

Stakeholder Engagement Plan

Resilient Transport Project (P166991)

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1 INTRODUCTION

1.1 Introduction to this plan

This Stakeholder Engagement Plan (SEP) defines a programme for stakeholder engagement for the Resilient Transportation Project (RT) being implemented by the Department of Works and Highways (DOWH). This SEP was developed during the initial design phase of the project and will be implemented in accordance with the Government of PNG (GoPNG) and the World Bank's requirements for stakeholder engagement.

1.2 Project Description

The proposed project aims to improve the quality of the road network and provide road users the benefit of a better and safer network.

Components and activities include:

- **Component 1: Improvement and Sustainable Maintenance of Ramu and Hiritano Highways**
 - i) Rehabilitation and reconstruction of critical sections of the Ramu Range section of the Ramu Highway (approx. 45km), and improvement and performance-based maintenance of the full length of the highway (approximately 175km) from Pompaquato bridge in Morobe Province to Madang airport junction in Madang Province;
 - ii) Rehabilitation and performance-based maintenance on the Hiritano Highway as a continuation of the Second Road Maintenance & Rehabilitation Project (RMRP2) (P119471) which will end in April 2023. The scope of this work will be dependent on available funding, however it is anticipated to include rehabilitation and maintenance between Laloki River and Brown River (approx 24 km).

Component 1 will also include road safety strengthening activities including improved road conditions, better implementation of road safety regulation and improved quality and safety of pedestrians' facilities, by implementing targeted traffic safety campaigns and awareness measure with the focus on needs of women traders working in adjacent markets and school children who use the road as pedestrians; as well as activities focusing on strengthening and the empowerment of women through increased participation in the labour force.

- **Component 2:** Institutional Strengthening, Project Management & Technical Assistance which would finance the establishment and operating costs for a Project Implementation Unit within DOWH, as well as a range of institutional strengthening initiatives and technical assistance to support management and technical skills development
- **Component 3:** Contingency emergency response component (CERC) to support post-disaster recovery such as impacts from extreme weather events, earthquakes or pandemics.

Further detail is provided in the Preliminary Environmental and Social Impact Assessment (P-ESIA).

1.3 Stakeholder Engagement Purpose and Objectives

The **purpose** of public consultation and community engagement is to:

- inform stakeholders about the proposed activities;
- gather feedback on the design and how the proposal may affect them;

- provide notification prior to construction activities and;
- to gauge the effectiveness of mitigation measures once implemented.

This SEP describes the stakeholder engagement activities that are proposed for the RT Project. The SEP is a useful tool for managing communications between DOWH and its stakeholders.

This SEP should be considered a 'living document' that DOWH will review and update where relevant, in relation to the specific annual Project work plans. The P-ESIA further outlines public consultation and information dissemination aspects. .

The Project will be implemented in accordance with relevant PNG laws and the World Bank's Environmental and Social Framework (ESF). The ESF requires all World Bank Borrowers to comply with the Environmental and Social Standards (ESSs) for identifying, assessing and managing potential environmental and social risks and impacts associated with investment projects. *ESS10: Stakeholder Engagement and Information Disclosure* articulates that the borrower will engage with stakeholders throughout the duration of the Project (refer Section 2.2)

The key objectives of the SEP for this Project are as follows:

- Provide guidance for stakeholder engagement such that it meets the requirements of the GoPNG and World Bank ESS10
- Identify and analyse key Project stakeholders, including affected parties (including indigenous peoples), interested parties and vulnerable groups;
- Outline an inclusive and culturally sensitive stakeholder engagement process that begins early in the planning process, providing stakeholders with an opportunity to influence Project planning and design, and continues during construction and operation & maintenance phases;
- Identify the most effective methods and structures through which to a) disseminate Project information and for the Project to respond to feedback and b) to ensure regular, accessible, transparent and appropriate consultation;
- Outline the Grievance Mechanism (GM) for the Project which can address stakeholder concerns and provide feedback to issues raised.
- Outline implementing arrangements including roles and responsibilities and budget; and
- Describe means of reporting and disclosure of key information and instruments in a manner that can be readily understood by all key stakeholders.

Potential communications challenges (for example, over consultation, confusion with other Projects, COVID-related communication barriers) and opportunities (for example, synergies with other consultation activities and facilitators known to the community) will be identified.

2 Legal and other Requirements

2.1 Key Papua New Guinea laws, regulation and policy

Outlined below is a summary description of current GoPNG legislation and key Department of Works policy regarding citizens' access to information and participation:

- The National Goal 2 (6) of the *Constitution of the Independent State of Papua New Guinea 1975* requires the “maximisation of the number of citizens participating in every aspect of development.” Further, under Section 51, citizens have the right to access information.
- Under the *Environment Act 2000*— where a permit is issued, this permit includes conditions regarding engagement. For example, identification of issues that may arise within the Project and surrounding area that are direct or indirect outcomes of the physical, biological or socio-economic effects of the proposed development activity
- The *National Cultural Property (Preservation) Act 1965* and associated regulations are prescriptive with respect to engagement and notification with respect to notifications of discoveries of cultural properties and artefacts.
- The *DOWH Safeguards Policy 2019* outlines inclusiveness as one of four safeguard principles to guide the management of DOWH programs and projects during their implementation. Specifically, the Policy outlines that ‘meaningful stakeholder engagement is an inclusive process conducted throughout the project life cycle that recognises how local knowledge and experience can be used to enhance benefits’ (paragraph 17b).

2.2 World Bank

ESS10: Stakeholder Engagement and Information Disclosure recognises ‘the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice’.

