**Pakistan
SINDH FLOOD HOUSING EMERGENCY
RECONSTRUCTION PROJECT
(SFHERP)**

PRELIMINARY
STAKEHOLDER ENGAGEMENT PLAN (SEP)

NOVEMBER 3, 2022
GOVERNMENT OF SINDH, ISLAMIC REPUBLIC OF PAKISTAN

Pakistan: Sindh Flood Housing Emergency Reconstruction Project (P180008)
Preliminary Stakeholder Engagement Plan

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I-   Introduction

Pakistan is vulnerable to flooding, including riverine, flash, glacial lake outbursts, and coastal flooding, with the country regularly experiencing large-scale flooding, most notably in 2010 and the ongoing 2022 crisis. Pakistan faces some of the highest disaster risk levels in the world, ranking 18 out of 191 countries according to the 2020 Inform Risk Index. While this ranking includes the country's exposure to earthquakes and internal conflict, Pakistan is at a particularly high risk of flooding, at 8th in the world. Floods remain the dominant hazard in Pakistan, despite a history of other disasters such as earthquakes, heatwaves, and droughts. The majority of the country's population lives along the Indus River, an area prone to severe flooding, especially during the monsoon season. The catastrophic 2010 rains flooded one-fifth of the country, affecting 20 million people and claiming 2000 lives. It is estimated that Pakistan's average annual losses to flooding are above US$ 1 billion[5]. These figures are set to rise due to development, climate change, and the unprecedented losses experienced during the 2022 floods, exceeding the scale of the 2010 monsoon flooding. Prior to this, 2010 represented the worst flooding in the country's history. Pakistan's climate vulnerability, coupled with the uncertainty surrounding annual glacial melt, average precipitation, and extreme temperature changes, highlights the need for ex-ante disaster preparedness and resilience building.

The province of Sindh is particularly vulnerable to natural disaster events due to its geographical location, socioeconomic vulnerability, and climatic conditions. These include drought, heatwaves, floods, cyclones, windstorms, tsunamis, sea intrusion, and earthquakes. While most of Pakistan experiences high temperatures in summer, Sindh is highly exposed to the impacts of high heat. In some areas, summer temperatures can exceed 50 degrees Celsius, threatening human health, productivity, and food security. Densely populated areas such as Karachi are also at a high risk of the impacts of extreme heat. The deaths from the 2015 heatwave were concentrated in the Sindh province. The impact of droughts in the province is also severe – in January 2019, 3 million people in Sindh were impacted by moderate to severe drought due to a sharp drop in annual rainfall. Parts of Sindh are also highly vulnerable to human, infrastructure, and other asset losses from floods. Sindh's geography and topography further exacerbate its vulnerability to disasters. Agricultural land in the low-lying areas of Sindh, downstream of the Indus, is also highly exposed to flooding, threatening food security in the province and across the country. Sindh is also home to a large fraction of the coastal areas of Pakistan, which are at a significant risk from a projected rise in sea-level, which may go up to 40cm by the end of the 21st century even under conservative scenarios. The vulnerability of Sindh to climate change is further intensified due to the prevalence of high poverty rates, as much as 40-60 percent in some districts. These areas also face inadequate health services, water and sanitation, schooling, and access to electricity. Multidimensional poverty in addition to a high population and rapid urbanization makes Sindh more vulnerable to hazards when they strike.

Sindh has been disproportionately affected by the 2022 floods. The province alone is estimated to have received rainfall in excess of 400% over the 30-year average. Between June 14 and September 15, 2022, 747 of the 1,638 nationwide casualties were in Sindh, including 319 children, with 8,422 people injured. Over 1.8 million houses in Sindh were damaged or destroyed, nearly 89 percent of the nationwide total. Reports estimate that more than 3.9 million hectares of agricultural land has been destroyed in Sindh alone, giving rise to fears of impending food shortages. To date, several areas in Sindh remain inundated with floodwater accumulating from other parts of the country following glacial melt in the mountainous north and record monsoon rains nationwide. Meanwhile, stagnant water in several districts is giving rise to skin, gastric, and mosquito borne diseases. Dewatering inundated areas is expected to take several weeks, exacerbating these risks. Emergency rehabilitation is essential to facilitate communities in

recovering from the 2022 floods.

