



Stakeholder Engagement Plan

Technical Assistance for Financing Framework for Rogun
Hydropower Project



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Contents

1. Introduction.....	1
2. Project Summary	1
3. Rogun HPP Summary.....	2
4. Objectives of Stakeholder Engagement Plan	6
5. Regulatory Context.....	6
5.1. Tajikistan requirements for stakeholder engagement.....	6
5.2. World Bank requirements for stakeholder engagement	7
6. Stakeholder Identification, Analysis and Communication Methods	8
6.1. Project stakeholders.....	8
6.2. Methodology for Stakeholder Engagement	8
6.2.1. Principles.....	9
6.2.2. Stakeholder Identification and Analysis.....	9
6.3. Scoping consultations.....	11
6.4. Stakeholder engagement to date.....	11
6.5. Stakeholder Categories	12
6.5.1. Affected Parties	12
6.5.2. Other Interested Parties	12
6.5.3. Vulnerable Groups.....	13
7. Stakeholder Engagement Program for Technical Assistance	13
7.1. Engagement Methods and Tools.....	13
7.2. Disclosure of Materials.....	20
7.3. Continuing disclosures and consultations	20
7.4. Grievance redress mechanism	20
8. Grievance Redress Mechanism	21
8.1. Grievance resolution process.....	22
8.2. Grievance processing.....	25
8.3. Grievance logs	26
8.4. Monitoring and reporting on grievances.....	27
8.5. Points of contact.....	27
8.6. World Bank Grievance Redress System.....	27
9. Monitoring and Reporting.....	28
10 Resources.....	29
Annex 1: List of Identified Stakeholders	29
Annex 2: Example Grievance Form	32

Abbreviations

E&S	Environmental and Social
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-based violence
GRC1	Grievance Resolution Committee
GRC2	Grievance Resolution Commission
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HPP	Hydropower Project
JSC	Joint Stock Company
KfW	Kreditanstalt für Wiederaufbau (German development bank)
LMP	Labor Management Procedures
OHS	Occupational Health & Safety
PMG	Project Management Group
POE	Panel of Experts
PPA	Power Purchasing Agreement
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
RU	Resettlement Unit
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TA	Technical Assistance
TEAS	Techno-Economic Assessment Study

Tables

Table 1 Stakeholder groups and interest in engagement.....	10
Table 2 Methods, Tools and Techniques for Stakeholder Engagement	16

Figures

Figure 1. Location of Nurek HPP	3
Figure 2. Rogun reservoir and roads.....	5
Figure 3 Schematic process of GRM mechanisms	22
Figure 4 Typical grievance resolution process	24

1. Introduction

The World Bank is considering providing technical assistance to the Government of Tajikistan in developing the Rogun Hydropower Project (HPP). The 2014 Techno-Economic Assessment Study (TEAS) and Environmental and social Impact Assessment (ESIA), financed by the World Bank, determined the project was technically and economically feasible and that environmental and social impacts would not be unacceptable if managed carefully. In addition, the 2021 Financing Options Study, also financed by the World Bank, concluded the project could provide significant economic and social benefits to Tajikistan and Central Asia, but required an updated schedule and a more realistic macro-fiscal scenario.

This Technical Assistance Project will help strengthen technical, environmental and social aspects of the Rogun HPP construction project, enable development of the commercial framework of the Rogun HPP project, and strengthen the institutional capacity of the Project Management Group for Energy Facilities Construction under the President of the Republic of Tajikistan Rogun (Rogun PMG), the implementing entity for the Technical Assistance. The Project would be implemented during the period of May 2022 (including some retroactive financing for certain key consulting services, including updating environmental and social documents, engagement of the Dam Safety Panel of Experts, and appointment of a financial and legal advisor) and December 2026. In addition, the PMG will rely upon the Directorate of the Flooding Area of Rogun HPP (known as the Rogun Resettlement Unit or RU) to manage the elements of the Technical Assistance associated with planning and implementing the resettlement program.

This document is the **Stakeholder Engagement Plan (SEP)** for the *Technical Assistance for the Rogun HPP Financing Framework*. The SEP will be implemented once the TA is approved and throughout project implementation.

2. Project Summary

The development objectives are to improve the readiness of the Rogun HPP Project to mobilize financing, improve the dam safety, and strengthen the environmental and social aspects.

PDO Level Indicators

The key PDO-level outcome indicators include:

- **Indicator One (Custom):** The Government adopts a macroeconomically sustainable financing plan for Rogun HPP Project (Yes/No). This indicator will measure the progress towards development and adoption of a macroeconomically sustainable financing plan. The macroeconomic sustainability means that the financing plan would not create risks of debt distress for the country taking into account the proposed annual capital expenditures and financing terms for those expenditures. The plan may be updated from time to time as the macroeconomic situation changes.
- **Indicator Two (Custom):** Rogun HPP Project has a functioning dam safety as well as environmental and social POEs (Yes/No).
- **Indicator Three (Custom):** The environmental and social instruments of Rogun HPP Project comply with the requirements of the World Bank's Environmental and Social Framework (Yes/No).

The Technical Assistance comprises four components:

Component 1: Development of macroeconomically sustainable financing plan and a commercial framework for Rogun HPP project. This component will finance: (a) preparation of a macroeconomically sustainable Rogun HPP Project construction completion schedule taking into account the existing and projected macro-fiscal framework of the country; (b) preparation of the Rogun HPP Project financing plan taking into account the updated construction completion schedule; (c) transaction advisory service to help the Government draft, negotiate, and sign long-term PPAs for sale of Rogun HPP electricity; and (d) additional economic and financial analysis and studies that may be required for the needs of the Rogun HPP Project.

