

Southern Chattogram and Kaliakoir Transmission Infrastructure Development Project

Stakeholder Engagement Plan (SEP)

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Stakeholder Engagement Plan

1. Introduction

Power Grid Company of Bangladesh Limited (PGCB) under Ministry of Energy, Power and Mineral Resources (MoEPMR) has taken up a project for construction of substations and transmission lines named “Southern Chattogram and Kaliakoir Transmission Infrastructure Development Project” for reliable power supply funded by the Government of Bangladesh (GoB) and Asian Infrastructure Investment Bank (AIIB). Stakeholder consultations are important processes through which a two-way dialogue is created between the PGCB and the stakeholders. Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and/or the ability to influence its outcome, either positively or negatively. They can comprise individuals, communities, social groups, organizations, etc. It is often observed that the poor and the marginalized are often ignored either due to the fact that they are unaware or do not have a forum to voice their opinion. 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. AIIB’s Environmental and Social Framework (ESF) 2016 (Amended 2019) also emphasizes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients to achieve this objective. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. By identifying and consulting all stakeholders, especially the poor and the vulnerable, it is essential to ensure that the Project meets the need of all sections of the people. This SEP has been developed as per findings of Stakeholder Engagement during preparation of Resettlement Plan (RP), Environmental and Social Impact Assessment (ESIA), Labor Management Plan (LMP) and Gender Based Violence (GBV) prevention plan.

2. Objectives

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 of sub-stations (SS) and Transmission Lines (TL), other project activities, and operation of the proposed projects. The SEP outlines the ways in which the project will engage national stakeholders, labors, and contractors, and provide them with a mechanism through which people can raise concerns, provide feedback, or make positive and negative complaints about the project(s) themselves.

The involvement of the local population and interested stakeholders 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 proposed project. 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 environmental and social risks identified in a project. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays.¹ In addition, the plan assists in managing stakeholder expectations, which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively with stakeholders to support project interests. The key objectives are:

¹Pollet., T (2014), A Strategic Approach to Early Stakeholder Engagement

- ✓ Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s) including all affected households and interested groups including women in the community;
- ✓ Providing information in advance of consultation activities and decision-making;
- ✓ Disseminating information in ways and locations that make it easy for stakeholders to access it;
- ✓ Respect for local traditions, languages, timeframes and decision-making processes;
- ✓ Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- ✓ Inclusiveness in representation of views, including women, vulnerable and/or minority groups
- ✓ Processes free of intimidation or coercion;
- ✓ Clear mechanisms for responding to people's concerns, suggestions, and grievances;
- ✓ Incorporating feedback into Project or program design and reporting back to stakeholders.

This 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 on the project proposal and design.
- ✓ Encourages stakeholder's 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, and interested parties.
- ✓ Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.
- ✓ Suggest formation of Grievance Redressed Committees at different levels so that people can raise their concern without any fear.

In addition, this SEP 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 AIIB proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

3. Project Description and Location

To distribute uninterrupted and quality power in Chattogram, Cox's Bazar, and Gazipur area new sub-stations and associate transmission lines (TLs) are going to be constructed in that area. Major components of the Project are-

Table 1: Project Interventions and Locations

Name of Substations	Land Size (acre)	SS Type	Required Bays	Associated Transmission Lines	Length (Km)
230/132/33kV SS: Anwara 2x250/350 MVA (230/132kV) 2x80/120 MVA (132/33kV) (Future 400 kV Provision)	20	GIS	230kV: LB=8; TB=2; BCB=1 132kV: LB=2; TB=4 33kV: TB=2	Anwara-Cox's Bazar (N) 230kV double circuit line (Initially Charged at 132kV)	105
132/33kV GIS Substation: Cox's Bazar 3x80/120 MVA (Future 230 kV Provision)	10	GIS	132kV: LB=8; CBB=2; TB=3; Spare=1; BCB=1 33kV: TB=3	Anwara-Cox's Bazar (N) 230kV double circuit line (Initially Charged at 132kV) LILO of Dohazari-Cox's Bazar 132kV four circuit transmission line	1.09
132/33kV GIS Substation: Teknaf 2x80/120 MVA	5	GIS	132kV: LB=2; TB=2; BCB=1 33kV: TB=2	Cox's Bazar to Teknaf 132 kV double circuit transmission line	73.10
230/33kV GIS Substation: BHTC 2x125/140 MVA	5	GIS	230kV: LB=2; TB=2; BCB=1 33kV: TB=2	Existing Kaliakair SS to BHTC 230kV double circuit transmission line (230kV Bay Extension at Kaliakair: 2 Nos.)	4.88
4 Nos.	40			Total (Transmission Line)	184.07

4. Potential Impacts and Risks

Four proposed sub-stations require total 40 acres of land. Out of 40, 35 acres are private land which require land acquisition, and the remaining 5 acres is owned by Bangladesh Hi-tech Park Authority (BHTPA). BHTPA following the policy of World Bank has carried out a SIA and an abbreviate RP respectively for BHTC. According to the report, they paid applicable compensation to the affected people after receiving the land from T&T Board. For construction of substations a total of 233 households (644 persons) will be affected. Besides, 17 sharecroppers and 69 wage earners will also lose their income due to acquisition of land.

A total of about 763 towers will have to construct for laying the transmission lines, of which 223 are angel towers and 540 are suspension towers. Out of 763 towers, 420 will be constructed on agricultural land and 343 on the non-agricultural land, resulting crops of agricultural land may be damaged. For each angel and suspension tower, 225 sqm (15m X 15m) and 100 sqm (10m X 10m) have been considered for 230 kV and 132kV transmission lines respectively. Hence, a total of 18.07 acres of agricultural land will be affected.

As per Census, a total of 248 HHs will be affected for the construction of substations and associated transmission lines. Among them 233 HHs will lose their agricultural land and 15 HHs due to construction of transmission lines as they are under the RoW. The overhead transmission lines will include agricultural land, settlement areas, rivers, etc. Any physical displacement and economic losses due to construction of TLs, will be compensated according to entitlement proposed with the RP of this project.

Affected households (land owners, lessees, sharecroppers) mainly cultivate rice and vegetables on that land. Thus, will lose their work/employment, and wages/income, which will reduce earning scope of

affected people and will have an impact on their income and livelihoods. In fact, the lands earmarked for substations are fertile land cultivated by farmers in several seasons of the year and planned to construct 'future houses' by land-filling as they are located closer to the main roads. Because of the rerouting, the line will pass through Government owned/ fallow land and therefore number of sharecroppers or affected people remain almost unchanged, but if any issue arises during the implementation period, the issues will be resolved by the PD Office/ Consultant/ Contractor accordingly based on the Check survey reports as per the GoB and AIB guidelines and the Stakeholder Engagement Plan will be duly updated.