ESS10 requires the borrower to

- Conduct meaningful consultation throughout the project life cycle that: begins as early as possible in the project development process, that encourages and considers feedback to inform project design and management of E&S risks; provides stakeholders with timely, relevant and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- Maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.
- Develop Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower must disclose the updated SEP.

- To establish and implement a grievance mechanisms to receive and facilitate resolution of concerns and grievances of project affected parties related to E&S performance of the project in a timely manner.

In this Project, indigenous peoples are expected to be the sole or the overwhelming majority of project affected people. The World Bank's Environmental and Social Framework (ESF) **ESS7: Indigenous Peoples** outlines additional requirements for engagement with IPs throughout the project cycle:

- Ensure that the development process fosters full respect for the human rights, dignity, aspirations, culture and natural resource based livelihoods of IPs
- Avoid adverse impacts of projects on Ips and where avoidance is not possible, to minimise, mitigate and/or compensate for such impacts
- Promote sustainable development benefits and opportunities for Ips
- Improve project design and promote local support through meaningful consultation with IP representative bodies and organisations throughout the project's life cycle.
- Obtain free, prior and informed consent (FPIC) of Ips regarding impacts to land, residences or livelihoods.

3 Stakeholder Identification and Analysis

3.1 Approach to Stakeholder Identification

3.1.1 Stakeholder Categories

For the purpose of 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 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.

3.2 Key Stakeholders Identified

3.2.1 Affected Parties

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

- Local communities in the vicinity of the planned sub-projects
 - Chairperson for each ward
 - Clan leaders, including leadership from identified ethnic and informal settler groups
 - Community groups (Local churches/Youth/ women organisations)
 - Project affected households
 - Market vendors
 - Local schools
 - Local health centres
 - Working age population
- Road users
 - Motorists (including heavy freight transport/commercial and private)
 - Public motor vehicle (PMV) operators
 - Pedestrians
- Government agencies
 - Conservation and Environment Protection Authority (CEPA)

- Climate Change Development Authority (CCDA)
- Department of Transport (DoT)
- Department of National Planning and Monitoring
- Road Traffic Authority (RTA)
- Provincial administration and relevant agencies
- Ward elected councillor
- Utilities and Business
 - PNG Power Limited
 - Water PNG
 - Ramu Nickle
 - Ramu Agri Industries Ltd
- Contractors/subcontractors

3.2.2 Other Interested Parties

Other Interested Parties include individuals/groups/entities that may not experience direct impacts from the Project but who may 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. Other interest parties for the Projects include:

- Development partners (e.g ADB, DFAT, JICA, GGGI)
- Politicians
- Other government agencies (e.g. Department of Health)
- Industry peak bodies
- local NGOs (e.g. Committee of Churches representative, transport/road-safety-related NGOs)
- Media
- General public

3.2.3 Vulnerable Groups

As the Project develops, it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalised or vulnerable status. During the development of the Preliminary ESIA vulnerable stakeholders (if any) will be identified, and engagement activities tailored to their needs. Broad identification of vulnerable stakeholders includes:

- People living outside their customary land/communities (i.e. informal settlers)
- People with disabilities
- Vulnerable road users (i.e. children, elderly, road side market vendors and anyone using the road not in a vehicle)

- Women
- Female-headed households

Vulnerable groups within the communities affected by the Project will be further confirmed during the Project design phase, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the Project is provided in the following sections.

4 STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Stakeholder Engagement Principles

To ensure a best practice approach in stakeholder engagement is delivered, the Project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: Public consultations for the Project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholders' feedback, for analysing and addressing their comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification will be undertaken to support inclusive communications and build effective relationships. Equal access to information will be provided to all stakeholders with all impacted stakeholders to be encouraged at all times to be involved in consultation processes. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods with special attention given to vulnerable groups (people living in poverty, in settlements or outside their traditional communities, remote or inaccessible areas, women, youth, elderly, people with disabilities, those with underlying health issues and culturally diverse ethnic groups).

4.1.1 COVID-19 safe engagement

The PNG Government has taken measures to restrict public gatherings, meetings and movement both within PNG and between PNG and neighbouring countries. The general public is also increasingly concerned about the risks of transmission, particularly through social interactions. Given the highly infectious nature of COVID-19, the Project has developed a COVID-19 Safety Protocol for Project implementation (see Annex 1). This Protocol identifies COVID-19 transmission risks associated with the implementation of the Project; outlines appropriate risk mitigation measures; and assigns roles and responsibilities for their implementation. With the COVID-19 risk situation continuing to evolve, the Project will remain flexible and adapt its strategy to minimise COVID-19 infection risks in line with the National Department of Health's Emergency Response Plan.

4.2 Stakeholder Engagement during Project Preparation

During Project Preparation, stakeholder engagement have been limited to national and subnational representatives due to current COVID-19 associated restrictions.

A **National and provincial consultation workshop** on the Preliminary ESIA and SEP were held 11 February 2022. This consultations were attended by representatives from key government stakeholders including the Department of Transport, Climate Change Development Authority, Water PNG and the World Bank. Follow up engagements continue to be conducted with other key stakeholders including the Road Traffic Authority, Conservation and Environment Protection Authority, Department of National Planning and Monitoring, Provincial Works Departments, Ramu Nickel Mining Limited and Ramu Agri Industries. The objectives of these meetings were to brief and seek feedback from key national and subnational representatives on the components, implementation arrangements and E&S aspects of the RT Project.

Feedback from early consultations is summarised below.