Component 2: Improvement of the dam safety. This component will finance: (a) POE for the dam safety, which will carry out due diligence of existing design and project solutions; provide high level and professional independent advice and guidance to support objectivity and credibility in the development and implementation of designs and in the construction of the Rogun HPP Project; share technical expertise and knowledge and so contribute to dialogue amongst the various stakeholders; and (b) additional technical and engineering studies and consultancy services that may be required for various technical aspects of the Rogun HPP Project and preparation of procurement documents.

Component 3: Strengthening of environmental and social (E&S) aspects of Rogun HPP Project. This component will finance the following: (a) update of E&S instruments for Rogun HPP Project to align them with the requirements of the World Bank's Environmental and Social Framework (ESF); assistance to Rogun PMG in developing a Contractor Management Plan that will include the details of how Rogun PMG will supervise the E&S performance of its contractors; recommendations on modification of existing contracts, to include relevant E&S requirements to comply with the applicable E&S standards and requirements; (d) E&S POE; and (e) design of community benefit-sharing program that would contribute to equitable development and sustainable socio-economic growth at the local and national levels.

Component 4: Strengthening of institutional capacity of Rogun PMG and other technical assistance. This component will finance: (a) strengthening of PMG team to implement the TA Project; (b) capacity building for the Rogun PMG and Rogun JSC staff in dam safety, operation and management of hydro facilities, and project management; (c) public communication support to the Government on matters related to Rogun HPP Project; (d) Purchase of Information and Communication Technologies and office equipment for the Rogun PMG; (e) measures to address the gender gaps; (f) project financial audits; and (g) incremental operating costs of the Rogun PMG.

3. Rogun HPP Summary

Planning for a dam and hydropower project on the Vakhsh River near Rogun, Tajikistan, was initiated in the 1950s. The site is about 100 kilometers northeast of Dushanbe (Figure 1). Rogun HPP was and is intended to be the furthest upstream of a series of hydropower projects on the Vakhsh River to provide regional irrigation and hydropower to benefit all of what are now the Central Asia countries. Construction began in 1980 and was interrupted by the breakup of the Soviet Union. It began again in 2008 before being stopped again (except for maintenance activities) while technical, economic, and environmental

studies (financed by the World Bank), which were completed in 2014. Construction then started again in 2014-2015 (see sequence of construction below) and has continued since that time, financed from



Figure 1. Location of Nurek HPP

(Source: Figure 3-1 from 2014 ESIA)

Government sources.

Rogun HPP is about 100 kilometers upstream of the Nurek HPP, which has operated since the 1980s. With a height of 300 meters, Nurek is currently the highest embankment dam in the world. This position would be taken by Rogun, which is designed to be 335 meters high. The hydropower plant will become the largest in Central Asia, with a generation capacity of 3,600 megawatts and average annual generation of over 17,000 gigawatt hours. The project is expected to produce electricity for 115 years, and by intercepting sediment will extend the life of Nurek HPP.

Operation of the Rogun HPP will be consistent with existing agreements for water allocation in the Vakhsh River Basin. The agreements allocate shares of water flows to each country, as a result of which Nurek HPP, and in future Rogun HPP, stores high flows in winter for release in summer to support downstream

irrigation¹. To accommodate downstream users, the Rogun reservoir will not be filled immediately but rather over a period of approximately 16 years.

The project includes or will include the following elements:

- The dam, with construction to be in four stages:
 - Pre-cofferdam: made of large blocks and fill, this began the river diversion and allowed construction to proceed in part of the riverbed. As estimated at the time of the Techno-Economic Assessment Study, this was completed in about 28 months.
 - Cofferdam: this intermediate structure had a waterproof geomembrane element with a crest height of 1050 meters above sea level. The construction took about eight months, including one month for the pre-cofferdam.
 - Stage 1 dam: an intermediate stage of the full dam to allow early electricity generation. It was designed to be 1110 meters above sea level, extending 660 meters from end to end. Overall construction to date has taken approximately 48 months and the elevation has reached 1070 meters.
 - Full-height dam: rockfill dam with an impervious clay core, with a reservoir at 1290 meters above sea level and dam crest at 1300. Construction is underway at present and is estimated to be completed in about 2029, 163 months from the start of construction.
- Three diversion tunnels (CT1, CT2, and CT3) to carry water around the dam site while works are completed. Downstream parts will be used as for the tailrace. “Preconstruction” works for these and other tunnels noted in subsequent bullets were underway in early 2021.
- Surface spillway, two mid-level and two high-level (HLO1 and HLO2) tunnels to protect the dam and allow safe passage of floodwaters up to the Probable Maximum Flood (PMF), with the surface spillway needed when the reservoir ultimately fills with sediment.
- Six headrace tunnels and penstocks will guide water from the intakes to the powerhouse.
- Several access tunnels will allow access to the powerhouse, gate chambers, etc.
- Underground powerhouse (220 x 70 x 20 meters) and transformer room (200 x 40 x 20 meters) in excavated caverns. The powerhouse will contain six 600-megawatt turbines. As noted, one 200MW turbine is currently in place and operating.
- Several transmission lines were proposed by the Techno-Economic Assessment Study. None were evaluated in the ESIA but were to be evaluated separately. They were not considered in the current review.

¹ In previous years and at present, Tajikistan has not used its full share of waters. In the years during which the reservoir is being filled, however, Tajikistan will use its full share.

- Two access roads, one on each bank, with one in the lower reservoir and one in the upper. Three other roads that will be submerged had previously been assessed for replacement and are not considered part of the Rogun project. The roads identified as #4 and #5 in Figure 2 were considered to be part of the project but were not evaluated in the 2014 ESIA; the others were not considered part of the project. None were considered in the current review.