Regarding the Displaced Rohingya People, the nearest distance is boundary of Camp 01E is about 225-meter, Camp 07 about 330-meter, Camp 08E about 227-meter away from proposed transmission line. Cox's Bazar to Teknaf Highway is located between the Camps and proposed transmission line. It was found that about 6.10km of transmission line (AP 47 to AP 59) will pass with the periphery of Kutupalong Rohingya Camps. So, construction of transmission line may not have any negative impact on Rohingya Camps. It is expected that there will be no direct negative impacts on the displaced Rohingya People (DRP) due to construction of TL. However, to avoid any unexpected impacts during construction on the DRP and construction workers, project has prepared a Labor Management Plan (LMP) and ESIA.

There is a risk of engaging Rohingya refugees as labor by the contractor. Moreover, among the refugees, about 50% are child and they tend to engage themselves with the construction related activities of the project. Project construction labors and Rohingya female may be at risk of gender-based violence (GVB), since there about 50% are Rohingya women and girls. Risk of fire by the construction activities of the project may affect camps. Noise due to civil work during construction phase can affect the community. However, a labor management plan (LMP) is being prepared by the project and LMP guides that following existing guidelines and practices, Rohingya people may not be engaged in construction work.

Due to the potential pollution, impacts on natural habitat, health and safety issues associated with construction activities, livelihood impacts on the neighborhood, impacts on gender and labor influx as the result of the construction of SS and TLs, the Project is assigned a Category A as it is likely to have significant adverse environmental and social impacts that are irreversible, cumulative, diverse or unprecedented.

5. Previous Stakeholder Engagement Activities

In order to assess stakeholder needs, expectations, perceptions, and choices, and to ensure their rights and voices, a two-fold consultation processes was carried out during the survey. Thus, Consultations were conducted firstly with both the primary and secondary stakeholders. Later, affected persons of different occupations were consulted through FGDs. Three consultations were carried out at three different locations of the project areas. Public Consultation Meeting 1 (PCM-1) was carried out at Parki Bazar, Anwara, PCM-2 was carried out at Bangla Bazar, Cox's Bazar Sadar and PCM-3 was carried out at Sutrapur, Kaliakair. The total number of participants in three SCMs was 63.

Table 2: Schedule and number of participants of SMCs

Sub-stations Area	Meeting place	Mauza	Upazila/District	Date	Time	No. of participants
Anwara Sub-station	Parki Bazar adjacent to the proposed substation of Anwara	Dudkumar	Anwara, Chattogram	27/07/2020	05:00 pm	29
Cox's Bazar Sub-station	Bangla Bazar adjacent to the proposed substation of Cox's Bazar	Khurulia	Cox's Bazar Sadar, Cox's Bazar	23/08/2020	02:30 pm	14
Bangabandhu high-tech Park	Sutrapur, Kaliakair	Sutrapur	Kaliakair	21/07/2020	12:00 pm	20
Total						63

The specific issues and concerns within the primary stakeholders were obtained from the FGDs. Six (6) FGDs were conducted at different locations of the project areas with different occupational groups including businessman, farmer, teacher, day labor, transport labor, service holder, mason and shopkeeper. All the FGDs were conducted near the substations area. A total of 52 participants from different groups were attended in six (6) FGDs.

Table 3: Meeting schedule and number of participants of FGDs

Sub-stations Area	Meeting place	Mauza	Upazila/District	Date	Time	No. of participants
Anwara Sub-station	Gobadia, Barashat	Dudkumra	Anwara, Chattogram	08/09/2020	11:00 am	7
Cox's Bazar Sub-station	Purbo Muktarpur	Khurulia	Cox's Bazar Sadar, Cox's Bazar	10/07/2020	10:00 am	7
Cox's Bazar Sub-station	Banglabazar	Banglabazar	Cox's Bazar Sadar, Cox's Bazar	23/08/2020	02:45 pm	12
Teknaf Sub-Station	Ali Khali, Hnila	South Hnila	Teknaf, Cox's Bazar	17/08/2020	05:00 pm	7
Bangabandhu Hi-Tech City	Sutrapur, Kaliakair	Sutrapur	Kaliakair, Gazipur	21/09/2020	11:00 am	12
Bangabandhu Hi-Tech City	Bagchapai, Kaliakair	Chapai	Kaliakair, Gazipur	21/09/2020	2:40 am	7
Total						52

The details and/or summary of consultations for different areas held with issues raised or discussed and suggestions provided by the respective primary stakeholders are presented in 4.

Table 4: Details of Consultations Held for the Project

Major Issues	Issues and concerns raised	Response from the project
Awareness about the proposed project	<ul style="list-style-type: none"> Most of the participants are not aware of the proposed substations. Only local government representatives are aware because the former consulting firm informed them regarding the substation. The participants asked why this substation is required. In Anwara, Teknaf and Cox's Bazar, the participants opined that agricultural land will be affected due to construction of substations and some of the farmers will lose their total agricultural land. They also asked about the compensation package. 	<ul style="list-style-type: none"> Project will bring many positive benefits to the local communities. The project will improve and stabilize the power supply. Moreover, if the electricity supply increases, it will create more livelihood opportunities and employment for people. Compensation will be paid as per Acquisition and Requisition of Immovable Property Act-2017 and policy of AIIB's ESS 2
Benefits of the Project	<ul style="list-style-type: none"> The participants expected that transmission lines will contribute to improved village and household power supply, reduce load shedding, stable supply of electricity to irrigate crop cultivations, uninterrupted power supply at night for children's studies, development of industries and commercial centers and employment for our unemployed people in civil works; Ensure incessant electricity supply with full voltage in the project area; Setting up new industrial area along with small and medium industry using the generated power; Construction of road, industry; Employment opportunities will be increased to some extent. Permanent employment for educated youth at substations specifically affected households as per their skill. Lack of working opportunity can create frustration among the affected people. This may lead them to committing crimes and may make the society unstable. 	<ul style="list-style-type: none"> The economic and social development will be increased. New industries will be constructed due to availability of power supply. Local people will get job in that industries and economically benefitted. Due to construction of substation new investment in different sectors will be increased as available power supply is mandatory for establishing any development entities; Incessant electricity supply with full voltage in the project area will be ensured; Installation of substation will invite allied infrastructure e.g. road, industry; which would impact indirectly on the land price. The price of land will rise likely due to enhanced economic activity; PGCB will negotiate with the construction contractors to place their priority in local labor in recruiting labor teams for civil works.
Loss of land, livelihoods and incomes and compensation	<ul style="list-style-type: none"> Some landowners are not entirely dependent on the land that will be acquired, and they live elsewhere either in Chattogram, Dhaka or abroad. Their lands are cultivated by tenants or sharecroppers. These landowners are willing to sell their 	<ul style="list-style-type: none"> Compensation for all losses caused to the APs will be paid at replacement cost irrespective of the title of the AP as per the provisions in the ARIPA, 2017 and in compliance with AIIB's ESS 2 policy; If there is a gap between statutory compensation and the replacement cost,