Theme	Comment	Response
Capacity development	<ul style="list-style-type: none"> Project capacity building activities financed by the project should focus on DOWH and other relevant government agencies 	<ul style="list-style-type: none"> Confirmed. An E&S capacity needs assessment and capacity building plan will be developed during early implementation.
Employers Project Manager	<ul style="list-style-type: none"> Is there a clear structure? 	<ul style="list-style-type: none"> Yes. An indicative structure for E&S specialists is outlined in the Preliminary ESIA. Structure will be confirmed during early project implementation.
Technical investigations, ESIA update; detailed design	<ul style="list-style-type: none"> Further E&S assessment is required involving on-ground work and consultation with local actors and communities to confirm potential impacts and mitigation measures (i.e. more markets along Ramu highway now). Technical studies are required to inform detailed design (i.e. Geotech) Contractor should be required to develop CESMP to implement site specific measures. 	<ul style="list-style-type: none"> The preliminary ESIA will be updated alongside field investigations and detailed design work that is planned during early implementation phase of the project.
Climate Risk	<ul style="list-style-type: none"> Recommend a climate risk and vulnerability assessment be conducted for each road to inform design. Suggest DOWH develop a manual for climate resilient roads Offer from Climate Change Development Authority to be involved in climate change work being conducted by DOWH. 	<ul style="list-style-type: none"> Climate resilience is a core part of the project. Climate risk will be assessed during detailed design and finalisation of ESIA. Project will consider a standard Climate Risk and Vulnerability Assessment. DOWH has a draft Climate Policy and continues to engage with the Climate Change Development Authority. Opportunity to do so through this project also noted.
Sanitation	<ul style="list-style-type: none"> Project design to include WASH facilities along the roads is important as this is a critical issue. 	<ul style="list-style-type: none"> WASH facilities will be targeted to specific / in need locations. Design and O&M planning for these facilities will be conducted during detailed design in consultation with key stakeholders/communities.
E&S monitoring	<ul style="list-style-type: none"> Regular E&S monitoring during construction is important. How will this be done? 	<ul style="list-style-type: none"> DOWH will conduct monthly E&S monitoring with support from the EPM. Contractors will also self monitor and report.

The SEP for the Project was disclosed on the DOWH website on in February 2022. The Preliminary ESIA and SEP will be consulted on and disclosed as they are continuously updated throughout the Project implementation period (refer Table 4-1).

Consultations with subnational stakeholders and project affected parties will be conducted during early project implementation when field studies and additional environmental and social assessment work is conducted for each sub-project.

4.3 Stakeholder Engagement during Project Implementation

Two-way mechanisms for ongoing consultation will operate throughout the life of the Project, to disclose information and seek feedback. Dedicated channels for information dissemination will be established to ensure consistent communication at national, provincial and local levels throughout the Project. Engagement objectives will vary across the project phases (refer Table 4-1) and a variety of consultation methods and information dissemination techniques will be used for different stakeholder groups (see **Error! Reference source not found.**).

A Consultation Plan for each sub-project should be developed as part of the Final ESIA and implemented to ensure proactive and ongoing communication with the public and community stakeholders. This Plan should include a Work Plan and Schedule that reflects the overall project schedule and key milestones.

Table 4-1 Stakeholder Engagement – objectives and responsibilities across Project Stages

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
DESIGN	Local Communities and Road Users	<ul style="list-style-type: none"> Outline scope of road works proposed, impacts and mitigation measures Outline GRM and process for providing feedback Identify potential PAPs and vulnerable groups Obtain feedback to inform preliminary design (participatory design) Get feedback on preferred approach and mitigation/restorative measures. 	Meetings Community lead meetings, public consultation meetings & household meetings as necessary	DOWH and EPM
	Vulnerable Groups	<ul style="list-style-type: none"> Outline scope of road works proposed, impacts and mitigation measures Outline GRM and process for providing feedback Obtain feedback to inform preliminary design Get feedback on preferred approach and mitigation/restorative measures. 	Meetings Household and individual meetings	DOWH and EPM
	Key Government Agencies	<ul style="list-style-type: none"> Outline scope of specific road works proposed Comply with national EIA regulations and any international reporting requirements (e.g UNFCCC Nationally Determined Contributions) Planning and preparation of technical documentation 	Official correspondence and reporting, as defined by national legislation	DOWH and EPM
	Utilities and Business	<ul style="list-style-type: none"> Outline specific scope of road works proposed (incl. specific likely impact on businesses and utilities). Obtain feedback to inform preliminary design (participatory design) Reach agreement on preferred approach and mitigation/restorative measures. 	Meetings Emails, in-person meeting/s, teleconference, individual meetings as necessary	DOWH and EPM
	Interested NGOs	<ul style="list-style-type: none"> Outline scope of specific road works proposed (including specific likely impact 	Meetings Public consultation	DOWH and EPM

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
		on community) <ul style="list-style-type: none"> Obtain feedback to inform preliminary design (participatory design) Identify potential PAPs and vulnerable groups. 	meetings	
PRE-CONSTRUCTION	Local Communities, affected people	<ul style="list-style-type: none"> Outline resettlement and land acquisition approach, compensation and implementation process Reach agreement on process for securing land if required, and asset relocation or assistance from works impacts Reconfirm process for providing feedback and lodging grievances 	Meetings Community lead meetings, public consultation meetings & household meetings as necessary Public Notices Community notice board (GRM details)	DOWH and EPM
	Vulnerable Groups			
	Road Users	<ul style="list-style-type: none"> Outline land acquisition implementation process, and how this relates to temporary and permanent changes to the use of the road 	Meetings Community lead meetings, public consultation meetings & household meetings as necessary	DOWH and EPM
	Key Government Agencies	<ul style="list-style-type: none"> Comply with national EIA regulations Discuss process for securing land if required, and asset relocation or assistance from works impacts. 	Official correspondence and reporting, as defined by national legislation	DOWH and EPM
	Utilities and Business	<ul style="list-style-type: none"> Outline land acquisition and implementation process, and how this relates to temporary and permanent changes to the use of the road Reach agreement on process for asset relocation or assistance from works impacts Reach agreement on mitigation/restorative measures for 	Meetings Emails, in-person meeting/s, teleconference, individual meetings as necessary	DOWH and EPM