Figure 2. Rogun reservoir and roads

(Source: Figure 3-1 from 2014 ESIA)

- A reservoir that will extend from the dam for 70 kilometers upstream (Figure 2). The reservoir will flood an area of 170 square kilometers at full supply level and 51 square kilometers at minimum operating level. Maximum storage capacity will be 10.3 billion cubic meters. The terrain is mountainous so the reservoir will flood several side valleys. The reservoir will be filled over a period of 20 years, until about 2036.

By 1991, most site preparation works and about 70 percent of the underground works (access tunnels, penstocks, diversion and outlet tunnels, powerhouse cavern) had been completed. A flood in 1993 resulted in partial collapse of diversion tunnels and overtopping of the initial cofferdam, and an earthquake in 1995 caused further damage. This in turn led to a new feasibility study in 2000 for the Stage 1 project and further design works. The World Bank then financed the Techno-Economic Assessment Study to evaluate the technical and economic validity of the project, including the ability to incorporate the works that had already been completed into the final project.

At present, contractors have been appointed and are on site for three of the four lots: electromechanical works (Lot 1), construction of the main dam (Lot 2), spillway and flood-handling tunnels (Lot 3). The contractor for Lot 4, headrace tunnels and associated works, has not yet been appointed.

A total of 77 villages were found to be within the future footprint of the reservoir and project sites, and this was predicted to require about 42,000 people to be resettled. Since construction and reservoir filling were to take 16 years, resettlement was proposed to take place in two phases, each with its own Resettlement Action Plan. Resettlement began in the 1980s but then slowed or stopped when construction was interrupted. The Phase 1 resettlement program involved relocation of six villages and fewer than five percent of the total households that will ultimately be resettled. This phase was completed under a Phase 1 Resettlement Action Plan prepared with World Bank financing. The Phase 2 program is in its early stages and will involve several stages before completion in the early 2030s.

4. Objectives of Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the implementation of the Technical Assistance. The SEP identifies the different interested and affected stakeholder groups and approaches for reaching these groups. Overall, the SEP serves the following purposes: i) stakeholder identification and analysis; (ii) planning engagement modalities including effective communication tool for consultations and disclosure; and (iii) enabling platforms for influencing decisions; (iv) defining roles and responsibilities of different actors in implementing the Plan; and (iv) Grievance Mechanism (GM). It is expected this SEP will be implemented in conjunction a separate SEP for the entire Rogun HPP construction project, which would be prepared as part of Component 3 of the Technical Assistance Program.

The present SEP outlines the ways in which Rogun HPP will communicate with stakeholders and includes a mechanism by which interested parties and organizations can raise concerns, provide feedback, or make complaints about Rogun HPP and the overall Technical Assistance program.

5. Regulatory Context

5.1. *Tajikistan requirements for stakeholder engagement*

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

- The Environmental Protection Law establishes the right of citizens to live in a favorable environment and to be protected from negative environmental impacts (Article 12). Citizens also have the right to environmental information (Article 13) as well as to participate in developing, adopting, and implementing decisions related to environmental impacts (Article 13). The latter is assured by public discussion of drafts of environmentally important decisions and public ecological reviews. Public representative bodies have an obligation to take into consideration citizens' comments and suggestions.
- The Law on Environmental Expertise (art. 7) also provides the rights to citizens to conduct a Public Environmental Expertise (that is, a public environmental review). This law also empowers local authorities to facilitate public hearings, questionnaires, and referendums regarding planned activities that are subject to ecological expertise. On 17 July 2001, Tajikistan acceded to the 1998 Aarhus Convention, the provisions of which have priority over domestic law that stipulates the rights for Public Environmental Expertise.

5.2. *World Bank requirements for stakeholder engagement*

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

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

- "Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project."
- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts."
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not."

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

environmental and social performance of the project and to have those concerns addressed in a timely manner.

It is noted that the Technical Assistance itself does not involve significant risks and impacts. However, since the successful completion of the Assistance could be associated with continued construction and ultimate operation of a major hydropower project, this SEP contemplates an extensive engagement program.

6. Stakeholder Identification, Analysis and Communication Methods

6.1. *Project stakeholders*

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

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

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

6.2. *Methodology for Stakeholder Engagement*

6.2.1 Principles

In order to meet best practice approaches, the following principles for stakeholder engagement form the basis of the SEP:

- Openness and life-cycle approach: public consultations should be arranged for all development initiatives during the whole life-cycle, carrying them out in an open manner, free of external manipulation, interference, coercion or intimidation;
- Informed participation and feedback: information should be provided to and widely distributed among all stakeholders in an appropriate format; opportunities should be provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns, for improving management decisions based on public feedback (where relevant), and also building long-term relations;
- Inclusiveness and sensitivity: stakeholder identification should be undertaken to support better communications and build effective relationships. The participation process should

be inclusive, not exclusive. All stakeholders should be encouraged being involved in the consultation process. Equal access to information should be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention should be given to vulnerable groups.

6.2.2 Stakeholder Identification and Analysis

In developing the Technical Assistance and the SEP, potential stakeholders were identified, mapped, and analyzed. The following criteria, adjusted to take account of local specific conditions, were used to identify stakeholders:

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

This Technical Assistance will not involve direct effects on any persons or communities, but its outcome may affect future development of Rogun HPP, which would have direct effects. As noted previously, one of the elements of Component 3 will be development of a SEP for the updated Environmental and Social Impact Assessment (ESIA) and Phase 2 Resettlement Action Plan (RAP) as well as a series of associated studies that will better define the risks and impacts of the project and will identify measures to avoid or reduce those impacts. That SEP will necessarily identify all parties who could be affected by the Rogun HPP project or would otherwise be interested in the project, and will require consultations with those stakeholders.

A general list of potential stakeholder groups identified is presented in Table 1 below. It is considered that most stakeholders in Table 1 would be of most concern to those involved in or interested in actual implementation of the studies and planning called for by the Technical Assistance, not for the Technical Assistance itself. Thus, the key stakeholders for the Technical Assistance itself are shown in italics.