Major Issues	Issues and concerns raised	Response from the project
	<p>land so that they can get rid of the tenants and sharecroppers. Others are exclusively dependent on the land that will be acquired for substations, and they will lose a stable source of food for their families, livelihoods and income. Landowners losing their land for substations should be paid a higher compensation over and above the mouza rate to enable them to purchase alternate agricultural land;</p> <ul style="list-style-type: none"> • Transmission towers will restrict the land use. Tractors and machinery cannot be used. Productivity of the land will decrease. Civil works will cause crop losses and restrict farmers' access to their cultivated areas for several seasons; • Removal of fruit-bearing and timber trees will reduce incomes; • Project should consider allocating alternate land of similar quality to people who lose their land and specifically to the leaseholders and sharecroppers who are exclusively dependent on acquired land for their livelihoods and incomes. Affected people (land owners, lessees, sharecroppers) mainly cultivate rice and vegetables in the affected land and thus, will lose their work/employment, and wages/income which will reduce earning scope of affected people and will have an impact on their income and livelihoods; • The lands earmarked for substations are fertile land cultivated by farmers in several seasons of the year and planned to construct 'future houses' by land-filling as they are located closer to the main roads. Land acquisitions will adversely affect the activities and expectations of the landowners. Project should consider selecting alternative land; • What is the procedure for landowners who live abroad to claim their compensation 	<p>the gap will be bridged by PGCB based on assessments and recommendations of the Property Assessment and Valuation Committees (PAVC) to be appointed by PGCB;</p> <ul style="list-style-type: none"> • Compensation for crop losses will be paid for a period of one year and taking into consideration the loss of incomes and investments of the farmers. Farmers will also be allowed to cultivate underneath the transmission tower base areas; • Compensation will be paid for the trees to be removed. Also, tree owners will be allowed to retain the timber from the trees; • Compensation will be paid at replacement cost enabling people to purchase alternate land. The project will assist the APs to find alternative land either for outright purchase or leasing. Leaseholders and sharecroppers will be compensated for their crop and income losses. Furthermore, they will be assisted to find alternate land; • Project has tried to avoid/minimize resettlement impacts and particularly the residential areas, and none of lands earmarked for substations are within the residential areas. The location is proposed by a team of professionals considering the engineering and technical requirements. However, community concerns over the land will be further reviewed by PGCB; • The landowners who live abroad can appoint a power of attorney on their behalf. Or else the compensation money will remain in DC's account and the eligible parties can claim the money whenever they are available by showing evidence in support of their claims and ownership.

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Major Issues	Issues and concerns raised	Response from the project
Avoidance and safeguards	<ul style="list-style-type: none"> • Transmission lines should avoid traversing public places like schools, mosques, graveyards, madarasa, markets etc. as well as residential dwellings of the people; • Transmission lines and towers can cause possible electrocution, accidents, fires and damages to trees and crops particularly during natural disasters like heavy rains, lightening, storms and winds; • Route plan should be developed avoiding elephant movement path as there are 19 elephants in that area and they use path near Ramu Cantonment; • The authority should develop route plan considering Rohingya Camp areas; 	<ul style="list-style-type: none"> • Route plan of transmission lines has been developed avoiding traversing public places like schools, mosques, graveyards, madarasa, markets etc. as well as residential dwellings of the people. Installation of transmission towers will avoid residential areas and other public spaces. If unavoidable, project will provide compensation at replacement cost and other rehabilitation and restoration assistance. PGCB ensures that transmission lines do not cause population displacements. People can live in the same places if distance between the roof of their structures and the transmission conductors are maintained at 7-8 meters; • PGCB will ensure that all required safety measures are followed by contractors during substation construction and PGCB officers during its operations; • Route plan has been developed avoiding elephant movement path near Ramu Cantonment; • Route plan has been developed considering Rohingya Camp area and minimum 225 meters away from the Rohingya Camp areas.
Risks and hazards	<ul style="list-style-type: none"> • Sound and air pollution will increase during construction of the substation; • Risk of accidental occurrence might be increased beside the substation area; • Risks associated with cultivation of land under this high-power line, particularly during the rainy season; • Transportation of construction material can cause traffic congestion, dust and noise emissions; • Landfilling for substations can disturb the drainage systems and would adversely affect the rest of the lands, water logging, floods, etc. • Construction work of the transmission lines should not damage utility services and our water sources and pumps; • Civil works of the project will lead to influx of migrant labor teams; their possible misconduct and engagement in sexual harassment of women; drug 	<ul style="list-style-type: none"> • Necessary safety measures such as erecting bamboo sheds over the built structures and fencing off the construction sites will be adopted by the contractors during conductor stringing. Civil works will be scheduled to avoid cultivation seasons, and peak periods for other livelihood activities; • Contractors will be obliged to avoid traffic congestion and follow health and safety guidelines to control dust emissions and noise generation. PGCB officers will monitor the performance of the contractors and compliance with safeguards requirements; • The final engineering designs will study the drainage systems and necessary measures would be incorporated to avoid environmental hazards; • No utility services or water sources will be affected. If affected, project will restore them at its own cost within a reasonable time frame;

Major Issues	Issues and concerns raised	Response from the project
	<p>peddling and abuse, human trafficking, etc.</p> <ul style="list-style-type: none"> • Compensation payments should not be delayed. Middlemen interfering with compensation process and seeking bribes should be avoided. It should be a trouble-free process for APs. 	<ul style="list-style-type: none"> • PGCB and the contractors will endeavor to minimize labor influx and place priority in local labor. Awareness raising programs will be conducted for labor teams. It will be a mandatory requirement for the contractors to enforce a code of conduct for the labor teams. PGCB will establish a grievance redress mechanism (GRM) to facilitate any affected/aggrieved parties to report their grievances/complaints and seek resolution within a reasonable time frame; • PGCB together with DC will ensure that compensation is paid on due time and before taking possession of land. Compensation will be paid directly to the landowner/ claimant through a cheque.

6. Stakeholder identification and analysis

In order to ensure effective engagement and open, frequent and honest dialogue with local communities and other key stakeholders, a stakeholder engagement plan is designed throughout the life of the Project. This plan is to be developed and implemented in order to identify stakeholder and their issues of concern, establishes the methods for consultation, and provides a specific action plan for stakeholder engagement throughout the life of the Project.