To respond to the unprecedented flooding disaster, the Bank is mobilizing almost US$ 2 billion in financing under three pillars – Response; Reconstruction and rehabilitation; and Resilience. In parallel to SFHERP, the Bank is also preparing another emergency project titled Sindh Floods Emergency Rehabilitation Project (P179981) focusing on floods reconstruction focusing on irrigation, livelihoods, water supply, roads and emergency services, which is expected to be approved by the Bank's Board in December 2022.

II-   Project Description

The project development objective is to support the Government of Sindh in delivery of beneficiary-driven and multi-hazard resilient reconstruction of housing units post-2022 floods. This project aims to support beneficiary-driven reconstruction of damaged houses from 2022 floods. The project components are briefly described below.

Component 1 – Housing Reconstruction Grants

This component will support the provision of cash grants to homeowners for reconstruction or restoration of damaged houses. The grant would finance: (a) A core unit of fixed covered area built to prescribed multi-hazard resilient standards (b) A basic rainwater harvesting system and twin pit latrine to improve WASH access. The rebuilding would be beneficiary-driven - a mode well suited to the mainly rural affectees. The grants would be released directly to the beneficiary's bank[1] account in tranches, linked to stages of construction and adoption of multi-hazard resilient standards. The POs will be responsible for providing social controls to ensure accessible and transparent release of cash grants to the beneficiaries from banking channels. In this scheme, households will be able to utilize their own labor, hire trained craftsmen, and receive technical assistance from reputable local Partner Organizations (Non-governmental Organizations (NGOs)/Micro-finance Institutions (MFIs)) to reconstruct or restore their houses.

Component 2 – Institutional Strengthening and Technical Assistance

1.   **Subcomponent 2.1: Damage & Eligibility Assessment Survey.** The survey will be conducted to: (a) categorize the level of damage to each housing unit through an engineering assessment via standardized checklist; (b) establish status of land ownership; (c) classify level of hazard risk of the site; and (d) establish lists of eligible beneficiaries and vulnerable individuals/households that are unable to prove their identity/property ownership, including households with disabled persons and households headed by women with high dependency ratios.

2.   Survey teams will be gender-balanced and trained to collect data from vulnerable individuals and households and connect them to different forms of legal and construction support being provided under the proposed Project. The sub-component will cover the costs of administering the survey in the affected districts, as well as training the survey teams in assessment techniques and criteria so that these are applied uniformly. Based on World Bank Group Commitment-3 on Disability-Inclusive Development[2], disability desegregated data will be collected during damage assessment.

Subcomponent 2.2: Technical Assistance for Reconstruction Program. This subcomponent will

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[1] Both mobile and branch banking options will be made available depending on beneficiary preference and ease of access.

[2] https://www.worldbank.org/en/topic/socialsustainability/brief/world-bank-group-commitments-on-disability-inclusion-development

provide technical assistance for the housing reconstruction program of the Government of Sindh. This will include support for: (i) Formulation of Housing Reconstruction Strategy – to provide the policy framework for the overall housing reconstruction program of Government of Sindh including eligibility criteria, compensation policies and technical standards. These will be included as part of the Program Guidelines document.; (ii) Developing Multi-Hazard Resilient Housing Solutions which are efficient, economical, and suited to local norms and locally available materials. These solutions will be standardized across the reconstruction program to ensure transparency and efficiency. The design options will be identified on the basis of technical feasibility and in consultation with key stakeholders including academia, civil society and community organizations with relevant expertise; (iii) Skills Training Program for Communities and Artisans including resilient construction practices for artisans and orientation of beneficiaries on eligibility criteria for program participation. Specialized training programs will also be introduced to train masons in responding to the needs of persons with disabilities, as well as to benefit persons with disabilities beyond the life of the project. Given the upstream nature of the activities proposed under this sub-component, the Housing Reconstruction Company has already mobilized resources for execution and the associated costs will be considered for retroactive financing under the project.

