier will be a Grievance Redress Commission (GRC2) that included one or more senior Pamir Energy managers and one or more Jamoat and/or village leaders. GRC2 will resolve issues that could not be resolved by GRC1.

Grievances would be handled as described in the following subsection.

6.1. Grievance resolution process

Information about the GRM will be publicized as part of the initial disclosure consultations in the participating Jamoats and villages. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the Pamir Energy website (https://www.akfusa.org/our-work/pamir-energy/)

The overall process for the GRM will be comprised of six steps, as shown on Figure 6 and described below. This builds on the way grievances are typically managed, which is illustrated in Figure 7

Figure 6. Feedback and GRM Process

Source: Agarwal, Sanjay and David Post. 2009. Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects – Part I. SDV. World Bank.

- ***Step 1: Uptake.*** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, jamoat, project, and Pamir Energy offices) and at project sites, and by mail, telephone, and email.
- ***Step 2: Sorting and processing.*** Complaints and feedback will be compiled by the Community Liaison Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the HSE Department for processing and resolution.

The Department will assign one individual to be responsible for dealing with each complaint, including following through within Pamir Energy and with the complainant to arrive at a resolution, with the goal to resolve complaints within 15 days of receipt.

- ***Step 3: Acknowledgement and followup.*** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. If complaints are not resolved within 15 days, the responsible person will provide an update about the status of the complaint/question to the complainant and again provide an estimate of how long it will take to resolve the issue. In addition, the HSE Department will report to the General Director every two weeks on grievances that have remained unresolved for 30 days or more.