Table 1 Stakeholder groups and interest in engagement

<i>Stakeholder group</i>	<i>Interest/cause in engagement</i>
<i>International</i>	
Environmental and societal NGOs	Scientific understanding of the range or problems associated with the project(s).
<i>International finance institutions</i>	Potential future financing
<i>Riparian countries</i>	<ul style="list-style-type: none"> – Potential beneficiaries of power and water management improvements – Potential contributors to financing
<i>National</i>	
<i>Government of the Republic of Tajikistan</i>	<ul style="list-style-type: none"> – Legislative and executive authorities. – Functions of supervision and monitoring
<i>Resettlement Unit</i>	Planning and implementation of resettlement program
NGOs	Specialized, interest in representing the interests of different interested parties
Mass media	Intermediaries for informing the general public about planned activities and information disclosure in connection with project developments).
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.) Benefit from stable electricity supply
<i>Rogun HPP contractors</i>	<ul style="list-style-type: none"> – Directly affected by decisions regarding financing, continued construction, changes in contract terms – Technical understanding of the range or issues associated with Rogun HPP, including financial issues
Rogun HPP and RU employees and contract employees	Directly affected by decisions regarding financing and continued construction
<i>Local</i>	
Administration of Rogun town	Represent affected people and pool of potential employees
Population of Rogun town	<ul style="list-style-type: none"> – Employment opportunities – Pressure on community services
Other local communities	Interested parties living in areas that could provide employees or services
Administrators of villages to be resettled	Represented people to be affected in future
Local authorities in resettlement village (already fully or partly occupied)	Represent people already affected, responsible for infrastructure and other elements of villages
Households previously resettled or planned to be resettled	Actual and potential impacts on livelihoods nad

Over the course of the Technical Assistance, the SEP under Component 3 will be more concerned with members of the public and affected people, while the current SEP for the Technical Assistance itself will

be more concerned with institutional stakeholders, including potential financiers and government agencies, particular once the other SEP is being implemented.

6.3. *Scoping consultations*

There could be some limited scoping consultations on environmental and social instruments that are being updated, such as the 2014 ESIA/ESMP, RAP and related documents. These would focus on additional risks and impacts, such as labor issues, OHS, biodiversity impacts, additional land acquisition and/or incremental restrictions on land use and/or involuntary resettlement and community health and safety issues.

The project may end up preparing a new ESIA/ESMP and/or RAPs, in addition to Labor Management Procedures, a Resettlement Policy Framework (RPF), Biodiversity Management Plans to be included in the ESIA and a Stakeholder Engagement Plan (SEP). Scoping consultations will focus on new or changed risks affecting the project, taking into account the additional requirements of the World Bank ESF. These may include labor issues (i.e. workers' camps, labor influx), OHS, biodiversity impacts, additional land acquisition and/or incremental restrictions on land use and/or involuntary resettlement, livelihood restoration, impacts on vulnerable groups and community health and safety risks (including GBV/SEA/SH, traffic management, communicable diseases, security management issues, etc.).

6.4. *Stakeholder engagement to date*

Throughout 2021 and 2022 to date, representatives of the World Bank and Rogun have met with several categories of stakeholders concerning elements of this Technical Assistance, including:

- National authorities: Between September and November 2021, the Bank and the Rogun HPP teams met the President of Tajikistan, Prime Minister, Deputy Prime Ministers, Minister of Finance, Minister of Energy and Water Resources, Director of Rogun JSC, Director of Rogun PMG and technical staff. Discussions focused on the technical studies for the dam and financing. [Summary of consultations to be completed]
- International Finance Institutions: The following have been involved in technical discussions about the project: European Union, European Investment Bank, Asia Infrastructure Investment Bank, Asian Development Bank, US Agency for International Development (USAID) and US Embassy, Islamic Development Bank, Islamic Corporation for the development of the private Sector, Eurasian Development Bank, Kuwait Fund for Arab Economic Development, Saudi Fund for Development, UK Foreign, Commonwealth and Development Office, European Bank for Reconstruction and Development and Kreditanstalt für Wiederaufbau (KfW, German development bank). [Summary of consultations to be completed]

Not described here are extensive consultations held in 2014 and thereafter concerning the 2014 ESIA and the ongoing resettlement program since they were not directly associated with the Technical Assistance. However, it is important to note that those consultations included individual, institutional, and governmental stakeholders at the local, regional, national, and international levels.

6.5. Stakeholder Categories

In general, stakeholders can be divided into two categories: affected parties and other interested parties. In addition, affected parties are further separated into those who would be positively affected, those who could be adversely affected, and those who may be vulnerable to disproportionate adverse effects or further disadvantaged by the project.

Engagement with stakeholders will help ensure their greatest possible contribution to the successful implementation of the Technical Assistance and will allow Rogun HPP to draw on their expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project(s) by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

6.5.1. Affected Parties

The affected parties would include those shown in italics in Table 3. These would include those who would be most interested in the Technical Assistance itself:

- International Finance Institutions who may provide financing to Rogun HPP. These may include the World Bank (as Coordinator), European Union, the European Investment Bank, the Asian Infrastructure Investment Bank, the Asian Development Bank, the United States Agency for International Development and the U.S. Embassy, the Islamic Development Bank, the Islamic Corporation for the development of the private Sector, the Eurasian Development Bank, the Kuwait Fund for Arab Economic Development, the Saudi Fund for Development, the UK Foreign, Commonwealth and Development Office, the European Bank for Reconstruction and Development, and KfW.
- Government of the Republic of Tajikistan, including the Ministry of Finance, Ministry of Energy and Water Resources, Environmental Protection Committee, and the Resettlement Unit.
- Other riparian countries, including Afghanistan, Kyrgyzstan, Turkmenistan, and Uzbekistan.
- Contractors and others who are economically involved in the project at present who have an interest in the continued construction and future operation of Rogun HPP.