Subcomponent 2.3: Implementation Support through Implementation Partners (IP).
In view of the extensive outreach needed for the credible administration and monitoring of the housing reconstruction, existing public sector institutional capacity will require considerable reinforcement. However, building capacity requires a longer timeline, while the housing reconstruction activity cannot be delayed. This component will assist in enhancing the public sector's delivery capacity through POs consisting of Non-governmental Organizations (NGOs) with strong existing outreach at community level and proven track records of delivering disaster reconstruction programs.

Component 3 – Project Management and Implementation Support

This component will support the management and implementation of the project, including the establishment and operationalization of an empowered implementation agency by the Government of Sindh. It will also support setting up a robust, digital M&E system to oversee implementation progress, ensure periodic reporting, and assist in course corrections based on implementation experience. Moreover, it will support: (i) incremental operating costs including recruitment of incremental operating staff and individual consultants as required; (ii) consultancy firm costs; and (iii) expenditures on fiduciary systems, environmental and social management requirements, Communications, and setting up of a Grievance Mechanism (GM).

III-   Discussions with Government Agencies

A summary of discussions held with government officials relevant to the implementation of the proposed project is given below.

The designated focal points (FPs) for environmental and social (E&S) management of the proposed project. Discussions were held with the E&S FPs of the proposed project and future course of action was charted out for various activities to be carried out during project preparation and implementation, most notably, stakeholder consultations and government approvals for the proposed project. A field visit was also arranged with these FPs to see the flood affected areas first hand and also to interact with the flood affectees.

The Director General, Sindh Environmental Protection Agency. A meeting was held with the Director General (DG), Sindh Environmental Protection Agency (SEPA). The project key features were explained to

him and also the potential environmental and social impacts of the project as well as the opportunities for environmental enhancement and social development that can be materialized through the implementation of the project. The DG enquired about the sewage treatment and solid waste disposal arrangements associated with the houses to be reconstructed or repaired.   He emphasized that appropriate arrangements should be made for the appropriate disposal and treatment/management of wastes from the houses. It was explained to him that designs to be made by the project will include provision of pit latrines thus discouraging the practice of open deification which is widely used in the poor rural communities. It was further explained that the usage of alternate construction materials such as compressed stabilized earth material bricks instead of burnt bricks need to be considered reducing the need of fuel wood or coal that is currently used in making the burnt bricks in the brick kilns. He suggested that the awareness to the communities should be provided about this new brick technology. He assured that if the project needed any approvals from the EPA, he would expedite the approval process to facilitate the project.

The Director General, Climate Change. A meeting was held with the DG, Climate Change. He emphasized the need to learn lessons from the previous experiences and to adopt the 'build back better' approach thus avoiding similar damages in future. Through the help of flood and rainfall data, he explained the extent of excessive rainfall the country particularly Sindh province experienced causing severe flooding in most parts of the province. He also compared the recent flood with the ones that occurred in 2010 and 2011 and explained that the data analysis reveals an increasing trend in the extreme events like heat waves and torrential rains in the area. He stressed the need of a combination of adaptive and mitigatory approaches to address the disasters such as the 2022 floods.

The Secretary, Forest and Wildlife Department. A meeting was held with the Secretary, Forest and Wildlife Department. The key features of the proposed project were explained to him and his views sought on the reconstruction of damaged/destroyed houses inside the officially designated protected areas such as national parks and wildlife sanctuaries. He was of the view that the reconstruction should not be allowed inside such areas. However, he also recognized that the earlier attempts to enforce such restrictions have not been successful. He also recognized that a huge quantity of fuel wood would be needed in the brick kilns if the affected people opted to use burnt bricks for the house reconstruction/repairs.

