

# STAKEHOLDER ENGAGEMENT PLAN

## 1. Introduction

This document is the Stakeholder Engagement Plan (SEP) for the Mongolia Transport Connectivity and Logistics Improvement Project (hereafter "the project") drafted in July 2021 and updated accordingly. The SEP will be available on the Ministry of Road and Transport Development website.

The World Bank (hereafter "the Bank") is proposing to provide \$110million, an International Bank for Reconstruction and Development credit to the Mongolian Ministry of Finance for the Project. The executing agency is the Ministry of Road and Transport Development. The Road Development Agency, the Ministry of Food, Agriculture, and Light Industry, the National Development Agency, and the Ministry of Finance will be coordinated for cross sectoral activities under the leadership of the Cabinet Secretariat of Mongolia.

The SEP has been prepared based on consultation with the project stakeholders<sup>1</sup> and desk research on stakeholders. The SEP identifies project stakeholders, the methods for information distribution and consultations during the life of the Project and the approach to grievance redress.

The key objectives of the stakeholder engagement according to the World Bank's ESF, World Bank Environmental and Social Standard (ESS) 10<sup>2</sup> are:

- To establish a systematic approach to stakeholder engagement that will help identify stakeholders and build and maintain a constructive relationship with them, in particular Project affected parties.
- To assess the level of stakeholder interest and support for the Project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow project implementer to respond to and manage such grievances.

The World Bank proposes to provide financing for the project and as such environmental and social assessments and other planning documentation is needed for the project to meet the requirements of the World Bank's Environmental and Social Framework (ESF) effective since October 1, 2018. The various assessments for the project include:

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<sup>1</sup> A "Stakeholder" refers to individuals or groups who: (a) are affected or likely to be affected by the Project (project-affected parties); and (b) may have an interest in the Project (other interested parties).

<sup>2</sup> Environmental and Social Framework for IPF Operations. *ESS10: Stakeholder Engagement and Information Disclosure*, 2018.

- o Environmental and Social Management Frameworks. (ESMF, all project components) The ESMF guides environmental and social assessment requirements and development of management and mitigation measures once the alignment has been further confirmed.
- o Stakeholder Engagement Plan (SEP, all project components). This document, which has been prepared for the whole project, including components prepared prior to appraisal and those developed after appraisal; given the majority of the stakeholders are similar and to provide a whole of project approach to consultation activities.
- o Environmental Social Management Plan (ESMP, sub-components 1.1 and 1.2) for the repair and rehabilitation of key road sections and the new construction of 127km priority local roads, this plan outlines the mitigation and management measures for this component.
- o Labor Management Procure (LMP, all project components) this document including a labor grievance redress mechanism, outlines labor requirements for the project.
- o Resettlement Policy Framework (RPF, sub-components 1.1 and 1.2). The RPF guides the assessment and compensation requirements for the project, it is contained as an Annex to the above mentioned ESMF.
- o Resettlement Plan (RP, sub-components 1.1 and 1.2). In case land acquisition or restrictions to access to income resources in unavoidable RAPs will be prepared. The RAPs would outline the process and compensation that will be followed by the project.

The World Bank's ESF, 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". 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 (GRM). The national regulatory requirements as well as those under the ESF are incorporated herein.

In addition to the World Bank Environmental and Social Standard (ESS) 10, there are national requirements for stakeholder engagement regulations. Mongolian regulatory requirements for consultation and disclosure are also considered herein. The Law on Urban Development (2015, Article 17 and 18) states participatory planning shall be adopted in urban development planning and consultation with citizens shall be conducted in the course of implementation of urban planning. Decisions pertinent to urban development shall be disseminated and disclosed to the public in timely manner. Utility disruptions are required to be disclosed to residents and entities 24 hours prior to disruptions. The Law on Environmental Impact Assessment (2012, Article 5 and 18) requires that:

- DEIA process of development plans and programs shall be disclosed to the public through Environmental Authority's website.

- There will be a 30-working day period for submittal of verbal or written public input. The DEIA consultant should organize community consultations that include local government and residents within the area of influence.
- The DEIA should include meeting minutes, comments by local government, and community consultation for local communities in the area of influence.

## 2. Project Description

The Project Development Objective (PDO) is to improve transport connectivity and logistics efficiency for strategic value chains in Mongolia and strengthen the institutional capacity at the MoRTD to deliver, maintain and manage road infrastructure assets. The project has four components as described below.