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
		impacted utility infrastructure, if required		
CONSTRUCTION <ul style="list-style-type: none"> 	All stakeholders	<ul style="list-style-type: none"> Outline scope and design of road works Project status and schedule. Outlining grievance mechanism and provide contact details. 	<p>Meetings Community lead meetings, public consultation meetings & household meetings as necessary</p> <p>Public Notices Community notice board, signs erected at key sites - DOWH website or social media channel, at least 2 weeks prior to the start of any construction works</p>	DOWH, EPM & Works Contractors
	Local Communities - Owners of land and/or assets temporarily acquired during construction	<ul style="list-style-type: none"> Outline construction timelines and impacts for the construction period (including day labour/work opportunities, disruptions, labour camps and community health) Summarise road safety design measures Assessment of land and/or asset prior to disturbance (i.e. benchmark). Acceptance of condition of reinstatement land/or asset after completion of works. 	<p>Meetings Small group meetings & household meetings as necessary</p>	DOWH, EPM & Works Contractors
	Local Communities and Vulnerable Groups	<ul style="list-style-type: none"> Outline construction timelines and impacts for the construction period (including day labour/work opportunities, disruptions, labour camps and community health) 	<p>Meetings Small group meetings & household meetings as necessary</p>	

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
		<ul style="list-style-type: none"> Review traffic and transport safety (e.g pedestrian and vehicle safety, adjusted driving speeds, signalisation of project sites) Alternative vehicular and/or pedestrian routes during works period Grievance redress mechanism for the Project, including who to address complaints/enquires Accessible grievance and complaints forms 		
	Key Government Agencies	Compliance and inspection process covering: <ul style="list-style-type: none"> Implementation of pollution prevention/erosion and sediment control measures OH & S measures Community health and safety 	Official correspondence and reporting, as defined by national legislation	DOWH, EPM & Works Contractors
	Utilities and Business	<ul style="list-style-type: none"> Assessment of utility/business infrastructure prior to disturbance (i.e. benchmark). Acceptance of condition of reinstatement utility infrastructure after completion of works. 	Meetings Emails, in-person meeting/s, teleconference, individual meetings as necessary	DOWH, EPM & Works Contractors
	Contractors and sub-contractors	Review and ensure: <ul style="list-style-type: none"> Stakeholders committee established at each construction location, providing a forum to discuss the works and its effect on the community. Induction training undertaken by all workers on site, concerning relations with local people (including women), health and safety issues, gender-based violence Labour management procedures, including safe and healthy working 	Meetings Training and on-site Toolbox talks on occupational health and safety, traffic safety, gender equity topics Documentation Monthly reporting on progress of works to be submitted during	DOWH, EPM & Works Contractors

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
		conditions are in place (e.g. PPE for all persons on site, license to work or drive specific vehicles, etc) <ul style="list-style-type: none"> Grievance forms/process is understood and accessible for contractor workforce 	construction works	
OPERATION & MAINTENANCE	Local Communities and Road Users	<ul style="list-style-type: none"> Arrangements for continued formal or informal community consultations to identify and address issues or concerns that otherwise may result in operational impediments. 	Meetings Community lead meetings, public consultation meetings & household meetings as necessary	DOWH, EPM & Works Contractors
	Vulnerable Groups	<ul style="list-style-type: none"> Arrangements for continued informal community consultations to identify and address issues or concerns 	Small group and household meetings as necessary	DOWH, EPM & Works Contractors
	Key Government Agencies	<ul style="list-style-type: none"> Comply with national EIA regulations 	Official correspondence and reporting, as defined by national legislation	DOWH, EPM & Works Contractors
	Utilities and Business	<ul style="list-style-type: none"> Review measures to address ongoing physical maintenance requirements Review traffic and transport safety, under new conditions Arrangements for continued formal or informal consultations to identify and address issues or concerns that otherwise may result in operational impediments. 	Meetings Emails, in-person meeting/s, teleconference, individual meetings as necessary	DOWH, EPM & Works Contractors
	Contractors and sub-contractors	Review and ensure: <ul style="list-style-type: none"> Stakeholders committee is established and functioning at each construction 	Documentation Monthly reporting on progress of works to be	DOWH, EPM & Works Contractors

Project Stage	Stakeholder Type	Engagement Objectives	Engagement Method	Lead
		location <ul style="list-style-type: none"> • Grievance forms/process is understood and accessible for contractor workforce 	submitted	

4.3.1 Information Disclosure

4.3.1.1 Project Preparation

The E&S Instruments have been made available by DOWH to key stakeholders to review and provide comment prior to the documents being finalised. Once stakeholder comments are collated, the final E&S Instruments are to be publicly disclosed on the WB website (www.worldbank.org) as well as relevant GoPNG websites.

E&S instruments that will be publicly disclosed include:

- Preliminary Environmental and Social Impact Assessment (P-ESIA)
- Resettlement Framework (RF)
- Stakeholder Engagement Plan (SEP)
- Labour Management Procedures
- Environmental and Social Commitment Plan (ESCP) [remove?]

4.3.1.2 Project Design Documentation – RTP Component 1: Improvement and Sustainable Maintenance of Ramu and Hiratano Highways

All project design documentation, including Environmental and Social Impact Assessments, Resettlement Plans, Environmental and Social Management Plans prepared for road works activities under Component 1 are to be publicly disclosed on the WB website (www.worldbank.org) as well as relevant GoPNG websites.