The Secretary, Implementation and Coordination Department (I&C). A meeting was held with the Secretary, I&C. He has been nominated as the Project Director of the proposed project. He was of the view that the project has limited E&S issues. Furthermore, he mentioned that the project is not likely to be implemented in areas affected or to be affected by Anti Encroachment Drive (AED). The Bank's team emphasized that the proposed project would need to be implemented outside any AED-affected areas, a confirmation letter should be sent by the Local Authorities to the Bank. Another aspect discussed with him was the possible land title to be provided to the house owners without the land title. This aspect needs careful consideration and extensive consultations will need to be carried out with full range of stakeholders during the project implementation before any practical step can be taken in this regard.

Assistant Commissioner (AC), Sehwan

The AC Sehwan joined the field team during field visit and briefed about the flood impacts in the area. He explained that many villages in Sehwan and surrounding areas were inundated due to flood water coming from Manchar Lake. The water has now started receding in the area and it will take several more weeks to completely recede, then the rehabilitation work will start. The government is currently busy in relief operations.

IV-   Rationale and Objective of the Stakeholder Engagement Plan (SEP)

In compliance with the WB Environmental and Social Standard 10 (ESS10), this SEP seeks to achieve open and transparent engagement between the GoS and project stakeholders as an essential element of good international practice, thus ensuring E&S sustainability and wider acceptance of the project.

The overall objective of this SEP is to define a plan of action for stakeholder engagement, including technically and culturally appropriate approach to public consultation and information disclosure, throughout the entire project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities.

The involvement of different stakeholders, including the local population and flood affectees is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities.

This is a Preliminary SEP, which would be updated when the project becomes effective. Detailed consultations could not be held due to emergency situation and multiple stakeholders' preoccupation with the flood response. This SEP will be reassessed, consulted and updated within 60 days of project effectiveness.

The SEP will, eventually:

- Establish a systematic approach to stakeholder engagement that will help Government of Sindh (GoS) and its various departments to identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties and vulnerable and disadvantaged groups.

- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance. Also, to ascertain how each category of stakeholders would like to be engaged.

- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.

- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.

- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

V-   Stakeholder Identification and Analysis

Stakeholder analysis identifies and determines the likely relationship between the project and the different stakeholders. Stakeholders are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. It is a useful tool for managing communication between the project team and stakeholders. Project stakeholders are defined as individuals, groups, or other entities who:

- Are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as 'affected parties'); and,

- 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.

In all phases of the project, cooperation and negotiation with stakeholders is required. Persons within the groups who act as legitimate representatives of their respective stakeholder group and entrusted by their fellow group members will be identified in the process of engagement. Community representatives may provide helpful insight into the local settings and act as main means for dissemination of the Project information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

A- Methodology

Stakeholder analysis helps to know the perceptions, interests, need, and influence of actors on the project. Identifying the appropriate consultation methodology for each stakeholder throughout the project lifecycle is necessary. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation;

- **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making;

- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communications and building effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, particularly women headed households, youth, elderly and the cultural sensitivities of diverse ethnic groups.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

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

2. 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

3. Disadvantaged/Vulnerable Individuals or 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,5 and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project

B- Affected Parties (APs)

Affected Parties are those groups of people that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to potential risks and impacts associated with the project and who need to be closely engaged including local community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

Table 1: Affected Parties

Sector	Affected Parties
Government	• The Planning and Development Department • Housing and Town Planning Department • Sindh Environmental Protection Agency • Board of Revenue • Forest and Wildlife Department
Community	• Community members with destroyed or damaged houses • Community workers • Other community members who have not lost their houses but otherwise impacted by the floods (eg, farmers who have lost their crops) • Village committees • Village elders • Community based organizations.
Private Sector	• Suppliers of construction material

C- Other Interested Parties (OIPs)

Other parties interested in the Project are identified as individuals, groups, or organizations who may not be directly affected by the Project but who can help play a role in identifying potential risks, impacts, and opportunities for the Borrower to consider and address in the assessment process and throughout project preparation. The following Other Interested Parties (OIPs) have been identified as stakeholders of the Project:

Table 2: Other Interested Parties

Sector	Other Interested Parties (OIPs)
Community	• Public at large
Others	• Local NGOs involved in mobilization and preparation of communities' readiness for implementation. • Universities and research institutions, eg. NED University of Engineering and Technology • Other Local NGOs.