<i>Component</i>	<i>Activities</i>
<b>Component 1.</b> <i>Infrastructure investments</i>	<ul style="list-style-type: none"> <li>• Results-based maintenance of priority road sections in 2,700km strategic roads connecting 8 aimags (244km).</li> <li>• Last-mile connectivity for local herder community to the national road network (~127km).</li> <li>• Road asset management framework and system.</li> </ul>
<b>Component 2.</b> <i>Transport and logistics services</i>	<ul style="list-style-type: none"> <li>• A model logistics hub</li> <li>• Logistics and supply chain platform.</li> <li>• Pilot projects for innovations in the supply chain:               <ul style="list-style-type: none"> <li>○ Real-time monitoring of deliveries (including RFID, QR-code, Track &amp; Trace blockchain).</li> <li>○ Smart Good Manufacturing Practice (GMP), warehouse and automation (robotics for contamination prevention).</li> <li>○ Smart trucks and containers, handling technology.</li> </ul> </li> <li>• Regulations and standards for contract logistics services.</li> <li>• Logistics for cold-chain storage.</li> </ul>
<b>Component 3.</b> <i>Technical Assistance and capacity building</i>	<ul style="list-style-type: none"> <li>• Preparatory works for logistics hubs.</li> <li>• Strategic studies and master plans.</li> <li>• Capacity building and training.</li> </ul>
<b>Component 4.</b> <i>Contingent Emergency Response Component (CERC)</i>	This zero-dollar component is designed to provide swift response in the event of an eligible crisis or emergency, by enabling the client to request the World Bank to reallocate project funds to support emergency response and reconstruction where needed.

Detailed description of the Project can be found in Chapter One of this ESMF.

## 3. Brief summary of Previous Stakeholder Engagement Activities

List of screening and meetings undertaken during project preparation before the appraisal by WBG as of June 30, 2021 and summarized on the next table.

<b>Stakeholder</b>	<b>Topics</b>	<b>When</b>	<b>Summary of suggestions</b>
<b>Executing/ Implementation</b>	Overall project concept, ESF and	<b>March-June 2021</b>	Regular updates were provided to relevant MoRTD officials. Exchanged

Stakeholder	Topics	When	Summary of suggestions
<b>Agency-Ministry of Road and Transport and its relevant road development authorities</b>	its relevant instruments requirements. ESMF& ESMP draft development and engagements		relevant studies and resources for selected or potential road locations and beneficiary areas.
<b>National and local NGOs</b> (pasture management group and road monitoring local NGO representatives, herder cooperatives of potential beneficiary soums, local environment conservation worker and researchers, women led business association, women led private sector representatives) and <b>development partners</b>	Overall project concept, Environment and social risks and impacts	<b>Friday, June 18, 2021</b> Online meeting with 8 participants	<b>Overall project results, road design and environmental impact:</b> <ul style="list-style-type: none"> <li>• In overall, participants expect that planned intervention would bring positive development outcomes to expected outcomes. Keen to learn the selection criteria of road repair and last mile connectivity roads as well as its links to logistics aspects.</li> <li>• Different design has to be considered for Gobi, steppe and land with permafrost. Because previous local cases of road works did not assess or take account of potential climate and environmental risks.</li> <li>• Local CSO road monitoring is essential during design, construction and maintenance, as CSOs are interested to carry out third party monitoring such as Khuvsgul case in 2013 supported by World Bank grant.</li> <li>• Ecological crossing needs to be built at as a speed limit is commonly broken in paved roads and animals and livestock increasingly gets killed more often.</li> </ul> <b>Women led business and capacity issues:</b> <ul style="list-style-type: none"> <li>• Women business usually lack information, confidence and network, which leaves them excluded from procurement process. They see their opportunity is slim and it is male dominated sector.</li> </ul>