Table 5: Stakeholder Assessment

Key Stakeholders	
Project Proponent	: Power Grid Company of Bangladesh (PGCB)
Related organizations/ Local government	: DOE, DOF, DAE, RHD, BR, BWDB, Department of Fisheries, Ward Commissioner/UP member (male and female)
Local people	: Businessmen, Service holder, Farmers, Day Labor, Teacher, Transport Worker, Homemaker, Shopkeeper, etc.
Non-Governmental Organizations	: Nishorgo, CODEC, IUCN
Engagement Methods	
ESIA phase	: – Organizing consultation meetings by inviting key stakeholders above at draft scoping report and draft ESIA report
Pre-construction/ Construction phase/ Regular operation Phase	: – Regular communication with local community through personal contact; – Meeting with the representative of village on the quarterly basis; – Participatory meeting with villagers; – Interpersonal Interview with villagers.
Information Disclosure	
ESIA phase: Pre-construction/ Construction phase/ Regular operation Phase	: – Disclosures of draft ESIA report once cleared by line ministry and AIIB.
– Grievance mechanism process and complaints register	

All phase	:	<ul style="list-style-type: none"> – Receiving complaints and opinions from the public on regular basis through the engagement method; – Meeting with the representative of villagers; – Participatory meeting with villagers.
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All the stakeholders have been primarily categorized into two categories that have been identified as:

- ◆ **Primary Stakeholders:** include people, groups, institutions that either have a direct influence on the project or are directly impacted (positively or adversely) by the project and its activities i.e. the grass-root stakeholders, such as project affected persons and general public including women and people with physical disabilities residing in the project area (for the proposed project: people living in the project area particularly the RoW) and the Rohigya community has been considered as primary stakeholders for this project though they may not be affected by the project directly;
- ◆ **Secondary stakeholders:** are those that have a bearing on the project and its activities by the virtue of their being closely linked or associated with the primary stakeholders and due to the influence, they have on the primary stakeholder groups.
- ◆ Apart from categorization, the stakeholders have also been classified in accordance with the level of influence they have over the project as well as their priority to the project proponent in terms of importance.

The stakeholders have been classified in accordance with the level of influence they have over the Project as well as their priority to the Project proponent in terms of importance. The influence and priority have both been primarily rates as:

- ◆ **High Influence/Priority:** This implies a high degree of influence of the stakeholder on the Project in terms of participation and decision making or high priority for Project proponent to engage that stakeholder.
- ◆ **Medium Influence/Priority:** This implies a moderate level of influence and participation of the stakeholder in the Project as well as a priority level for Project proponent to engage the stakeholder who are neither highly critical nor are insignificant in terms of influence.
- ◆ **Low Influence/Priority:** This implies a low degree of influence of the stakeholder on the Project in terms of participation and decision making or low priority for Project proponent to engage that stakeholder.

Based on the above attributes, the following table delineates the stakeholders identified for the Project and their analysis.

Table 6: Stakeholder Mapping for the Project

Stakeholders	Category of stakeholder	Brief profile	Influence status	Basis of Influence Rating
Management				
Local Community	Primary	Primarily includes adjacent community to the substations and TL	Medium	<ul style="list-style-type: none"> • No major restrictions around the Project site • Project bring development to the area • Increase in employment opportunities and preference in job during construction phase

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Stakeholders	Category of stakeholder	Brief profile	Influence status	Basis of Influence Rating
				<ul style="list-style-type: none"> Improvement in electrical supply and infrastructure in the area Minimize impact
Directly Project affected people	Primary	Those who will be affected directly due to construction of SS and TLs	High	<ul style="list-style-type: none"> May be displaced due to land acquisition and construction of SS Vulnerable HHs, Wage labors and sharecroppers will be economically affected
Unidentified HHs	Primary	These hh were not traceable at the time of project survey/census	High	<ul style="list-style-type: none"> If these HHs are not identified or do not agree to provide land for construction of SS, this may cause delay in project implementation or may cause alternative location may require to consider
Power Grid Company of Bangladesh (PGCB)	Secondary	PGCB is the Project proponent own a controlling stake of 100% in the Project	Highest	<ul style="list-style-type: none"> Primary Project proponent Responsible for construction and operation of this Project Primary financial beneficiaries Responsible for all the Project related risks and impact liabilities
Community				
Regulatory/Administrative Authorities & Agencies				
Department of Environment (DOE)	Secondary	The Department of Environment is the primary government regulatory authority for Environmental protection in Bangladesh.	High	Responsible for environmental clearance, management and monitoring including necessary compliance throughout the Project lifecycle
Department of Forest (DOF)	Secondary	The Department of Forest is the primary government regulatory authority for protection of forest in Bangladesh.	High	Responsible for forest protection, conservation and management and provide permit for cutting trees for width clearing of TL during construction phase
Ministry of Railway	Secondary	Ministry of Railway is the primary government regulatory authority for construction and maintenance of railways in Bangladesh	High	Responsible for the construction of new railway and maintenance of existing. Provides permit while use the right-of-way and/or crossing (overhead and underground) power and gas transmission and distribution lines, etc.

Stakeholders	Category of stakeholder	Brief profile	Influence status	Basis of Influence Rating
Roads and Highways Department (RHD)	Secondary	Roads and Highways Department is the primary government regulatory authority for the construction and repair of roads and highways in Bangladesh	High	Responsible for the construction of new roads and highways, and maintenance of existing. Provides permit while use the right-of-way and/or crossing (overhead and underground) power and gas transmission and distribution lines, etc.
Other Regulatory & Permitting Authorities	Primary		High	<ul style="list-style-type: none"> Agencies required for obtaining permits and licenses for operation of the Project Primary involvement during operation phases
Political Administration				
Upazila (sub-District Level) Political Administration	Secondary	Elected representatives of people at sub-district level for a fixed tenure	Medium	<ul style="list-style-type: none"> Key linkage between the community and the PGCB
Union/Ward leaders & local representative	Secondary	Elected representatives at Union/Ward level i.e., village level for a fixed tenure	Medium	<ul style="list-style-type: none"> Plays important role in providing public opinion and sentiment on the Project Empowered to provide consent and authorization for establishment of Project on behalf of the community

7. Stakeholder Engagement Program

Stakeholder engagement becomes a successful exercise when proper and participatory communicative methods are used. This ensures that the stakeholders are kept engaged and well informed of the Project development at every stage. A combination of communicative methods is usually used to engage with the stakeholders. To determine which option is best suited to the various stakeholders, a benefit analysis of each option can be carried out. The communicative methods are:

- General Information consisting of the Project's various activities, the operation stage and impacts that might arise shall be made available:
 - on information board of Chattogram, Cox's Bazar and Gazipur district, Anwara, Teknaf, Cox's Bazar Sadar and Kaliakair upazila, Barasat, Jhilwanja, Hnila and Sreefaltali union Offices of the project areas
 - on information board of PGCB
 - on PGCB's website
 - in local newspaper
- Detailed information including documents like ESIA report; Environment, Health & Safety and Social Policy, Environment Management Plan, RP, LMP including environmental decisions shall be in hard copies and disseminated to:
 - district, upazila, union/ward council Offices of the project areas

- Project Site Offices
- Electronic version of these documents will be made available at PGCB’s website.
- In addition to this, a host of tools and techniques can be adopted to engage with the stakeholders in a transparent and accountable manner. Below a list of the tools and techniques which can be adopted are mentioned:
 - Public Meeting: Public meeting should be arranged to disclose information on a large scale involving the stakeholders of a particular village/union regarding project sites. A schedule of the meeting can be circulated well in advance and discussions can involve feedback session from the stakeholders. The meeting can be conducted in the premise of the adjacent school of the Project for proximity and familiarity purposes. Once the meeting concludes, minutes of the same should be kept as a record with the site office and a copy given to the ward member of the respective area. Schedules of future meetings should be discussed and finalized so that the stakeholders can gauge the seriousness of the Project proponent in continuing the engagement process.
 - Focus Group Discussion (FGDs): FGDs are important when gauging with a particular group of stakeholders on issues related to the Project activities. FGDs should be conducted to understand the needs, perceptions, concerns of the group. The discussion will give space for the participants to voice their concerns and suggestions. The moderator of the FGD should be impartial in his/her view and should encourage everyone present to participate in the discussion. Records of the FGDs should be maintained and updated regularly.
 - Participatory Workshops: Participatory workshops are meetings which enable local people to analyze, share and enhance their knowledge to plan, manage and evaluate development Projects and program. Visual aids—such as mapping, videos, illustrations, timelines, card sorting and ranking, Venn diagrams, seasonal calendar diagramming and body maps can be used in participatory workshops to engage participants and capture knowledge. Participatory Workshop is an effective means of getting participants to reflect on issues and their own personal experiences. These workshops also pay particular attention to group dynamics and breaking down distinctions between ‘uppers’ – those with power, standing, influence, etc. within a community – and ‘lowers’ – those with less power, influence and standing within a community. To initiate such a workshop, an expert familiar with participatory tools and conducting such workshops shall be engaged.
 - Participatory Rural Appraisal (PRA) Techniques: PRA techniques are usually adopted to emphasize local knowledge by enabling local people to make their own appraisal, analysis and plan. PRA uses group animation and exercises to facilitate information sharing, analysis and action among stakeholders. This process can be useful when the Project proponent initiates any developmental activities in the area and uses the local knowledge to plan and strategize so that they feel responsible for delivery of the objectives.

The consultation with the stakeholders will be conducted by PGCB, RP implementing NGO/firm and all relevant project officials in collaboration with the Environment, Project Director/Site In charge at the site level. Any grievances from the community relating to any issues that might arise from the Project activities will be managed by the PGCB or its consultant, and/or RP implementing NGO/firm based at the Site Office.

The stakeholders will be informed in advance of the planned Project activities. The development of the facilities will be based on the ESIA procedures and mitigation issues once an ESIA study has been completed. Information on the summary of the ESIA draft will be disclosed to the public in the Bangla for easier accessibility.

Consultations with the direct internal stakeholders will be provided separately from this document. At a minimum, communication will involve meetings, information boards announcements and an Intranet system to apprise the direct employees of PGCB regarding the procedures of emergency response system, incident/accident reporting, grievance redressal mechanism, HR Policies and Procedures, welfare measures etc. In addition, communication of general employment conditions, company's code of conduct for work site, EHS concerns, use of Personal Protective Equipment's (PPEs), information and awareness about the requirements of Bangladesh labour laws and minimum wages, working hours, grievance redressal, retrenchment process etc. should be conducted with workers engaged with contractors.

Project related information will be posted on the informational boards at the site office as well as at the Corporate Level. Information on the Project milestones will be published in advance on the company's website to be available for the public and non-governmental organization to comprehend the attitude of the external stakeholders. In addition, PGCB will publish information on the Project in the local newspapers.

In turn, if any issues are raised by the stakeholders, the Project proponent management comprising of the Grievance Committee at the Site Level will respond accordingly in the shortest possible time. Details of which have been provided in the Grievance Redressal Mechanism Plan developed for PGCB.

The responsibility for the SEP implementation will be held by the Social Specialist based at the Head Office of PGCB in Dhaka. He will be supported by the Director (HR & Administration - Corporate Level), EHS Manager (from contractor site) and the Community Liaison Officer (both at the Site Level) of the Company.

8. Description of Engagement Methods

Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. In case of international stakeholders' engagement, advance invitation will be sent or be connected through social media such as Skype, Viber, and WhatsApp etc. Due to Covid-19, tools and methods will be different-using digital technology, phone calls, or traditional methods of communication (details given in Chapter 2) It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community. Following parameters will be used to achieve a successful stakeholder's engagement program:

8.1 Engagement methods and tools in light of COVID-19 outbreak

With the outbreak and spread of COVID-19, people have been mandated by national or local law to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures have been adopted including some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

Given the COVID-19 pandemic situation, managing public consultation and stakeholder engagement in the Project needs to adhere to national requirements and any updated guidance issued by WHO and the World Bank. The alternative ways of managing consultations and stakeholder engagement will be in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

With growing concern about the risk of virus spread, there was an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Considering the importance of complying with national law requirements, below are some suggestions for stakeholder consultation amidst COVID-19 outbreak:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, and categories of stakeholders.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.
- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines.
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, specific channels of communication that will be used while conducting further stakeholder consultation and engagement activities need additional considerations. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings; If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;

- Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- 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;
- However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, PGCB should discuss whether the project activity can be rescheduled to a later time. Where it is not possible to postpone the activity or where the postponement is likely to be for more than a few weeks, IA should consult AIB Teams to obtain advice and guidance.

8.2 Advance Public Notification

Advance public notification of an upcoming consultation meeting will be given and it will be available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g., a copy of the newspaper announcement) for the accountability and reporting purposes. Existing notice boards in the communities may be particularly useful for distributing the announcements, such as boards adjacent to the widely visited public premises like local government office (ward commissioner office/union Parishad), village markets, post offices, transport links, and offices of the local NGOs. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by bypasses or covered by other advertisements. The project's staff will therefore maintain regular checks in order to ensure that the notifications provided on the public boards remain in place and legible. In case of international stakeholders, notice will be given through email, phone calls, through websites etc.