Stakeholders are to be regularly informed and updated on the Project by way of consultation meetings and public notices (e.g. radio, newspaper etc, as appropriate) including:

- Scope of the works proposed;
- Schedule and progress of works implementation;
- Land access requirements and procedures;
- Entitlements for Project affected persons; and
- Grievance Mechanism process.

Signs and/or notice boards are to also be erected at the works site, which should provide the following information:

- Name, address and other contact information for the DOWH PIU Director, and Contractor;
- Contact points for the Grievance Mechanism;
- Project information (objectives, technical information, development schedules etc);
- Information of venue (village) and date where a consultation meeting will take place; and
- Maps showing location of Project infrastructure in relation to villages.

4.3.2 Stakeholder Engagement Tools and Materials

Stakeholder engagement tools and community relations measures that will be used in conjunction with this SEP include:

- **Project Summary Documents** – For each key stage of the Project, a Project summary document will be prepared or coordinated by the PIU to inform stakeholders of the stage of the Project and the purpose of upcoming consultation(s). Project summary documentation will be made publicly available on the DOWH website and/or associated social media channels.
- **Consultation Materials** – Prior to consultation meetings, agendas will be circulated to key stakeholders and visual presentations should be prepared, where feasible. Project summary documents will be used to support these materials.
- **Language:** Engagement is to be undertaken in a language appropriate for various stakeholder groups. While English is an official language of PNG, Tok Pisin is the most widely spoken, and will likely be better understood amongst community stakeholders. Literacy levels amongst stakeholders should also be considered when undertaking engagement.
- **Engagement/Meeting Notes** – To ensure that an accurate and detailed record of information and views are gathered at every stakeholder meeting consultation meeting notes will be prepared after key stakeholder meetings throughout the Project. Photographs and attendee lists will be attached to the meeting notes.
- **Grievance Mechanism** (refer Section 5) – Provides a mechanism for communities and affected or aggrieved parties to raise complaints and grievances and allows the Project to respond to grievances in an appropriate manner. A complaints/grievance register will be developed to record all grievances reported.

4.3.3 Strategy for engaging Indigenous Peoples

PNG is one of the most culturally diverse countries in the world with over 800 languages and over 1,000 distinct ethnic group. Indigenous peoples are expected to be the sole or the overwhelming majority of project affected people. Ethnic groups identified in the project areas of influence are outlined in the Preliminary ESIA.

Despite this cultural diversity, common elements exist between groups and navigating differences in language, culture and custom is part of everyday life in PNG and national programs are adept at dealing with this. The Project will ensure that stakeholder engagement and information disclosure activities are designed and implemented using culturally appropriate approaches that recognises both this diversity and common traditions.

Strategies will include:

- Conducting rapid assessments in the project area of influence in Madang, Morobe and Central Province communities to identify:
 - cultural groups (both traditional communities and settlers)
 - decision-making structures and traditional communication channels and inform the design of nuanced community level communication and engagement approaches
 - broader issues relating to ethnic or cultural relationships, including any legacy of conflict between or among social groups.
- Utilising the strengths of shared language (i.e. Tok Pisin or Motu) and shared religion/beliefs (i.e. Christianity/animism) to guide broader communication and engagement approaches.

More broadly, consultations with diverse ethnic groups will ensure the following engagement principles are employed:

- Consultations are conducted in a way that allows people to speak freely and openly regarding their views and concerns relating to the project and its implications for them;
- Consultation results are summarised, with formulation of responses to major issues raised. If it is determined that no further action is required to address concerns or complaints, the justification for that finding is briefly explained. If it is decided that further action or special measures should be provided, the summary describes actions and measures, how they are to be incorporated into project design, and how they will be implemented and financed.

5 GRIEVANCE MECHANISM

A project grievance mechanism will be established for the Project. A summary of this mechanism, including objectives, procedures as well as recording keeping, reporting and evaluation requirements are summarised below.

5.1 Objectives

The purpose of the grievance redress mechanism (GRM) is to receive, assess, and facilitate resolution of project related concerns and grievances, at no cost and without retribution. The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive.

The mechanism is also used to improve the social performance of the Project. In particular, it will take into account the traditional mechanisms of Indigenous Peoples for raising and resolving issues.

The GRM aims to:

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

Participation in the grievance process does not negate an individual's right to pursue other remedies as provided under Papua New Guinean law.

The Project's GRM will also outline a process for handling cases of SEA/SH. A GBV response protocol is provided in the RTP SEA/SH Action Plan. This protocol will ensure a survivor-centric approach to the management of grievances, including a focus on referring survivors to GBV services.

5.2 Grievance Redress Procedure

The GRM for RTP is designed in accordance with the risks and adverse impacts anticipated for the Project. If addressed in a timely manner, using an understandable and transparent process, the concerns and complaints of potentially affected people will usually be resolved.

The GRM for the Project will follow a tiered approach, where issues and complaints are initially managed at the local level. Grievances that are complicated or cannot be 'resolved' are escalated. The key stages of the process for the Project are outlined in **Error! Reference source not found.** and summarised below. This approach is consistent with other GRM procedures implemented in PNG under WB funded projects.

This GRM will be further refined and operationalised during project implementation.