Stakeholder	Topics	When	Summary of suggestions
			<ul style="list-style-type: none"> <li>• Women business leaders are lack knowledge and information on how to meet meat industry standard and access the EU, Arabian market.</li> <li>• Capacity building/training programs are needed for woman’s participation, and targeted inclusion for the project activities.</li> <li>•</li> <li>• General concern on GBV is high and workplace GBV is high.</li> <li>• SMEs and informal businesses were negatively affected by the COVID 19 impact.</li> <li>• Increase the collaboration among women led businesses.</li> </ul>
<p><b>National Agencies, and Local Government of beneficiary 8 aimags</b> (including Aimag Governor’s office officials in charge of environment, strictly protected areas, land management, cultural heritage and development planning) and <b>State-owned road maintenance companies</b></p>	<p>Overall project concept and Environment and social risks and impacts</p>	<p><b>Monday, June 21, 2021</b></p> <p>Online meeting with approximately 30 participants</p>	<p><b>Road design and prioritization:</b></p> <ul style="list-style-type: none"> <li>• Those new road design should take account of mining and other heavy-duty activities to avoid any damage.</li> <li>• During construction, temporary roads need to be built. There will be increased dust and adequate watering of road is essential.</li> <li>• Appreciated the informative meeting such as the organized meeting and expressed their interest to organize and attend such transparent and inclusive meetings as well provide local data and statistics if needed.</li> <li>• There are local priorities to be considered for soum selection on new roads to support local tourism and other activities. For instance, Arkhangai aimag, following the historical horseback travel, aimag Citizens Representative Khurals approved it as part of local development plan and prioritized Chuluut soum for</li> </ul>

Stakeholder	Topics	When	Summary of suggestions
			<p>tourism. Erdenemandal soum has potential for pilot meat manufacturing. For Uvs aimag, soum roads other than Sagil and Turgen should be considered.</p> <ul style="list-style-type: none"> <li>Local bridges and drainages need to be repaired. If possible, major repair and a new placement of flood and water drainage are required.</li> <li>Current road repair and maintenance must be prioritized as local soum road user rate is low.</li> </ul> <p><b>Environmental impact:</b></p> <ul style="list-style-type: none"> <li>Consider checking ecological police data, some statistics on animal accidents can be seen. Ecological and animal friendly roads need to be built at certain locations to meet international standard and local legislation.</li> <li>Wood theft may increase in certain locations such as Bulgan soum, Arkhangai aimag</li> <li>For extraction of common road materials, herders would be reluctant to provide their pastureland and some dispute may rise.</li> </ul> <p><b>Stakeholder engagement:</b></p> <ul style="list-style-type: none"> <li>Aimag authorities, including Road maintenance companies, and NDA are interested to be engaged on prioritization and design and new road planning.</li> <li>Recommended to visit the field for route selection and project design inputs once COVID 19 restrictions eases.</li> </ul>

**4. Stakeholder Identification and Analysis**

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. The stakeholder engagement aims to support developing strong, constructive, and responsive relationships that are important for successfully managing a project's environmental and social risks. Stakeholder

engagement is most effective when initiated at an early stage of the project development process. It is an integral part of early project decisions and the assessment, management, and monitoring of the Project's environmental and social risks and impacts.

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

**Table 1. Stakeholder identification**

Stakeholder	Role in the project	Interest	Influence
Ministry of Road and Transport Development of Mongolia	Executing and implementation agency: Technical design, permits, project steering committee member	High	High
Ministry of Environment and Tourism /Municipal Environmental Department	The MoET will provide environmental clearances and may undertake inspections and monitoring at their discretion.	Medium	Medium
Ministry of Finance	Follow up on the fulfilment of the Minister's Regulation 196 on utilization of proceeds of external debts incurred by the Government of Mongolia; implementation, administration, financing, monitoring and evaluation of projects and programs funded by such proceeds.	Medium	High
Ministry of Food, Agriculture and Light Industry	Coordination in project design and implementation	High	High
National Development Agency	Coordination in project design and implementation	High	Medium

Stakeholder	Role in the project	Interest	Influence
8 Aimag authorities, Aimag Major's Office and its agencies	Participate in the project implementation	High	Low
Road Development Center	Participate in the project implementation	High	Low
Transport Police	Participate in the project implementation	Medium	Low
Aimag and Soum Land management authority	Land management agency and division of related districts will provide clearances for land ownership documents, land certificate, land use agreement and cadastral maps.	Medium	Medium
Municipal and Aimag Agency for Specialized Inspection	Periodic inspection of construction work	Medium	High
Project Steering Committee	Chaired by the Cabinet Secretariat of Mongolia and consist of representatives from MoRTD, MoFALI, MoF, NDA, local government and relevant agencies. Provide overall guidance to the Project implementation as per Regulation 196 on utilization of proceeds of external debts incurred by the Government of Mongolia	High	High
Project Management Office	Lead project implementation	High	High
Contractor /Concessionaire	Project partners	High	High
	Participate in the project implementation		
Consultants/Advisors	Project partners	Medium	Medium
	Participate in the project implementation		
Local research institutes	Potential project partners	Medium	Low
	Participate in the project implementation		
NGOs and Interests groups	Potential project partners	High	Medium
	Participate in the project implementation		
Project-Affected public entities	Participate in the project implementation	High/Affected	Low
Project-Affected private entities	Participate in the project implementation	High/Affected	Low
Project-Affected residents	Participate in the project implementation	High/Affected	Low