8.3 Communication with project affected people and vulnerable communities

Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected community representatives/ village leaders/ local NGOs and initiative groups to relay up-to-date information on the project and consultation meetings to other members of the community, particularly to those in remote areas of the vicinity of the project sites of PGCB for a larger part of the year. Moreover, due to the construction of SS and TLs, local communities, and local business might be affected as well. Advertising the project and the associated meetings could be made via announcements or television and making direct calls and through dedicated websites, social media and local FM Radio (mobile phone communication with internet facility is widely available in Bangladesh) could be adopted for reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby

enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons. The following, when adopted give dividend:

- Making available a register for comments and suggestions by any member of the affected community and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.
- Drafting and communicating an agenda for the consultation meeting provides a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion. This gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing to record comments and suggestions for subsequent incorporation into the project design. The recorded comments and how they have been addressed by the project become an appropriate material for inclusion in the project's regular reporting to the stakeholders.
- Knowledge and advice of the community representatives and local NGOs are invaluable to ensure that these aspects are fully observed. If deemed necessary, separate meetings and focus group discussions will be held, as described above.

An attendance list is made available at the commencement of the consultation/hearing in order to record all participants who are present at the meeting and their affiliation. Wherever possible, attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g., those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting or a hearing will be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies. Where technical specifics of the project's particular activities or solutions are required to be delivered in a greater detail, it will be ensured that the information conveyed remains comprehensible to all members of the audience and that the description of complex technicalities is adapted to their level of understanding, thereby enabling productive feedback and effective discussion.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentation and any demonstrations involved. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users and covid management procedures etc.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including: Taking of written minutes of the meeting by a specially assigned person or a secretary; Audio recording (e.g., by means of voice recorders); and Photographing.

Questions provided in the evaluation form on the consultation may cover the following aspects:

- ✓ Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- ✓ How did they learn about the Project and the consultation meeting?
- ✓ Are they generally in favor of the Project?
- ✓ What are their main concerns or expectations/hopes associated with the Project or the particular activity discussed at the meeting?
- ✓ Do they think the Project will bring some advantages to their community as a whole?
- ✓ Is there anything in the Project and its design solutions that they would like to change or improve?
- ✓ Do they think that the consultation meeting has been useful in understanding the specific activities of the Project, as well as associated impacts and mitigation measures? What aspects of the meeting they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that filling the form is optional. Some persons may be willing to express their feedback verbally and in this case a member of Project staff will be allocated to take notes.

Table 7: Methods, Tools and Techniques for Stakeholder Engagement

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Provision				
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on Project activities, facilities, technologies and design solutions, as well as impact mitigation measures. Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects. Information may be presented both in Bangla for local and national stakeholders, and in English for international audience.	Distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in remote areas. Placement at the offices of local administrations and NGOs, libraries and other public venues. Once the project will be approved by the Bank and line ministry, documents will be disclosed	Households in Project Area of Influence. Residents in the project area and adjacent communities
Distribution of printed public materials: newsletters/ updates	A newsletter or an updated circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, electronic subscription, delivery in person.	Households in Project Area of Influence. Public venues in Project Area of Influence – local administrations, communities.
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/impact management measures. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders. PGCB will make use of this tool during all public consultations, FGDs and other meetings where large group of	Affected communities in in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
			people will be gathered either to ventilate their concerns or to be informed of progress of work of new component/sub component.	forums attended by Project stakeholders.
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centers, post offices, shop, local administrations. These would be regularly updated as the simplest and most cost-effective means to educate all about the progress of the project, changes in the plan or what is in the offing. Notice Boards could also be used as a tool for circulation of jobs for the local population	Directly affected communities in the project area
Websites Use of Dedicated Website by PGCB including dedicated social media platform like Twitter, Facebook, WhatsApp, etc.	All the project activities, documentation, notices, project updates will be published in the project websites.	All contents mentioned above will be displayed in the project websites.	Through websites Websites would be updated on regular basis. All circulation that are communicated through other means must be included in the website.	For all types of stakeholders
Information Feedback				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to	Various Project-related materials, ESIA/SEP/RP/LMP and other safeguard documentation, environmental and social action plans.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience is also given free access to a register for comments and suggestions.	Directly affected communities in the project area and all interested stakeholders

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	leave their comments in a feedback register.		As and when new material is available, it should be kept in the repository	
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project and related solutions/impact management measures. Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups or community wide. Administering questionnaires as part of the household visits. To be conducted on need basis	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence.
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders. Should always be available at the project site throughout the lifecycle of the project. Feedbacks/Suggestions must be addressed regularly and actions to be circulated using appropriate means.	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence.
Consultation & Participation				
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders.	Directly affected communities in the Project Area of Influence. Other communities within the Project Area of Influence.

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
			Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period. Public hearing must be arranged as and when required. Leaving aside the construction related work, rest of the project work is primarily academic and may not be useful for public hearing but useful for the relevant stakeholders. Public hearing must the relevant and address specific components and subcomponents	Residents of in the Project Area of Influence
Focus Group discussion (FGD)	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders. Invitation for FGD to be uploaded in the relevant website	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders. To be arranged as and when relevant Dissemination of the outcome of the FGD to be uploaded in the relevant website and its reflection would also be made conspicuous in the curricula, and other linked platforms.	Directly affected households in the Project Area of Influence, youth, elderly, women, and other vulnerable groups.
Information centers and field offices	Project's designated venue for depositing Project-related information that also offers open hours to the community and other members of the public, with Project staff	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info center or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to	Directly affected communities in the Project Area of Influence and any other stakeholders and interested parties.

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	available to respond to queries or provide clarifications.		stakeholders, as well as during public meetings and household visits.	
Site Tours	<p>Visits to Project Site and facilities organized for local communities, authorities and the media to demonstrate Project solutions.</p> <p>Visitors are accompanied by the Project’s staff and specialists to cover various aspects and to address questions arising from the public during the tour.</p>	Demonstration of specific examples of Project’s design solutions and approaches to managing impacts.	<p>Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site.</p> <p>Limitation: possible safety restrictions on the site access during active construction works.</p> <p>To be conducted periodically to monitor the progress of the project or certain specific component/ subcomponent</p>	<p>Local communities within the Project Area of Influence.</p> <p>Elected officials.</p> <p>Media groups.</p> <p>NGOs and other initiative groups.</p>

8.4 Planned stakeholder engagement activities

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. Table 8 presents the stakeholder engagement activities PIU and PMU will undertake for their project(s). 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.