Sector	Other Interested Parties (OIPs)
	• Contracted workers, consultants, others.

D- Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged or vulnerable individuals or groups are those peoples or groups highly vulnerable to potential project impacts and often do not have a voice to express their concerns or understand the impact and risk of the project. They may disproportionately be impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and usually require special arrangement to ensure their equal representation in the consultation and decision-making process associated with the project. Their vulnerability may stem from person's origin, gender, age, health condition, disability, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. ethnic and religious minority groups, Indigenous peoples), and dependence on other individuals or natural resources.

Awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on the project must consider such groups or individuals' sensitivities, concerns and cultural differences to ensure a full understanding of project activities and benefits. Engagement with these 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 proposed Project, the vulnerable or disadvantaged groups may include, but not limited to, the following:

Table 3: Disadvantaged/Vulnerable Individuals or Groups

Sector	Disadvantaged/Vulnerable Individuals or Groups
Community	• Ethnic/religious/gender minorities (such as members of Hindu community) • Affected households – reliant on cropping activities and already facing food insecurity • Elderly people in hard-hit areas • Female headed households • Children and youth heads of households • Agriculture labor dependent on sharecropping (*Haarees)* • Communities practicing subsistence farming • People with disabilities. • People with special needs such as Pregnant women, children, those in poor health (i.e. with respiratory illnesses) • Poor people, including ex-pastoralists • Illiterate persons.[3]

Vulnerable groups within the communities affected by the project will be further confirmed and consulted during Environmental and Social Assessment preparation through dedicated means, as appropriate.

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[3] The illiterate person may find it difficult to communicate with the POs and other project entities hence may be disadvantaged compared to other community members.

VI-   Stakeholder Engagement Program

A- Summary of stakeholder engagement during project preparation

A field visit was arranged during the project preparation and discussions were held with the flood affectees. A summary of these discussions is given below.

The environmental and social (E&S) focal persons of Sindh Government visited Kotri Tent City where flood affectees were residing. The team visited the water treatment plant and medical camp established for the affectees. The medicines to deal with fever, malaria, diarrhea, and skin diseases were available at the camp. The team also met with flood affected people and noted their concerns. Most of the people wanted to go back to their original location after receding the water and were willing to construct their houses with the grant money. Some of the people explained that they did not have their own land and if the government provide them house in any other area, they will be happy to go to the new location. The people suggested that the government should start the rehabilitation work on urgent basis as there are large number of children, women and patients among the affectees and before winter they want to return to their places.

B- Summary of project stakeholder needs, methods, and tools for stakeholder engagement

Strong citizen and community engagement are preconditions for the effectiveness of the project. The strategy for information disclosure and consultation may vary depending on the regional and local context. However, it is important that the different activities are inclusive and culturally sensitive, to ensure that vulnerable groups outlined above will have the chance to participate in and benefit from the Project while contained from potential pesticide risks. This can include, among others, household-outreach activities, group discussions, use of local radios, use of local mosques and the use of verbal communication or pictures. While province-wide awareness campaigns will be established, area specific communication and awareness raising consultation will be conducted when combating the infestation of locust in a given locality. The key consultation methods and tools are described below; these methods will be refined and finalized during project implementation.

- group discussion: this method would be used in areas where a large number of affectees can be gathered at one location such as a village
- Household outreach: this method would be more appropriate where the flood affectees can not be gathered for group discussion.
- Local mosques can be used to inform the people about the group discussions or household outreach
- Use of pictures, sketches and charts: this method would be useful to explain various design features of the houses and should be used during focus group discussions and household outreach.