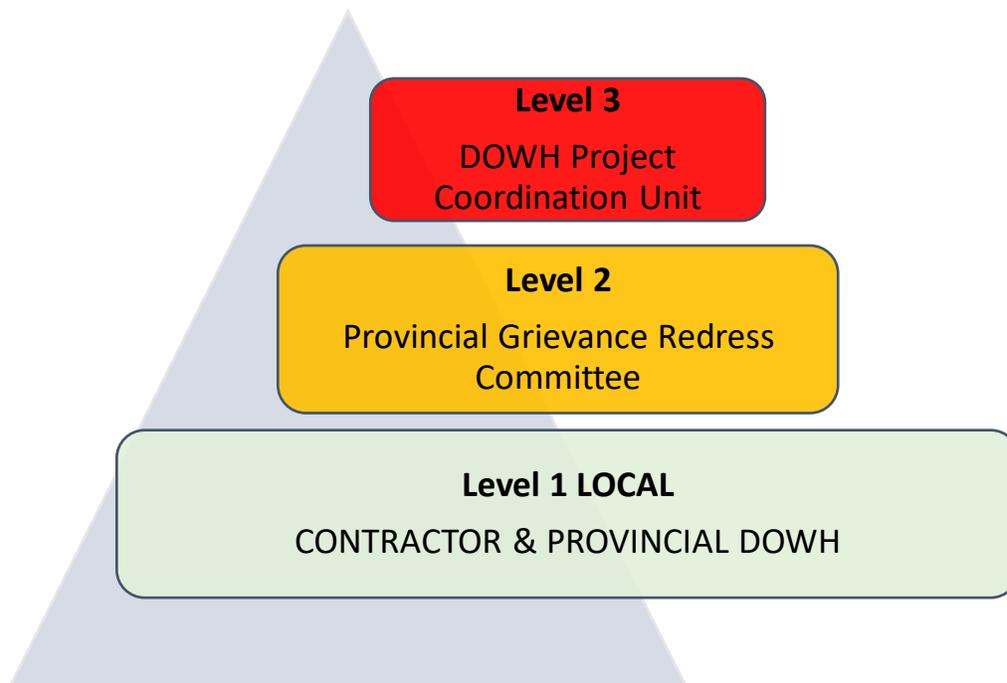


Figure 5-1 Project GRM process

The project GRM process (Figure 5-1) operates through the following levels:

- Level 1:** At the local level, complaints will be managed by the contractor and/or provincial DOWH. Upon receipt, the delegated contractor/superintendent/community liaison role under the contract will formally **acknowledge**¹ receipt of the grievance and ensure the complaint is appropriately assessed, documented and registered using a Grievance Claim form/complaints register. All grievances outside the jurisdiction of the Contractor shall be filed at the Office of the Provincial Works Manager (PWM). The delegate will ensure that the grievance is investigated and a proposed resolution is provided within 15 days of receipt. If the complaint is not **resolved**² within the allocated time, the complaint will be referred to Level 2. Any serious or sensitive grievances³ will be elevated to the Project Director immediately.
- Level 2: Provincial Grievances Redress Committee (P/GRC)**– Grievances that cannot be resolved at level 1 will be referred to the P/GRC. The P/GRC will include the Provincial Works Manager (Chair), Provincial Administrator/or representative (Co-Chair), Provincial Department of Lands representative, Provincial Department of Environment representative, Village Chief and Civil Society Representative. The P/GRC will ensure that the grievance is investigated and a proposed resolution is provided within 15 days of receipt. If the complaint is not **resolved**⁴ within the allocated time, the complaint will be referred to Level 3.
- Level 3:** Complaints will be handled centrally by the DOWH PIU. DOWH will formally acknowledge receipt of the grievance and ensure that the complaint has been assessed, documented and

¹ Acknowledged - the complaint is formally acknowledged and registered.

² Resolved - complainant accepts proposed resolution and grievances is closed.

³ Complaints relating to SEA/SH issues or other issues that have caused or may cause significant harm to people or the environment; or where complainants feel that the relevant institutions cannot assist in the resolution of grievances because they include an individual or individuals who have themselves abused the process.

⁴ Resolved - complainant accepts proposed resolution and grievances is closed.

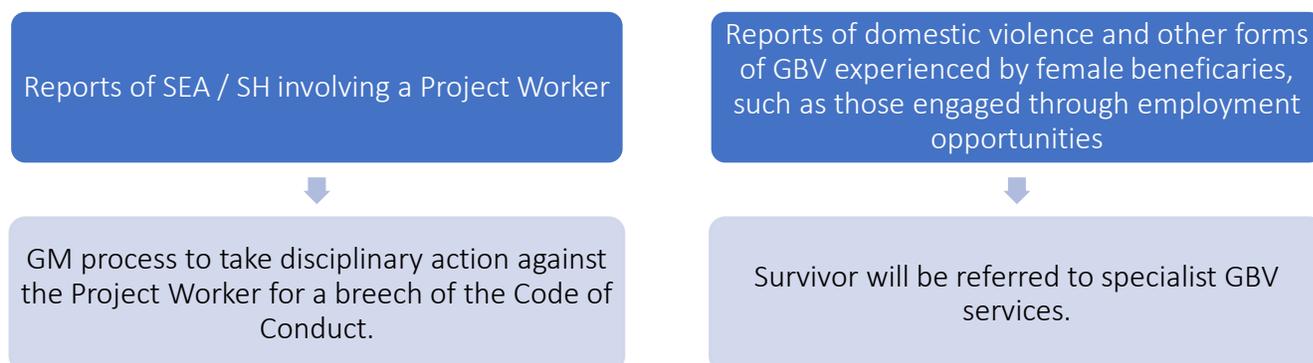
registered, using the project's GRM form. This includes i) classifying the grievance based on the type of complaint and ii) providing the initial **response**⁵ as quickly as possible. DOWH will ensure that the grievance is investigated and a proposed resolution is provided within 15 days, from when the grievance is registered. If the complaint is not able to be resolved within the allocated time, it will be referred to Level 3.

- **Level 4:** If the aggrieved person is still dissatisfied, the case may be referred to legal proceedings in accordance with national laws and procedures. This will be at the aggrieved person's cost unless otherwise determined by the PNG legal court decision. Specific provisions dealing with grievances and complaints concerning customary land are outlined in the project's Resettlement Framework.