Stakeholder	Role in the project	Interest	Influence
Project-Affected vulnerable group (possibly ethnic minority groups)	Participate in the project implementation	High/Affected	Low
Users (passerby)	Participate in the project implementation	Low/Affected	Low

## 5. Methodology

To meet best practice approaches, the Project will apply the following principles for stakeholder engagement:

*Openness and life-cycle approach:* public consultations for the Project (s) will be arranged during the whole life cycle, carried out openly, free of external manipulation, interference, coercion, or intimidation.

*Informed participation and feedback:* information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.

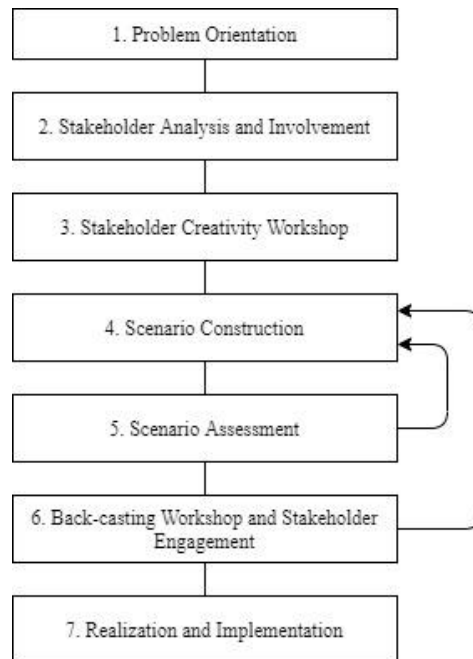
*Inclusiveness and sensitivity:* The participation process for the projects shall be inclusive. First, PMO shall coordinate equal access to information for all stakeholders. Sensitivity to stakeholders' needs is the fundamental principle underlying the selection of engagement methods. PMO shall also highlight the inclusion of vulnerable groups, particularly the elderly, diverse ethnic groups, and persons with disabilities.

*Flexibility:* if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement with the stakeholders, including individual telephone calls, and various possible forms of internet communication.

*Various stakeholder engagement tools are available.* One of the methods is the stakeholder-oriented backcasting approach, focusing on identifying future sustainable alternatives for fulfilling stakeholder's needs. (Quist, 2006) The backcasting method<sup>3</sup> allows integrated approaches for involving a broad range of stakeholders and actors of different groups such as government, companies, public interest groups, and knowledge bodies, defining the problem and searching for solutions and conditions, and developing shared visions.

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<sup>3</sup> Holmberg J (1998) Backcasting: a natural step in operationalizing sustainable development. *GreenerManag Int* 23:30–51



**Figure 1. Stakeholder Engagement Example using Back casting Approach**

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

*Affected Parties* – persons, groups and other entities within the project area of influence that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the Project and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

*Other Interested Parties* – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the Project and the process of its implementation in some way; and

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

Affected Parties include local communities, community members, and other parties that may directly impact the Project. Specifically, the following individuals and groups fall within this category:

- All road users
- Citizens of all ages living nearby
- Business owners
- Vulnerable groups

Other interested parties: the projects' stakeholders also include parties other than the directly affected communities, including:

- Other vendors or service providers and suppliers
- Knowledge bodies, i.e., research institutes, international and national consultants
- Other national and international organizations
- National and local media companies
- Public at large
- All decision-making bodies

Disadvantaged/vulnerable individuals or groups. It is essential to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals, or natural resources. Engagement with vulnerable groups and individuals often requires specific measures and assistance to facilitate their participation in project-related decision-making.