Purpose and Timing of Stakeholder Engagement Program

The approach for the stakeholder engagement analysis will be underscored by three elements: (i) belief in the primacy of qualitative data; (ii) commitment to participatory methods; and (iii) flexible responsive methods. An inclusive and participatory approach has been followed taking the main characteristics and interests of the stakeholders into account, as well as the different levels of engagement and consultation that will be appropriate for different stakeholders.

In general, engagement is directly proportional to the impact and influence of a stakeholders. As the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular

stakeholder on a project increase, engagement with that particular stakeholder group will intensify and deepen in terms of the frequency and the intensity of the engagement method used.

The stakeholder engagement program aims to: establish a systematic and inclusive approach to stakeholder engagement; build and maintain a constructive relationship with stakeholders; incorporate stakeholders' views and concerns into project design/implementation; mitigate negative social and environmental impacts of the project; and enhance project acceptance and socio-environmental sustainability. Stakeholder engagement has been divided into two phases:

- **Phase I (Project Preparation)**: The purpose of stakeholder engagement during this phase has been to: ascertain institutional needs; apprise all stakeholders about planned activities; improve project design; create synergies; and enhance the socio-environmental sustainability of the project activities envisaged under the different project components.

- **Phase II (Project Implementation):** Extensive stakeholder engagement will be carried out during this phase with affected communities, disadvantaged/vulnerable groups and other interested parties. An exhaustive list of topics for stakeholder engagement during this phase along with the corresponding tools and techniques for conducting them is provided later in the Chapter (**Table 6**).

Proposed Strategy for Information Disclosure

Based on consultations with the implementing agency and following World Bank disclosure protocol, the following table provides an initial outline of the information to be disclosed at the preparation and implementation stages.

Table 4: Strategy for Information Disclosure

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Preparation	Affected parties, interested groups, public at large, vulnerable groups, Government entities	• Project Documents, • Environmental and Social Commitment Plan (ESCP) and SEP including GM E&S instruments	• PIU website • Print and electronic media • One-on-one meetings, • Consultation meetings • Radio and TV • Short Message Service (SMS) messages through cell phones • Announcements through mosques
Implementation	PIU and other relevant Government	• E&S principles and obligations, ESCP	• PIU website • One-on-one meetings

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
	departments and Private Institutions	• Consultation process/SEP including GM, • Environmental and Social Management Plans (ESMPs), and Resettlement Plans (RPs) • Other E&S instruments, • Grievance Mechanism (GM) procedures and project information	Consultation meetings • Radio and TV • SMS messages through cell phones Announcements through mosques
	Local communities (Communities around project areas) and Vulnerable groups (including local labor, disabled people, minorities, and women)	• Regular updates on project activities and specific interventions for vulnerable groups • SEP and GM procedures. • Consultations as per E&S instruments	• Outreach through local community organizations • Public notices • Press releases in the local media and on the project website • Mobile loudspeakers, • announcements in local mosques and communities in local languages • Dissemination of information through social media • Radio and TV • SMS messages through cell phones
	International donor agencies (WB)	• Scope of Project, opportunities for collaboration	• Biannual Consultative sessions with agencies to

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
		• regular updates on project progress • ESMPs, and RPs • Other E&S instruments, • SEP and its implementation	create synergies in the work undertaken and avoid duplication of efforts • Virtual meetings.
	NGOs, Media representatives Academia	• Scope of Project, opportunities for collaboration • ESMPs, and RPs • Other E&S instruments, • SEP and GM procedures.	• PIU website • Bi-Annual Project Dissemination Workshops
	General public	• Frequently asked questions (FAQs), • SEP and GM procedures	• PIU website • Mosque announcements in sub-urban areas • Local influential (councilors, community workers etc.) • Radio and TV • SMS messages through cell phones.

For the implementation stage, appropriate modes of communication and frequency of future engagements will be determined for each type of stakeholders, based on the outcomes of preparation stage consultations.