5.2.1 Gender Based Violence

The project Grievance Mechanism will be updated during early project implementation to include details of how reports of GBV, including Sexual Exploitation and Abuse / Sexual Harassment, will be received, resolved, and documented.

As per the project's GBV-SEA/SH Action Plan (refer ESIA, Annex B) the following elements will be integrated into the GM to respond to cases of GBV, including SEA / SH:



The process to receive and respond to complaints of GBV, including SEA / SH, will apply a survivor-centered approach to ensure that the rights of the survivor are upheld.

Anyone receiving or handling complaints of GBV must receive training so that they do not revictimize and retraumatize survivors or unintentionally cause them harm.

5.2.2 Modes of receiving grievances

Complainants can submit grievances either orally or in writing. A variety of channels will be established including community representatives (i.e. Village Chief or Ward Councillor), on-ground contractor/DOWH staff, suggestion/complaint box, telephone, SMS, or email. Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known.

Language barriers and insufficient literacy levels shall also not prevent any persons from lodging a complaint.

⁵ Response - steps are taken to investigate and a proposed resolution is presented to the complainant.

5.3 Awareness/Disclosure of Grievance Redress Mechanism

The Project GRM will be publicly available on the DOWH website and in affected communities.

In the early stages of engagement, project stakeholders and affected communities must be made aware: (i) of how they can access the GRM; (ii) who to lodge a formal complaint to; (iii) timeframes for response; (iv) that the process must be confidential, responsive and transparent; and (v) alternative avenues where conflicts of interest occur.

All stakeholders, including local authorities and community members in the vicinity of the identified works, will need to be informed of the Project's GRM process. Disclosure methods will include community flyers, community and project notice boards, translated to Tok Pisin. Disclosure will be required for the duration of the Project, including construction and non-construction components, and prior to the commencement of any civil works.

The GRM process is to be introduced during all stakeholder engagement activities and publicly disclosed on relevant websites, to ensure that all relevant stakeholders are aware of this procedure and the specific steps to be taken for lodging a complaint (refer *Section 4.3.1 Information Dissemination*).

5.4 Monitoring, Tracking and Reporting

5.4.1 Grievance Record Keeping

All complaints or grievances submitted will require the completion of a Grievance Claim Form. Matters relating to construction activities will be addressed by contractors while land/ compensation issues will be addressed through the DOWH PIU.

The Grievance Claim Form shall be written in English and Tok Pisin and disclosed during consultation. Forms will be completed by the Contractor, Provincial DOWH or DOWH PIU and reviewed by the complainant. Grievances forms can also be submitted electronically through the DOWH website or email. Personal details can remain anonymous.

Complaints or grievances are to be recorded in a Grievances Registry held by the DOWH PIU. The register is to clearly indicate whether an issue has been resolved or is still outstanding. The following records generated by this procedure will be stored in hard copy by the DOWH PIU and in electronic format:

- Grievance Claim Forms;
- Letters of request;
- Memorandums of field investigations, consultations and meetings; and
- Photographs, maps, drawings.

If an issue has been resolved, the register will include the following information:

- Completed Grievance Resolution Form;
- Action taken (including evidence of action taken, i.e. photographs, receipts, etc.);
- Date of resolution; and
- Signature of complainant and person responsible for issue resolution.

5.4.2 Reporting

Monthly/quarterly reports prepared by DOWH will provide summaries of complaints, types, actions taken and progress made in terms of resolving pending issues, and drawing on information from DOWHs GRM register and information from Contractor / Provincial DOWH reports.

Reports on the GRM will inform the ongoing revision of the SEP and help to identify the need for change in Project focus, strategies and implementation.

6 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING SEP

6.1 Stakeholder Engagement Resources and Responsibilities

The DOWH will be responsible for implementing the SEP under the Project. Resources and responsibilities across various roles are summarised below.

6.2 Department of Works

A **Project Implementation Unit (PIU)** will be established within DOWH for the Project. The PIU is responsible for overall implementation, project planning and coordination, procurement, monitoring of the project activities and reporting on the Project.

The **Project Director** will provide oversight and support coordination of project implementation. The PIU will be comprised of **Environmental & Social Officers**, dedicated to the Project. The PIU will also be supported by DOWH's Environmental and Social Safeguards Branch (ESSB). Stakeholder engagement will be the responsibility of all members of the PIU.

At the Provincial level, the PIU will engage a Provincial works engineer and Provincial works community liaison officer, for each sub-project to lead on-ground stakeholder engagement with affected communities.

6.3 Employers Project Manager

DOWH will retain the support of an Employers Project Manager (EPM) with an **Environmental Specialist Social Specialist and Occupational Health and Safety Specialist** to assist in preparation of E&S instruments – including the SEP, and their implementation during project implementation. The Supervising Engineer will also appoint a **GBV specialist** who will support the implementation of their Action Plan and ensure adherence to World Bank SEA / SH risk mitigation and response strategies.

The ESS will also be responsible for supporting technical skills development within the PIU.

6.4 Civil Works Contractors

Civil Works Contractors will be responsible for undertaking stakeholder engagement related to site preparation and construction of the specific physical works. The scope of stakeholder engagement will be documented in the C-ESMP Community Engagement Plan. The Plan shall:

- Identify and prioritise key stakeholder groups;
- Provide a strategy, activities and timetable for sharing information and consulting with each of these groups;
- Describe resources and responsibilities for implementing stakeholder engagement activities;
- Describe how stakeholder engagement activities will be incorporated into the company's management system
- Outline activities and timetable for establishing and implementing the contractor led aspects of the project grievance redress mechanism
- Outline a community consultation and information dissemination program and provide a schedule of planned meetings for the first six months of the program
- Outline the objectives of the stakeholder committee and its terms of reference.