6.5.2. Other Interested Parties

Other stakeholders would include those who would not be directly affected but may have an interest in project. These could include:

- Residents of the other rural settlements in the surrounding area, who can benefit from employment and training opportunities stemming from the project.
- Civil society groups and NGOs on the regional, national and local levels, that pursue environmental and socio-economic interests.

-
- Business owners and providers of services, goods and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future.
 - Residents of Tajikistan and other countries who could benefit from an improved and/or more economical electricity supply.

As noted, these interested parties would be more concerned with engagement during and after preparation of the updated ESIA and RAP rather than the Technical Assistance.

6.5.3. Vulnerable Groups

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals and groups in public consultations and other engagement forums established by the project. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals or natural resources, etc.

Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project Area of Influence, the vulnerable groups may include, but are not limited to, the following:

- Elderly people and veterans of war.
- Persons with disabilities.
- Low-income families, including those dependent on state support.
- Women-headed households or single mothers with young children.
- Unemployed persons.
- Ethnic minorities/religious/linguistic minorities

Vulnerable groups within the communities affected by the project will be further confirmed and consulted as part of the Component 3 SEP, as appropriate, and not as part of the Technical Assistance.

7. Stakeholder Engagement Program for Technical Assistance

This section describes stakeholder engagement activities that will be implemented by Rogun HPP for the Technical Assistance.

7.1. Engagement Methods and Tools

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

The format of every consultation activity should meet general requirements on accessibility. That is, they should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e., with due respect to the local customs and norms), and inclusiveness (i.e., engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals). If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

If there are vulnerable individuals and groups involved in consultations on the Technical Assistance, tailored techniques may be required. Since their vulnerable status may lead to people's diffidence and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings.

Various methods of engagement can 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. The following approach will be used for consultations:

- Announcement will be placed in public media for public consultations (if any), including newspaper, local notice boards, radio, and possibly television; and announcements via email and telephone calls for more focused meetings, such as with international financial institutions or government agencies. Announcements would be made well in advance to allow time for planning.
- Methods of communication will be tailored for the participants. Public meetings would primarily involve oral communication, while focused meetings may involve more written materials. Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows 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.
- Placement of the project materials in the public domain would also be accompanied by making available a register of comments and suggestions that can be used 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.

An attendance list will be made available at the commencement of each 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.

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, 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 written minutes of the meeting by a specially assigned person or a secretary;
- Audio recording (e.g., by means of voice recorders); and
- Photographing (with due regard for privacy preferences).

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, video recording may be used. A combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records.

It can also be useful to ask participants to complete evaluation (feedback) forms, which would give them an opportunity to express their opinions and make suggestions. This is particularly helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in public. A summary description of the engagement methods and techniques that may be used is provided in Table 2 below. It is noted that most of the methods described will be used under the Component 3 SEP, with simplified methods used for the Technical Assistance itself.

Table 2 Methods, Tools and Techniques for Stakeholder Engagement

<i>Method / Tool</i>	<i>Description and Use</i>	<i>Contents</i>	<i>Dissemination Method</i>	<i>Target Groups</i>
Information Provision				
Distribution of printed public materials: leaflets, brochures, fact sheets	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 the audience. Information may be presented both in Russian and Tajik for local and national stakeholders, and in English for international audience.	Distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders Placement at the offices of local administrations, libraries, and other public venues.	All stakeholders Once during TA, then under Component 3 SEP
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to stakeholders as needed to maintain awareness of the Project development.	Important highlights of the Technical Assistance, announcements of planned activities, changes, and overall progress.	Circulation of newsletter or update sheet with a specified frequency. Means of distribution – post, emailing, electronic subscription,	All stakeholders Once during TA, then under Component 3 SEP
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events General description of the Project and its benefits to the community.	Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience	All stakeholders Once during TA, then under Component 3 SEP

<i>Method / Tool</i>	<i>Description and Use</i>	<i>Contents</i>	<i>Dissemination Method</i>	<i>Target Groups</i>
Visual presentations	Visually convey information	Descriptions of the Technical Assistance and other relevant information	Meetings	Meeting participants
Public meeting	Meeting open to the public	Information on the TA and on the current status of Rogun HPP and request for feedback	<p>Presentation, then open floor for comments and questions</p> <p>Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media.</p> <p>Targeted invitations to be sent out to known stakeholders.</p> <p>Public disclosure of materials and associated impact assessment documentation in advance of the hearing.</p>	<p>All stakeholders</p> <p>Under Technical Assistance, single public meetings in Dushanbe and in Rogun</p> <p>Subsequent consultations would occur under Component 3 SEP</p>
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific activities, changes to scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by employees and residents of Rogun	Rogun HPP employees, local residents Will be part of Component 3 SEP
<i>Information Feedback</i>				
Information repositories accompanied by a feedback mechanism	Placement of Rogun -related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to	Various Project-related materials, ESMF 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 and permanently.	All stakeholders Will be part of Component 3 SEP

<i>Method / Tool</i>	<i>Description and Use</i>	<i>Contents</i>	<i>Dissemination Method</i>	<i>Target Groups</i>
	leave their comments in a feedback register.			
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection.	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers provided on the printed materials distributed to stakeholders and mentioned during meetings. Designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	All stakeholders Will be part of Component 3 SEP
Internet/Digital Media	Launch of website to promote various information and updates on the overall Rogun Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in two languages – Russian for the local and national audience, and in English for international stakeholders.	Information about developer and shareholders, development updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.	A link to the web-site should be specified on printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc.	All stakeholders Will be part of Component 3 SEP