Table 8: Stakeholder Engagement Activities

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation (Project design, Scoping, Resettlement Planning, ESIA, LMP, GVP Plan and SEP preparation and Disclosure)	Project Affected People: People potentially affected by land acquisition, when triggered People residing in project area Vulnerable households	ESIA, LMP, Gender and GBV prevention plan, SEP, RP disclosures; Land acquisition process; Assistance in gathering official documents for authorized land use; Compensation rates and methodology; Compensation packages; 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 Grievance mechanism Local news paper The following modes to be adopted specifically for the vulnerable groups:	During preparation and detailed design stage-that would affect the area. Continuous communication through mass/social media and routine interactions throughout RP development as needed.	PGCB staff responsible for land acquisition or its consultant

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			<ul style="list-style-type: none"> • Robust engagement with local community-based organizations. • The project would arrange separate consultation sessions for different target groups • Resources allocation towards local administration representatives and councilors. • Provision of transportation or transportation cost particularly for the disabled, marginalized and the elderly ones including women • Engagement of local NGO's and CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations • Separate consultation with men and women to be arranged • Manageable and gendered FGD to be arranged so that 		
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Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			<p>women can speak freely</p> <ul style="list-style-type: none"> The project must have adequate means to reach the disabled ones in the community. If need be, teams must visit the disabled ones in their habitat Information may be printed in Braille to allow the blind ones to have access to the project details 		
	<p>Other Interested Parties (Internal)</p> <p>Press and media</p> <p>NGOs</p> <p>Businesses and business organizations</p> <p>Workers' organizations</p> <p>Academic institutions</p> <p>National Government Ministries</p> <p>Different Government Departments</p> <p>General public, Rohingya communities, jobseekers</p>	<p>ESIA, RP, LMP, SEP disclosures</p> <p>Grievance mechanism</p> <p>Project scope, rationale and E&S principles</p>	<p>Public meetings,</p> <p>Mass/social media communication</p> <p>Disclosure of written information: Brochures, posters, flyers, website</p> <p>Information boards</p> <p>Grievance mechanism</p> <p>Notice board for employment recruitment</p>	<p>Throughout RP/ESIA/LMP/SEP and GBV prevention plan development as needed;</p> <p>Project launch meetings at local PGCB office and PGCB head quarter;</p> <p>Quarterly meetings in affected villages and affected communities</p> <p>Disclosure meetings in local, national level</p>	<p>PGCB responsible for land acquisition or its consultant</p>

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Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) Other Government Departments from which permissions/clearances are required; Other project developers, donors	Legal compliance issues Project information scope and rationale and E&S principles Coordination activities Land acquisition process Grievance mechanism process Disclosures of E&S documents	Face-to-face meetings Invitations to public/community meetings Submission of required reports	Disclosure meetings Reports as required	PGCB and PIU
STAGE 2: Construction and mobilization activities	Project Affected People People potentially affected by land acquisition People residing in project area Vulnerable households	Grievance mechanism Health and safety impacts (ESMP, 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 in PGCB Notice board(s) at construction sites, Grievance mechanism and as guided with ESF documents mainly RP and ESIA.	Quarterly meetings during construction seasons Communication through mass/social media as needed Notice boards updated weekly Routine interactions Brochures in local offices	PGCB, PIU, ESU, or its consultants contractors, RP implementing NGO

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Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Rohingya Camp authority and communities	Project activities, duration, OHS measures, fire safety measures, etc.	Face to face meetings, meeting at site management, RRRC and IOL office	As and when required. 1 st meeting before the construction starts	PGCB, PIU, ESU or its consultant, contractors,
	Vulnerable communities and project affected people	Vulnerable group has to be identified considering the households which are (i) living below the official poverty line; (ii) women headed households living below the official poverty line; and (iii) headed by elderly persons or disabled persons. Announcement of vacancies (skilled/unskilled) at proposed site; Announcement of contract work for small scale work associated with the proposed Project;	Face to face, consultation, FGD etc.	Before the construction starts and during the construction period	PGCB, PIU, ESU or its consultants, contractors, RP implementing NGO
	Other Interested Parties (External) Governmental committees for land use and compensation representatives in villages	Project scope, rationale and E&S principles Grievance mechanism Project status Bank compensation requirements	Face-to-face meetings Joint public/community meetings with PAPs	As needed (monthly during construction season)	PGCB, PIU, ESU or its consultant, contractors

Stakeholder Engagement Plan

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 Various 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	Public meetings, open houses, trainings/workshops Disclosure of written information: brochures, posters, flyers, website, Information boards Notice board(s) at construction sites Grievance mechanism	Same as for PAPs	Same as above
	Other Interested Parties (External) Press and media NGOs Businesses and business organizations Workers' organizations Academic institutions Local Government Departments General public, tourists	Grievance mechanism process Issues of concern Status and compliance reports	Grievance mechanism PGCB website Face-to-face meetings Submission of reports as required	As and when required	PGCB Staff, PIU, ESU or its consultant

9. Grievance Redress Mechanisms

The Project Proponent would establish a procedure to deal with and resolve any queries as well as address complaints and grievances about any irregularities. In this regard, a policy and/or guideline will be prepared and adopted for assessing and mitigating potential social and environmental impacts through grievance redress mechanism (GRM). The GRM will deal with complaints and grievances related to both social/resettlement and environmental issues of the Project. Grievance Redress Committees (GRC) will be formed to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the Project-affected persons. Based on consensus, the procedure will help resolving issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The GRCs will be established through a gazette notification from the Ministry of Power, Energy and Mineral Resources (MoPEMR); therefore, the GRC will be a legally constituted body.

The Grievance Redress Committee (GRC) will be established locally at Project sites and centrally at the Project level to receive and settle grievances from the affected persons and other local stakeholders. Most of the grievances will be resolved at the local-level GRC (LGRC), but those cases that cannot be resolved at the local level will be forwarded to central level. The local level GRC will be constituted with the following persons:

1. Executive Engineer, PGCB: Convener
2. Representative of INGO (Non-voting): Member-Secretary
3. Chairman of Union Perished (UP) concerned: Member
4. Female member of ward of the UP concerned: Member
5. Retired teacher from the union concerned: Member
6. Representative of PAPs: Member

The RP implementing NGO will keep a close liaison with the affected people and discuss any type of issues, observation, complaints at focus group discussion (FGD) meetings on a weekly or fortnightly basis. Most of the issues will hopefully be settled in the focus group meeting but some issues requiring formal hearing and resolution will be brought to the Grievance Redress Committee (GRC) for resolution in form of a formal complaint. All complaints will have to be received at the local (Union) level GRC (LGRC) and resolved within a certain period (maximum four weeks from the date of lodging the complaints) as per circular of the MoPEMR (gazette notification). If the resolution attempt at the local level fails, the LGRC will refer the complaint with the minutes of the hearings to the PGRC.

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. PGCB will maintain the following three Grievance Registers:

Intake Register: (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

Resolution Register: (1) Serial no., (2) Case no., (3) Name of complainant, (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.

Closing Register: (1) Serial no., (2) Case no., (3) Name of complainant, (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.