Social interaction, gender awareness and social awareness and employment requirements will also be incorporated into the Community Engagement Plan. A Stakeholders Committee is to be formed at each construction location to provide an open forum to discuss the works and its effect on the community (refer Table 4.2). To ensure local benefits are retained, the Contractor should employ local people, including 20% women, where possible. The contractor should also consider the use of local community and women's groups for Sub-contracts whenever possible on the works.

7 MONITORING AND REPORTING

The SEP will be periodically revised and updated as necessary in the course of Project implementation. This will be undertaken in order to ensure the following:

- information is consistent and is reflective of evolving information requirements at different stages of the Project
- methods of engagement remain appropriate and effective for the Project.

Any major changes to Project-related activities or schedule will be reflected in the SEP.

Project stakeholder engagement activities will be documented through quarterly and annual progress reports, to be shared with the World Bank. Quarterly 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 the DOWH **Environmental and Social Officers**. The quarterly 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.

Information on public engagement activities undertaken by the Project during the year will be included in the annual report of the DOWH to Parliament. The project will include a key performance indicator "Project related complaints to the Grievance Redress Mechanism (GRM) satisfactorily addressed within the specified timeframe" to monitor the implementation of the Project GRM.

8 ANNEXURES

Annex 1 COVID-19 Safety Protocol: Project Implementation

Purpose

The purpose of this Protocol is to identify COVID-19 transmission risks associated with the implementation of the Resilient Transport Project; outline appropriate risk mitigation measures; and assign roles and responsibilities for their implementation.

Context

An outbreak of the coronavirus disease (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has spread rapidly across the world since December 2019. On 11 March 2020, the World Health Organization (WHO) declared a global pandemic.

The first COVID case in PNG was recorded in March 2020. The GoPNG activated the National Emergency Response Operation Committees (NEOCs) on the 27th of January 2020. COVID-19 was declared a national emergency on March 11, 2020. A Joint Agency Task Force for COVID 19 under the National Control Centre has been established to coordinate the national response. The official website is:

<https://covid19.info.gov.pg/>.

NDoH in partnership with the World Health Organisation published the Niupela Pasin Transitioning to a 'New Normal' Handbook. The Government of Papua New Guinea (PNG) through the National Department of Health (NDOH) has also developed a preparedness and response plan that outlines the strategic components for managing a public health response to COVID-19.

COVID-19 Transmission Risks

The RTP will be implemented through the Department of Works and Highways (DOWH) as the single Implementation Agency (IA). The Project will engage project workers including government staff (central and provincial), contractors, sub-contractors and consultants, to improve the quality of the road network in Madang, Morobe and Central Provinces.

The project's design includes:

- Rehabilitation, reconstruction and maintenance of existing highways
- Road safety strengthening activities, including improved quality and safety of pedestrians' facilities and relocation of market vendor stalls
- Conduct of community engagement activities associated with traffic safety and awareness
- Technical assistance provided by in-country and international consultants (located in the DOWH PIU).

These engagements present a moderate-high risk of COVID-19 transmission i) between project workers, ii) from project workers to target beneficiaries, and iii) amongst targeted beneficiaries. The risk of transfer between outside project workers (contractors and sub-contractors) to communities is viewed as the greatest risk.

COVID-19 Transmission Mitigation Measures

The Project will implement the following measures to mitigate the risk of virus transmission during project implementation:

- Routinely review the national, provincial and district COVID-19 situation and the restrictions put in place by the government to contain virus spread and send updates to DOWH on a regular basis or sooner if the situation has changed;
- Ensure that all project workers including government, contractors, sub-contractors and consultants undertake regular COVID-19 risk awareness and mitigation training and commit, through the project's code of conduct, to managing COVID-19 risks associated with project activities;
- Ensure project beneficiaries are made aware of COVID-19 transmission risks and prevention measures (general and project-specific) throughout project implementation by utilizing project communication channels including website, Facebook page, community notice boards; and before the commencement of on-ground project consultations/activities;
- Conduct all project activities as per the national restrictions or advisories including staying home when sick, good hygiene and social distancing, and minimize direct interaction between project workers and beneficiaries / affected people where possible;
- Ensure that project workers do not conduct face-to-face activities when they are feeling unwell or have been identified as a close contact of a COVID-19 case. Support Government, PIU staff and consultants to get tested for COVID-19 before recommencing face-to-face activities. In the event that a case is identified by medical experts, the PIU must be notified immediately and will work closely with medical staff and authorities to ensure support is given to the officer/consultant to go through the necessary protocols including isolation and treatment.
- Monitor and report on the implementation of project COVID-19 prevention measures during the conduct of project activities through the project's existing monitoring and reporting framework.

Roles and responsibilities

The DOWH Director will have overall responsibility for ensuring the implementation of the Plan. Day to day implementation will be conducted led by the EPM Manager and project E&S officers/specialists.

All Project workers and external contractors engaged by the project including government staff, project staff, contractors and consultants are required to carry out their duties in accordance with this Plan.

Resources

GoPNG COVID19 situation reports and advisory: <https://www.health.gov.pg/subindex.php?news=1>

GoPNG COVID19 awareness-raising resources: <https://covid19.info.gov.pg/index.php/covid-19-awareness/>

Tools

The following tools will be developed/utilized by project management staff to ensure COVID-19 mitigation measures are complied with:

- RT Project Pre-Mission Checklist / Project Worker Health Certification
- RT Project Training Record
- RT Project COVID Safe Meeting Guidance

- RT Project Consultation Record (to be updated with COVID 19 awareness and COVID 19 safe meeting check box) and attendance/participant health certification.