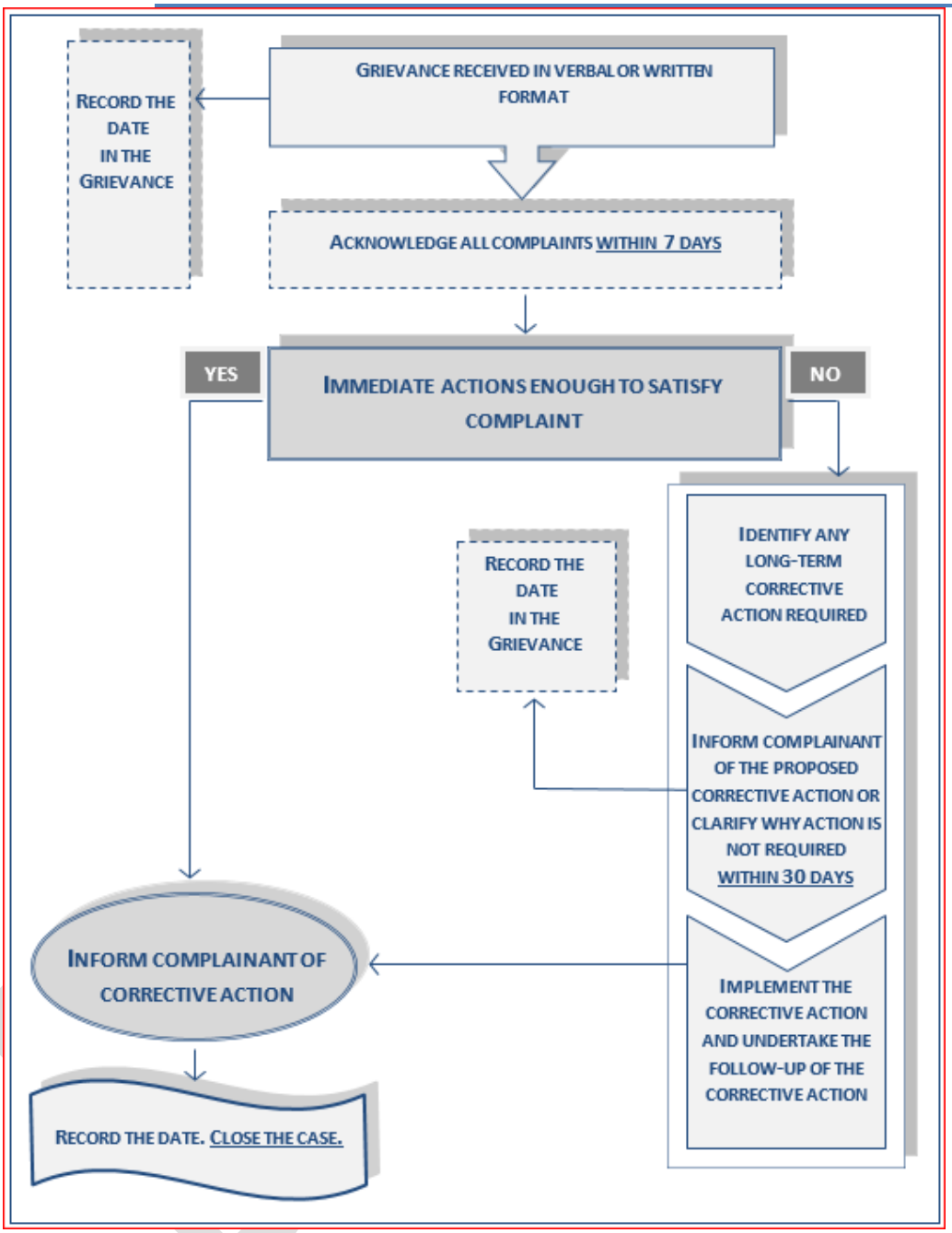

Figure 7. Typical grievance resolution process.

- ***Step 4: Verification, investigation and action.*** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional compensation or assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that

many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

- ***Step 5: Monitoring and evaluation.*** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The HSE Department will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- ***Step 6: Providing Feedback.*** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through avenues afforded by the Tajikistan legal system. On a monthly basis, the HSE Department will report to the General Director on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

Pamir Energy will be responsible for carrying grievances through all six steps. Step 4 (Verify, Investigate, and Act) could involve interviews of the aggrieved party, workers, or other stakeholders; review of records; consultation with authorities; and/or other fact-finding activities. If the grievance cannot be resolved to the satisfaction of all parties, it will be referred to GRC1, who would retrace Step 4 as needed. The steps following the initial investigation and proposed solution would proceed as follows:

- Determination of proposed resolution or referral to second tier:
  - If resolution is proposed: referral to E&S manager for review and approval (including refinements). Once approved, responsible person would communicate resolution to complainant and refer to corporate management for implementation.
  - If referred to second tier, GRC1 would consider facts determined by initial review and conduct such other fact-finding as needed, including interviews of complainant and others if necessary.
- GRC1 recommends resolution or refers to GRC2:
  - If resolution is proposed: referral to Pamir Energy for implementation, including communication to complainant.
  - If referred to third tier, GRC2 to meet and discuss facts as determined by initial tiers and make determination of proposed resolution.
- GRC2-recommended resolution: referred to Pamir Energy for communication to complainant and implementation of recommended actions (if any)

- Complainant would be asked to acknowledge acceptance (or rejection) of the resolution.
- Pamir Energy would then implement actions that are part of the resolution (if any).

If a person who submits a grievance is not satisfied with the resolution at the first or second tiers, he or she may request it be elevated to the next tier. If they are not satisfied with the ultimate resolution, they may pursue legal remedies in court or pursue other avenues as described in section6.6. Throughout the entire process, Pamir Energy will maintain detailed records of all deliberations, investigations, findings, and actions, and will maintain a summary log that tracks the overall process.

6.2. Grievance processing

Anyone who believes they are eligible for compensation can submit a grievance:

- By completing a written grievance form that will be available (a) in the Jamoat and in the villages crossed by the line, (b) at Pamir Energy's offices in Khorog and on their website, and (c) from CLOs or other members of the HSE Department. An example of a grievance registration form is provided in Annex 1.
- By contacting the Pamir Energy Community Liaison Officer or other member of the Pamir Energy HSE Department team, either by telephone or in person. In addition, grievances may be communicated to contractor supervisors or to Pamir Energy electrical inspectors, who will be briefed on receiving and reporting complaints. Grievances received verbally will be recorded by the Community Liaison Officer on a grievance registration form and logged into the Grievance Register. A copy of the logged grievance will be given to the complainant, giving them the opportunity to alert Pamir Energy if the grievance has not been noted down correctly.