Proposed Strategy for Consultations

The proposed strategy of consultations during the subsequent phases of the project is presented below.

Table 4: Strategy for Consultations

Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Preparation Phase			

Topic of consultation / message	Method used	Target stakeholders	Responsibilities
• Need of the project • Planned activities • E&S principles, risk and impact, management • GM	• Virtual meetings providing background information • Phone • Emails • Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.)	PIU Officials Partner Organizations	PIU E&S Staff and GM focal points
• Proposed project components • Environmental and Social Risks and any other concerns stakeholders may have	• Phone • Emails • Individual meetings in person and virtually • Virtual Consultative workshops providing background information and discussing environmental and social risks • Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.)	• Communities including vulnerable groups • Relevant Government departments and organizations • Academia • NGOs' working in communities	PIU E&S Staff
Implementation Phase			
• Project progress on ongoing activities/targets and outputs • Implementation of ESMPs and RPs • SEP and its implementation • GRM Processes • OHS concerns • E&S concerns • Monitoring and Evaluation Plan	• Review of Project progress Reports • Emails • Meetings • Electronic publications as well as dissemination of hard copies of E&S Frameworks • Monitoring reports and reviews • Outcome of Gender Assessment (if carried out on need basis) • GM Reports •	• Communities including vulnerable groups • Relevant Government departments and organizations • Academia NGOs' working in communities	PIU E&S staff GRM Focal Points on GRM issues PIU E&S Staff – Project progress, implementation of the ESMP and the SEP, and E&S concerns

Topic of consultation / message	Method used	Target stakeholders	Responsibilities
• Project ongoing and planned activities • Implementation of ESMPs and RPs • SEP and its implementation • GM for public • E&S concerns	• Information resource portal on the PIU website with district data pertaining to project activities and GM information • Social media platforms (e.g. Facebook and twitter) of PIU • Outreach programs on radio and state-run television where the public can call-in	• General public, • Project area Beneficiaries • General community including vulnerable groups	GM Focal Points - GM Procedures PIU E&S Staff Project progress, implementation of the ESMPs, RPs and the SEP, and E&S concerns
• Project progress on activities. • Opportunities for collaboration • E&S Instruments • SEP and its implementation • GM Procedures • OHS concerns • E&S concerns	• Bi-Annual Provincial consultative meetings • Review of Project progress Reports • Information resource portal on the PIU website with district data pertaining to project activities and GM information • Print, electronic and social media	• Other ministries and public bodies, • Universities and research organizations • Print and Electronic Media, • NGOs and CSOs in each province/area • International Organizations such as International Labor Organization (ILO), Asian Development Bank (ADB), etc.	GM Focal Points PIU E&S Staff
• Information on safety and prevention measures • Implementation of ESMPs and RPs • SEP and its implementation • GM Procedures • E&S concerns	• Community meetings in disadvantaged/ vulnerable areas through local CSOs • Project Brochures, posters	• Affected individuals and their families • Local communities • Vulnerable groups	GM Focal Points E&S Staff

The frequency for consultations and reporting during the implementation stage will be determined within a month of the project effectiveness date.

Proposed Strategy to Incorporate the View of Vulnerable Groups

Consultations will be carried out with vulnerable groups near or in the vicinity of the project sites using Focus Group Discussion (FGD) as a tool. Engagement mechanisms and frequencies will accordingly be designed and customized for vulnerable people. This will continue throughout the Project life. A few such consultations have been held with communities in the project area in the preparation phase, which will continue in the implementation of the project.

Timelines

The frequency of stakeholder engagement will vary across the Project activities (quarterly, bi-annual or annual), depending on the nature/pace of activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. As consultations are held with stakeholders these timelines will be ascertained accordingly during implementation.

The project will review its stakeholder engagement against the SEP annually, and this review will be a part of the progress report that will be shared with the GoS and the WB. SEP will be revised as and when there is a need.