<i>Method / Tool</i>	<i>Description and Use</i>	<i>Contents</i>	<i>Dissemination Method</i>	<i>Target Groups</i>
Feedback & Suggestion Box	<p>A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project.</p> <p>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.</p>	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	<p>Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community.</p> <p>Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.</p>	<p>Any stakeholder</p> <p>Will be placed under Component 3 SEP</p>

7.2. *Disclosure of Materials*

A description of the Technical Assistance proposed to be provided will be posted on the Rogun HPP and World Bank websites, and paper copies will be available at their respective offices in Dushanbe. In addition,

It is noted that under the various Components of the Technical Assistance, and under the Component 3 SEP, many different documents will be disclosed, including the updated ESIA, the Phase 2 RAP, and a number of studies required under Component 3 of the Technical Assistance. In addition, studies completed under Components 1 and 2 will also be disclosed on the websites, although some portions may be withheld as confidential (e.g., portions of the project financing plan). Finally, certain information under Component 4 will be disclosed if required by Tajikistan law.

Specifically for the environmental and social information under Component 3, free printed copies of the documents, in Russian and Tajik, will be made accessible at the following locations and electronic versions will be made available on the Rogun HPP and World Bank websites:

- The Rogun HPP Project office in Dushanbe.
- Rogun town administrations offices.
- Municipal administrations of the District.
- Regional administrations
- Other designated public locations to ensure wide dissemination of the materials.

This SEP will remain in the public domain for the entire period of Rogun HPP development but will not be updated once the Component 3 SEP is in place.

7.3. *Continuing disclosures and consultations*

For purposes of this Technical Assistance SEP, consultation will involve only the key stakeholders identified in Table 1. During and after preparation of the Component 3 SEP, consultations will be held with other stakeholders as specified in that SEP. Except for making available a grievance redress mechanism, as described below, outreach to other stakeholders will take place under the Component 3 SEP.

7.4. *Grievance redress mechanism*

In compliance with the World Bank's ESS10, a mechanism is being set up to handle complaints and issues, and this will be in addition to the normal Jamoat-and village-level processes that are available to citizens of Tajikistan. Dedicated communication materials (specifically, a brochure or pamphlet) will be developed to help interested parties become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be posted at the Rogun HPP project site, at the Rogun town offices, in the main contractor camp at Rogun, at Rogun and Resettlement Unit offices in Dushanbe, and at the World Bank office in Dushanbe. Rogun HPP will check boxes on at least a weekly basis and will maintain a grievance register to capture and track grievances from submission to resolution and communication with complainants. Rogun HPP's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by Rogun HPP. If that is not successful in resolving grievances, they will be referred to a committee at the Jamoat level. The mechanism is described in detail in the next Chapter, which includes a form that can be used to submit grievances. Grievances may be submitted anonymously, but in that case it cannot be known if the complainant is satisfied with the resolution.

8. Grievance Redress Mechanism

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

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

The GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. External stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the project, including the resettlement and compensation program. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. A separate mechanism is already available to Rogun and contractor employees, who are internal stakeholders, and this will continue to be implemented separately, not part of the Technical Assistance. It includes an uptake channel for sensitive and confidential complaints, such as those related to SEA/SH.

Rogun HPP will be responsible for managing the stakeholder GRM. Typical grievances for hydropower and construction projects would be submitted under the existing mechanism implemented at Rogun town. Under this Technical Assistance, issues could include those related to hydropower development in general and specifically at Rogun, which could include:

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

In addition, there could be grievances specific to the Technical Assistance, related to the desirability of financing the project, or with various materials prepared under the various Components.

The GRM will be in place and operational from the time of Technical Assistance effectiveness until the formal mechanism is established under the Component 3 SEP.

The project GRM will include three successive tiers of extra-judicial grievance review and resolution:

- The first tier will be the Rogun HPP E&S team. They will deal quickly with issues that can be quickly resolved, and would always involve direct communication with the person(s) who submitted the grievance.
- The second tier will be a Grievance Resolution Committee (GRC1) that includes representatives of Rogun HPP and of the complainant's village and Jamoat. The GRC1 will deal with issues that could not be resolved in the first tier.
- The third tier will be a Grievance Redress Commission (GRC2) that included one or more senior Rogun HPP managers and one or more Jamoat and/or village leaders. GRC2 will resolve issues that could not be resolved by GRC1.

Grievances would be handled as described in the following subsection.

8.1. *Grievance resolution process*

Information about the GRM will be publicized as part of the initial consultation meetings in Dushanbe and Rogun. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the Rogun HPP website.

The overall process for the GRM will include six steps, as shown on Figure 3 and described below. This builds on the way grievances are typically managed, which is illustrated in Figure 4 .



Figure 3 Schematic process of GRM mechanisms

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

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, jamaat, project, and Rogun offices) and at project sites, and by mail, telephone, and email.
- **Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Community Liaison Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the HSE Department for processing and resolution. The Department will assign one individual to be responsible for dealing with each complaint, including following through within Rogun HPP and with the complainant to arrive at a resolution, with the goal to resolve complaints within 15 days of receipt.
- **Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. If complaints are not resolved within 15 days, the responsible person will provide an update about the status of the complaint/question to the complainant and again provide an estimate of how long it will take to resolve the issue. In addition, the HSE Department will

report to the General Director every two weeks on grievances that have remained unresolved for 30 days or more.

- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional compensation or assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The HSE Department will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions. Typical grievance resolution process is shown on Figure 4.
- **Step 6: Providing Feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through avenues afforded by the Tajikistan legal system. On a monthly basis, the HSE Department will report to the General Director on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

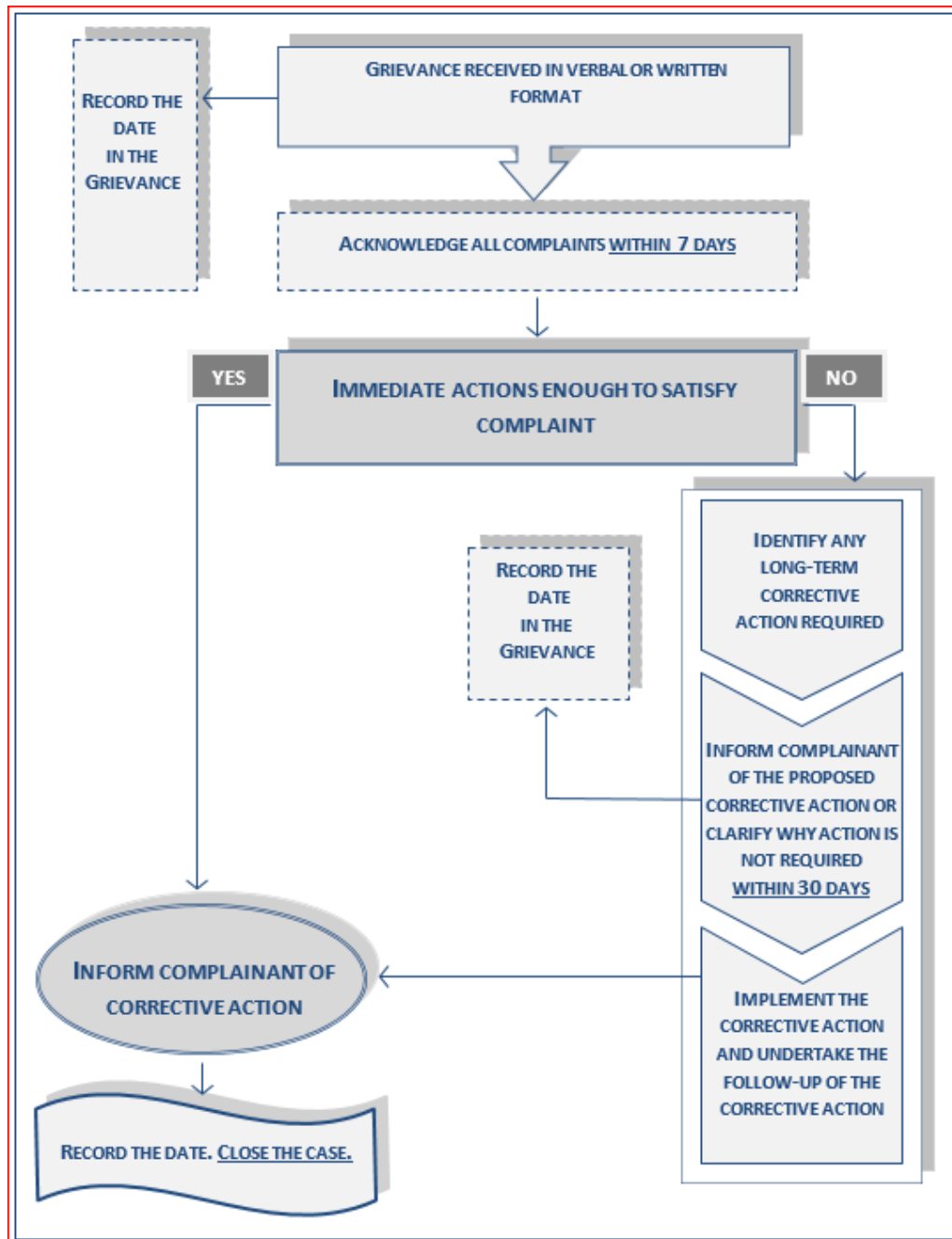


Figure 4 Typical grievance resolution process

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

- Determination of proposed resolution or referral to second tier:
 - If resolution is proposed: referral to E&S manager for review and approval (including refinements). Once approved, responsible person would communicate resolution to complainant and refer to corporate management for implementation.

- If referred to second tier, GRC1 would consider facts determined by initial review and conduct such other fact-finding as needed, including interviews of complainant and others if necessary.
- GRC1 recommends resolution or refers to GRC2:
 - If resolution is proposed: referral to Rogun HPP for implementation, including communication to complainant.
 - If referred to third tier, GRC2 to meet and discuss facts as determined by initial tiers and make determination of proposed resolution.
- GRC2-recommended resolution: referred to Rogun HPP for communication to complainant and implementation of recommended actions (if any)
- Complainant would be asked to acknowledge acceptance (or rejection) of the resolution.
- Rogun HPP would then implement actions that are part of the resolution (if any).

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

8.2. *Grievance processing*

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

- By completing a written grievance form that will be available on the Rogun HPP website and office and at Rogun HPP and Rogun town offices. An example of a grievance registration form is provided in Annex 2.
- By contacting the Rogun PMG by email, telephone, or in person. Grievances can be submitted to:

Mr. Pulod Muhiddiniyon
Director
Projects Management Group for Energy Facilities Construction under the
President of the Republic of Tajikistan
5/1 Shamsi str., 6th floor,
734064 Dushanbe
Tel: (+992 37) 235 74 17
grpsgs@mail.ru
grpsgs@gmail.com
- Grievances received verbally will be recorded by a designated representative of the PMR on a grievance registration form and logged into the Grievance Register. A copy of the logged grievance will be given to the complainant, giving them the opportunity to alert Rogun HPP if the grievance has not been noted down correctly.

Rogun HPP will explain to stakeholders the possibilities and ways to raise a grievance during consultation meetings when this draft SEP is disclosed and then at quarterly meetings thereafter. As noted, the GRM procedures will also be disclosed through the Rogun HPP and will also be described in a brochure or pamphlet made available as described above.

PMG will designate an individual to responsible for logging and tracking grievances. As noted above, one person will be assigned responsibility for investigating and recommending resolution to each grievance, or to recommend referral to GRC1.