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

- Children
- Youth
- Women
- Elderly
- Poor
- Low income and single headed households
- Temporary residents (rural migrants) without residency and land ownership registration
- Ethnic minority households
- Persons with disabilities (PWD)
- Small businesses that require direct access

### **Engagement with Persons with Disabilities**

Accessible means of communication is different for each group. Following are examples:

- People who are deaf may require sign language interpretation to understand what is going on at the meeting.
- People who use hearing aids may require a loop system. A loop system facilitates hearing at large meetings.
- People with learning disabilities may require easy-to-read (which are simplified) versions of documents to enable their comprehension of technical details.
- People with mental health difficulties may benefit from pre-meeting contact to overcome their fears of being stigmatized within the gathering. Dealing with concerns about stigmatization will assist the inclusion of all marginalized groups in society.
- People with mobility disabilities using a wheelchair will require a ramp or level access to a building, a lift instead of staircases, sufficient room to move inside the building, and accessible toilet facilities.

## 6. Stakeholder Engagement Activities

State Emergency Commission (SEC) of Mongolia decided to declare public readiness for disaster protection several times until COVID-19 mitigation measures are effectively enforced. (SEC, 2021)

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

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

When project activities are finalized, screening and identification of projectaffected persons will be undertaken. The focus will be to identify communities affected by the last mile connectivity and the logistics hub. Public consultation with the affected persons will take place in a variety of methods which are most meaningful to receive feedback from these APs

### Strategy for information disclosure

Stakeholders	Interest	Communication Method	Accountability
All stakeholders	Project information disclosure	Regular one-to-one meetings with all stakeholder groups, focusing on vulnerable groups; Announcements, letters, websites	MoRTD, PMO

Stakeholders	Interest	Communication Method	Accountability
All stakeholders	Sub-project design requirements	Regular one-to-one meetings with all stakeholder groups, focusing on vulnerable groups; Announcements, letters, websites	MUB, PMO
Ministry of Finance	Project approvals	Official letters, meetings	MoRTD, PMO
Utility and urban planning authorities	Utility disruption plans, permits, approval	Official letters, meetings	MoRTD, PMO
Aimag and Soum Governor's Office	Support and collaboration, stakeholder engagement	Official letters, meetings	MoRTD, PMO
Ministry of Environment and Tourism	Permitting, assessment, approval	Official letters, Publicly available DEIA and EMP	MoRTD, PMO
General Agency for Specialized Inspection	Permits, inspections, approvals	Meetings	MoRTD, PMO
Business owners/residents in right of way (ROW)	Relocation support	Regular one-to-one meetings	MoRTD, PMO
Local communities	Traffic disruption, pedestrian access	Public meeting, Construction Notice Board, letters to residents, social media platforms, website, TV, radio, newspaper, UB municipal office website ( <a href="http://www.ulaanabaatar.mn">www.ulaanabaatar.mn</a> )	MoRTD, PMO
Institute of Archaeology of Mongolian Academy of Science (MAS)	Construction related chance finds of archaeology items	meeting, official letters	PMO, IE
National NGOs	Design inputs, problem identification, knowledge source, Trainings	Regular one-to-one meetings with all stakeholder groups, focusing on vulnerable groups; Announcements, letters, websites	PMO, IE
National Media	Project update	Media releases	MoRTD, PMO, IE

Stakeholders	Interest	Communication Method	Accountability
Donor and multilateral agencies	Project locations	Project Announcements, websites, media releases, meetings	MoRTD, PMO

**7. Monitoring and Reporting**

The PMO safeguard staff (an environmental specialist and a social specialist) will continue to conduct stakeholder engagement in accordance with this SEP and will build upon the channels of communication and engagement already established with stakeholders. In particular, the PMO will seek feedback from stakeholders on the environmental and social performance of the Project, and the implementation of the mitigation measures in the Environmental and Social Commitment Plan.

Consultation and disclosure activities will also be summarized and reported in semi-annual project reports to the World Bank. A number of Key Performance Indicators (KPIs) will also be monitored by the PMO on a regular basis, including the following parameters:

- Number of consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually).
- Frequency of public engagement activities.
- 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; and
- Number of press materials published/broadcasted in the national media.

**8. Resources & Responsibilities for Stakeholder Engagement Activities**

The Project Management Office (PMO) will be established by the Ministry of Road and Transport Development. The MoRTD will provide overall oversight for project activities including project preparation, supervision, and M&E. The PMO will have funds for implementing stakeholder engagement activities, which have been allocated under the Project.

The PMO will include safeguards specialists who will be responsible for implementing the activities of this stakeholder engagement plan. At this stage of project preparation questions can be directed to the MoRTD.