Grievance resolution will be a continuous process in project level activities and implementation of those. The PIC will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PIU also prepares periodic reports on the grievance resolution process and publish these on the PGCB website.

The PGCB intends to strengthen the GRM through information and communication technology to ensure that all complaints including those of sexual exploitation and abuse are immediately reported to the PGCB. The complaints registered in this system will be managed by a dedicated administrator that will liaise immediately any GBV and SEA complaints with the contractors, consultant and PGCB/PIU/ESU for immediate measures. If the GRM receives a case on sexual exploitation and abuse related to the project, it will be recorded with due consideration to the confidentiality and privacy of the complainant, and with the consent of the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. The first cut of mapping of GBV service providers focused exclusively on services that respond to gender-based violence in Bangladesh. The mapping includes nation-wide a total of 135 service providers, within which around 50 SPs are based in the Chattogram division. The ESU/PGCB or its consultant will keep the information confidential to protect privacy of GBV and SEA complainants. In cases, where the perpetrator(s) is linked to project activities then the contractor will take appropriate actions as per the Code of Conduct signed by the particular person and under the effective law in Bangladesh. PGCB will report activities and outcomes of GBV and SEA surveillance and management to the AIIB on a regular basis. For further details, please GBV prevention plan.

To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the Convener will apply the following guidelines:

- i. A standard application format will be used for receiving grievances which will be available at the office of NGO /Consulting firm. This application format would be concurred by the PD.
- ii. Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons.
- iii. Remove a recommendation by any person that may separately accompany the grievance redress application.
- iv. Disqualify a GRC member who has made a recommendation on the application separately before the formal hearing.
- v. Where a GRC member is removed, appoint another person in consultation with the Project Director.
- vi. The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in this RAP and the mitigation standards, such as compensation rates established through market price surveys.

The following steps will be followed for the successful implementation of GRM.

- **Step 1:** Project stakeholders will be able to provide feedback and report/record complaints through several channels: in person at offices and at project sites, and by mail, telephone, and email.
- **Step 2:** Complaints and feedback will be compiled by the secretary in each level and recorded in a register. He or she will place the grievances to the committee and the complained person with the goal to resolve complaints within 15 days of receipt.
- **Step 3:** 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.

- **Step 4:** 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. 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:** 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. Data on grievances and/or original grievance logs will be made available to AIIB missions on request, and summaries of grievances and resolutions will be included in periodic reports to the AIIB.

10. Monitoring and Reporting

Monitoring of Project activities is necessary to cater to the stakeholder's concerns by ensuring transparency in guaranteeing the PGCB's commitment in implementing the mitigation measures that addresses the environmental and social impacts arising from the Project.

Through this information flow, the local stakeholders feel the sense of responsibility for the environment and welfare in relation to the Project and feel empowered to act on issues that might affect their lives.

PGCB should undertake a commitment in undertaking internal audits every quarter. All related information shall be readily maintained at the site office and produced at the time of the audits. Audit reports shall be accordingly created after every quarterly audit and submitted to the Social Officer. All records of these reports shall be maintained at the site office as well as the Corporate Office. In addition, an external auditor shall be engaged every six monthly to assess the activities of the Project and its mitigation measures. The auditor shall accordingly submit a report to the company for review and this should be forwarded to the lender financing the Project as well.

The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. PGCB or its consultant will work on a reporting matrix in this regard.

Table 09: Monitoring report Matrix

Key elements	Timeframe	Methods	Responsibilities
Stakeholders' access to project information and consultations	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey	PIU and ESU together with Social and Environmental monitor
Project beneficiaries' awareness of project activities, their entitlements and responsibilities	Periodic (during project implementation)	Interviews, observations, survey	PIU/ESU and/or its consultant

Key elements	Timeframe	Methods	Responsibilities
Acceptability and appropriateness of consultation and engagement approaches	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	Same as above
Community facilitators' engagement with target beneficiaries	Periodic (during project implementation)	Interviews, observations, survey, score-card as relevant	Same as Above
Accessibility and readability of public information dissemination materials	Periodic (during project implementation)	Spot checks, interviews, desk-review	ES Monitor
Tones in social media and broader public perceptions (including NGOs/CSOs)	Periodic (during project implementation)	Social media monitoring, interviews, observations	PGCB/PIU
Rate of grievances and complaints (reported and unreported)	Periodic (during project implementation)	Desk review, interviews, survey	PGCB and/or its consultant

10.1 Closing the Feedback Loop: Reporting back to stakeholder groups

The project team will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs should be always carried through face-to-face meeting or direct interactions, for the other stakeholders' group, although this may be adjusted considering the COVID-19 situation. Other pertinent media, such as website, social media, press briefing, may also be used.

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 those in a timely and effective manner.

The Project through the social monitor 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.

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

1. Publication of a standalone annual report on project's interaction with the stakeholders.
2. 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;
- ✓ 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.

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 PGCB websites, social media accounts, communication materials, etc.

10.2 Points of contact

Information on the project and future stakeholder engagement programs will be available on the project’s website and will be posted on information boards in the project site, local government offices, local markets and point of assembly etc. Information can also be obtained from PGCB offices and from their websites. There should be a dedicated point of contact for recording project related complaints (including GBV related complaints) and passing those to the GRC for necessary action at their end. GRM should be user friendly and easily approachable, particularly by the disabled, marginalized and the vulnerable groups including the elderly.

The point of contact regarding the stakeholder engagement program at PGCB should provide the following information:

Description	Contact details
Name and position	
Address:	
E-mail:	
Telephone:	
Toll Free Number:	
- For PGCB	

10.3 Roles and Responsibilities

The specific role/responsibilities as regard the project's stakeholders' management is provided below:

Table 10: Role and Responsibilities for SEP Implementation

Actor/Stakeholder/ responsible person	Responsibilities
ESU/PIU-PGCB and/or its consultant	<ul style="list-style-type: none"> - Overall planning and implementation of the SEP; - Lead activities on stakeholders' engagement - Management and resolution of grievances; - Guide/coordinate/supervise the contractors for activities related to the SEP - Monitoring and reporting on SEP to PGCB and AIIB - Take lead in carrying out the beneficiary satisfaction survey - Supervision/monitoring of Contractor on SEP and GRM
Site Contractor(s) / sub-contractors	<ul style="list-style-type: none"> - Report/inform PGCB on issues related to the implementation of the SEP / engagement with the stakeholders. - Resolve and convey management/resolution of grievance cases to the project GRM team, in particular labor related grievance cases. - Prepare, disclose and implement the contractor's code of conduct, CESMP, etc. - Collaborate/inform the local communities and other local level stakeholders on the E&S monitoring - Provide SEP and other E&S documents implementation with monthly/quarterly/half yearly progress report.