All grievances will be acknowledged within seven days and resolved as quickly as possible. If there has been no resolution within 30 days, the person assigned responsibility for the grievance will contact the complainant to explain the reason for the delay. A generic flow chart for registering and processing grievances is shown in Figure 4.

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

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

8.3. *Grievance logs*

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

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

- Date when the resolution is implemented (if any).

8.4. *Monitoring and reporting on grievances*

Details of monitoring and reporting are described above. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the PMG.

8.5. *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 villages crossed by the line. Information can also be obtained from Rogun HPP offices in Dushanbe.

The point of contact regarding the stakeholder engagement program at Rogun HPP:

Mr. Pulod Muhiddiniyon
 Director
 Projects Management Group for Energy Facilities Construction under the President of the
 Republic of Tajikistan
 5/1 Shamsi str., 6th floor
 734064 Dushanbe
 Tel: (+992 37) 235 74 17
grpsgs@mail.ru
grpsgs@gmail.com

8.6. *World Bank Grievance Redress Service*

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

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

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

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

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

9. Monitoring and Reporting

As noted, the Stakeholder Engagement Plan will be revised and updated if needed until the Technical Assistance is complete and the Component 3 SEP is in place.

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.

10. Resources

The project provides resources for staffing the stakeholder engagement process and GRM. A detailed budget is forthcoming.

Annex 1: List of Identified Stakeholders

International Finance Institutions Technical Coordination Group

<i>No</i>	<i>Institution</i>	<i>Contacts</i>
1	World Bank (Coordinator)	Arthur Kochnakyan: akochnakyan@worldbank.org Farida Mamadaslamova: fmamadaslamova@worldbank.org
2	European Union	Marilyn Josefson: Marilyn.JOSEFSON@eeas.europa.eu Marc Buchmann: Marc.BUCHMANN@eeas.europa.eu
3	European Investment Bank	Adam Bruun: a.bruun@eib.org
4	Asian Infrastructure Investment Bank	Emil Zalinian: emil.zalinian@aiib.org Komron Rajabiyon: komron.rajabiyon@aiib.org Hong Wei: consultant.hong.wei@aiib.org
5	Asian Development Bank	Joonho Hwang: jhwang@adb.org Shanny Campbell: scampbell@adb.org Levan Mtchedlishvili: lmitchedlishvili@adb.org Yun Ji Suh: ysuh@adb.org
6	USAID and US Embassy	Peter Riley: priley@usaid.gov Patrick Meyer: pmeyer@usaid.gov Jason Monks: monksjj@state.gov Bill Hall: whall@usaid.gov
7	Islamic Development Bank Islamic Corporation for the development of the private Sector	Ibrahim Shoukry: ishoukry@isdb.org Hussain Mogaibel; HMugaibel@isdb.org Edzwan Redza Anvar: eanwar@isdb.org Daniyar Abylkhan; DAbylkhan@isdb.org Mr. Ikbal Daredia: IDaredia@isdb.org Samir Taghiyev: STaghiyev@isdb.org
8	Eurasian Development Bank	Yerlan Aliyaskarov: aliyaskarov_y@eabr.org
9	Kuwait Fund for Arab Economic Development	Fawaz Al-Adasani: FALADASANI@KUWAIT-FUND.ORG
10	Saudi Fund for Development	Mohammed Almasoud: Almasoud@sfd.gov.sa
11	UK Foreign, Commonwealth and Development Office	Mirza Jahani: mirza.jahani@fcdo.gov.uk
12	European Bank for Reconstruction and Development	Jamshed Rahmonberdiev: RahmonBJ@ebrd.com Rika Ishii: IshiiR@ebrd.com
13	KfW	Dr. Andreas Schneider: Andreas_2.Schneider@kfw.de Manuchehr Bakoev: Manuchehr.Bakoev@kfw.de

National Stakeholders

Organization/ Entity	Contact Details	Description
Committee for environment protection under the Government of Tajikistan	<i>Due to changes in the government of the Republic of Tajikistan the information below is not full and may be altered.</i> Chair: Sheralizoda Bahodur Ahmadjon 734034, Dushanbe, Shamsi street, house 5/1 Phone: (+992 37) 2364059 Fax: (+992 37) 2361353 Website: http://www.tajnature.tj E-mail: info@tajnature.tj	The committee's major duty is the implementation of public policy in the field of environmental protection, protection of forestry, securing protected natural areas, hydrometeorology, rational resource use Besides, the committee has a function of control over environmental protection practice and use of natural resources.
Ministry of Finance	[To be completed]	
Ministry of energy and water resources	<i>Due to changes in the government of the Republic of Tajikistan the information below may be outdated:</i> First Deputy Chair: Sulton Rahimov 734012, Dushanbe, Rudaki avenue, house 22 Phone- 935282222 http://www.minenergoprom.tj/	The ministry is in charge of developing and implementing policies in the field of energy and water resources.
Ministry of economic development and trade Министерство экономического развития и торговли	<i>Due to changes in the government of the Republic of Tajikistan the information below may be outdated.</i> Dushanbe, Bokhtar street, house 37 Shukhrat Yusufovitch Murodov, head of secretary department Phone: (+992 37) 221-51-32 Website: www.medt.tj Муродов Шухрат Юсуфович, Начальник Управления Секретариата Phone: (+992 37) 221-51-32 Вебсайт: www.medt.tj	Ministry develops public policy in the field of social-economic sector, implements public policy, norms and regulations in the field of analysis and development of strategies of social-economic development of the country.
Directorate of the Flooding Area of Rogun HPP (Resettlement Unit)	[To be completed]	Responsible for developing and implementing the Phase 2 resettlement and livelihood restoration program.

Annex 2: Example Grievance Form

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