The MoRTD and PMO 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 stakeholder grievances as per the project GRM. Project workers will also receive necessary instructions for the labor GRM under the Labor Management Procedure.

**9. Grievance Mechanism**

Grievance Redress Mechanism (GRM) provides an effective approach for resolution of environment related complaints and issues of the affected person/community. PMO formulates the procedures for implementing the GRM and PMO's engineering staff shall undertake GRM's initiatives that include procedures of reviewing and recording complaints and comments, handling of on-the-spot resolution of minor problems, taking care of complaints and provisions of responses to stakeholders at all stages of the Project.

The GRM will be introduced during community consultations and made publicly available in Mongolian language to stakeholders throughout the Project. In the event of a grievance issue, up to four stages will be implemented, as follows.

Stage 1: Resolution at Local Level and Access to GRM. The GRM system enables affected person (local residents, representatives of local business entities, workers of contractors etc) to issue a complaint and/or comments choosing the most comfortable way out of several options such as hotline, in-person, written within the existing government procedure. The affected person's complaint will directly be recorded in the internal central web server of MoRTD which is linked to all feedback systems. The complaint record includes details such as the comments/grievance issue, the affected person's name, contact and date of grievance.

Stage 2: Complaint Eligibility Assessment and Resolution by MoRTD. Received complaint is assigned to the relevant personnel either in PMO or to the relevant department/division/unit in MoRTD. The PMO should take steps to investigate and resolve the issue. This may involve instructing the contractor to take corrective actions. The contractor should implement the redress solution and convey the outcome to the PMO and notify WB. Depending on the type and complexity of the grievance issue, PMO/MoRTD can solve the issue between 1-30 days after receiving the comment/complaint.

Stage 3: Complaint Resolution by PMO Steering Committee. PMO investigates and organizes multi-stakeholder meeting within 10 days of Stage 3 and then has 10 days to implement solution. A multi-stakeholder group may consist of equal number of government and non-government representatives from local government, implementing agencies, local social services, local community based or civil society organizations, ger area residents, women and disabled communities, private sector and media and should have no conflict of interests with relevant complaint parties.

Stage 4: Higher Authority Resolution. If complaint not addressed, AP may seek legal redress through court system.

The project GRM can be effectively managed based on government's existing system. The PMO GRM regulation can be developed with improvements to facilitate Implementation Agencies' involvement for better engagement with each and individual project-affected or/and other interested parties at all stages of the Project.

Currently utilized engagement channels:

#### 1. Government's 1111 Center and Hotline

Citizens either visit the center which is located in front of Government House or call the hotline.

The Office of the President, Parliament Office, Cabinet Secretariat and Government Agencies all receive information through the center and hotline. Each has one officer in charge of collecting information and delegate to relevant authorities, as well as follow-up on its resolving process. Period to reply back to citizens and solve the requests, complaints are within 30 days.

Reports are registered and posted at the website [11-11.mn](http://11-11.mn) .

#### 2. Website

##### a) Ministry of Road and Transport Development

At their official website [www.MoRTD.gov.mn](http://www.MoRTD.gov.mn) there is a button "Requests, complaints", when you press it directly it connects to where citizens can register with an account and leave information. Upon receiving information, an officer who is in charge will assort their relevance and delegate to relevant authorities. When the requests, complaints received by a relevant official, he/she must solve and reply back within the given period (usually 30 days).

##### b) Office of the President

At their official website [www.president.mn](http://www.president.mn) there is a section where citizens/entities can leave their comments only. Upon receiving comments, an officer who is in charge will assort the relevance and delegate to relevant authorities accordingly.

When filling the form citizens must include their full name, ID number, address and phone number.

#### 3. Local hotlines and complaint mechanisms managed by each local government.

The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH. To properly address SEA/SH risks, the GRM needs to be in place prior to contractors mobilizing. Any parallel GRMs operated by contractors and consultants should include processes to refer complaints to the project GRM so as to ensure that an accurate understanding of the project's complaints is always available. For GBV and particularly SEA/SH complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Some survivors will choose to seek services directly and never report to the GRM, which may lead to a discrepancy in the number of cases reported. To enable women to safely access the



GRM, multiple channels through which complaints can be registered in a safe and confidential manner can be enabled. The PMO staff and contractors are to be trained on confidentiality and effective operation of GRM.

The information in the GM must be confidential—especially when related to the identity of the complainant.