Pamir Energy will explain to local communities the possibilities and ways to raise a grievance during consultation meetings organized in each village when this draft SEP and other draft documents are disclosed and then at quarterly meetings thereafter. The GRM procedures will be disclosed through the project's website and will also be described in a brochure or pamphlet made available in Jamoat administration buildings.

The Pamir Energy Community Liaison Officer team will be responsible for logging and tracking grievances. As noted above, one person will be assigned responsibility for investigating and recommending resolution to each grievance, or to recommend referral to GRC1.

Information to be recorded in the grievance log will include name and contact details of the complainant and a summary of the grievance and how and when it was submitted, acknowledged, responded to and closed out. All grievances will be acknowledged within 7 days and resolved as quickly as possible. If there has been no resolution within 30 days, the person assigned responsibility for the grievance will contact the complainant to explain the reason for the delay. On at least a monthly basis, a summary of grievances and resolutions will be provided to the Pamir Energy General Director. A generic flow chart for registering and processing grievances is shown as **Error! Reference source not found.** below. The status, number,

and trends of grievances will be discussed between the project team and Pamir Energy senior management during meetings held at least monthly and more frequently as needed.

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after any required corrective measures have been successfully implemented. When a proposed solution is agreed by the complainant, the time needed to implement it will depend on the nature of the solution. Once the solution is being implemented or is implemented to the satisfaction of the complainant, the complaint will be closed out and acknowledged in writing by both the complainant and Pamir Energy.

In certain situations, it may not be possible to reach a satisfactory resolution. This could occur if a complaint cannot be substantiated or is proved to be speculative or fraudulent. In such situations, Pamir Energy's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. It is also possible that a complainant will not be satisfied with the proposed resolution. In such cases, if Pamir Energy cannot do more, the complainant will be asked to acknowledge refusal of the proposed resolution in writing. Pamir Energy will then decide whether to implement the resolution without the agreement of the complainant and the complainant will decide whether to pursue legal remedies.

6.3. Grievance Logs

As noted previously, the HSE Department will maintain a grievance log. This log will include at least the following information:

- Individual reference number
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)
- Details of the complaint, feedback, or question/her location and details of his / her complaint.
- Date of the complaint.
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution
- Date when proposed resolution was communicated to the complainant (unless anonymous)
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
- If necessary, details of GRC1 and GRC2 referrals, activities, and decisions
- Date when the resolution is implemented (if any).

6.4. Monitoring and reporting on grievances

Details of monitoring and reporting are described above. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the HSE Department. To ensure management oversight of grievance handling, the Internal Audit Unit will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

6.5. Pamir Energy Point of Contact

The point of contact regarding the stakeholder engagement program:

Description	*Contact details*
Name	Asligul Mamadatoeva
Address:	75 Gulmamadova Street 736000 Khorog, GBAO, Tajikistan
E-mail:	mavluda.mamadatoeva@pamirenergy.com
Telephone:	+992 35 222 23 10

Information on the project and future stakeholder engagement programs will available on the project's website and will be posted on information boards in the villages crossed by the line. Information can also be obtained from Pamir Energy in Khorog.

Six-monthly E&S reports that document the implementation of the Stakeholder Engagement Plan (SEP) will be disclosed on the project website and made available in the Jamoats or at the village heads houses.

6.6. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, Russian, Tajik, or Shugne, although additional processing time will be needed for complaints that are not in English.

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA
- Through the World Bank Tajikistan Country Office in Dushanbe: 48 Ayni Street, Business Center "Sozidanie", 3rd floor, Dushanbe, Tajikistan; Tel: +992 48 701-5810.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible.. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s, and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

Annex 1: Example Grievance Form

Grievance Form			
Grievance reference number (to be completed by Pamir Energy):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: ☐	By phone: ☐	By email ☐
Preferred language	☐ Tajik	☐ Russian	☐ English
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, 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 Pamir Energy or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website ☐	email ☐	By hand ☐
	In person ☐	By telephone ☐	Other (specify) ☐
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of Pamir Energy person assigned responsibility			
Resolved or referred to GRC1?	☐ Resolved	☐ Referred	If referred, date:
Resolved referred to GRC2?	☐ Resolved	☐ Referred	If referred, date:

Completion			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1st proposed solution			
2nd proposed solution			
3rd proposed solution			