Review of Comments

All stakeholder engagement activities (FGDs, Key Informant Interviews (KIIs) and consultations) will be recorded and transcribed. Comments provided by stakeholders will be collated and reviewed following each engagement activity. These comments will be analyzed and formulated into a report which will be shared with all relevant entities including WB. To the extent possible, stakeholders' views and comments will be integrated and incorporated into the project design.

Future Phases of the Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism which will be conducted biannually. The table below presents a tentative plan for future consultations; this plan will be updated while updating the SEP during the project implementation phase.

Table 6: Future Consultations

Description	Target Stakeholders	Timing	Responsibility
• Public awareness campaigns/ information sharing sessions to share the ESMPs and RPs with the communities and other stakeholders. • Location: various places in project area	• Communities including vulnerable groups within project area, general public; and line departments/ agencies.	At the start of the site activities	PIU / POs
• Establishment of GM and Grievance Redress Committees (GRCs) • Location: various places in project area	• Communities including vulnerable groups at/around project area	Before commencement of project activities.	PIU / POs
• Consultations with the communities during ESMPs and RPs implementation • Location: various places in project area	• Communities including vulnerable groups at/around project area	During project implementation	PIU and POs

Description	Target Stakeholders	Timing	Responsibility
• Grievance redressal • Location: various places in project area	• PIU staff; consultants; relevant line departments; and communities.	Project implementation Stage	PIU and POs
• Informal consultations and discussions. • Location: various places in project area	• Communities including vulnerable groups at/around project area	Project implementation Stage	PIU and POs; contractor
• Consultations with the communities during internal monitoring • Location: various places in project area	• Communities including vulnerable groups at/around project area	Construction Stage	PIU and POs
• Consultations with the Communities during the Independent Monitoring • Location: various places in project area	• Communities including vulnerable groups at/around project area	Construction Stage	PIU and POs
• Consultation workshops to review ESMPs and RPs implementation, any outstanding issues and grievances, views and concerns of communities; and actions needed to address them. • Location: site offices in project area.	• Communities including vulnerable groups at/around project area; relevant line department; relevant NGOs	Six-monthly during implementation phase	PIU and SC
• Consultations with the communities during the site visits by the World Bank Review Missions. • Location: various places in project area.	• PIU; Communities including vulnerable groups at/around project area	Construction Stage	PIU; WB Mission

C- Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, especially regarding guidelines on operations in line with health and safety procedures. This will include bi-annual reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. This will be important for the wider public, but specifically critical for the directly impacted community members.

VII- Resources and Responsibilities for Managing SEP Activities

A- Management functions and responsibilities

A Project Implementation Unit (PIU) will be set up by the GoS. The role of PIU will be overall project management and implementation, providing leadership to the Implementation Partners (IP) and coordination with all implementing partners, and effective communications and stakeholder engagement. The stakeholder engagement activities will be carried out and documented by the PIU and POs through quarterly progress reports, to be shared with the World Bank (responsibilities of various consultation activities have been described in tables provided earlier for Strategy for Consultations and Future Consultations).

The project will maintain coordination and liaison with other flood response projects in the province and also in other areas of the country.

B- Resources

As mentioned earlier, SEP will serve as a guiding document for the Stakeholder Engagement of the Project. All activities related to improving communications and engagement capacity within PIUs will be financed under the project, including activities for effective implementation of SEP recommendations. The SEP implementation cost has been estimated to be USD 50,000 that includes costs associated with consultation and engagement activities, stakeholder workshops, focus group discussions, satisfaction surveys, participatory planning, and GM implementation. This estimate will be reviewed and revised if required during the next revision of this SEP.

VIII- Grievance Mechanism

The project will establish a Grievance Mechanism (GM) through which, the project affected persons as well interested persons, local communities and the public are able to raise issues on the project. The GM will guarantee privacy and confidentiality on the part of the aggrieved party.

The main objective of a GM is to assist resolve complaints in a timely, effective and efficient manner. Project-level GMs can provide the most effective way for people to raise issues and concerns about project activities that affect them. The project-level GM will be culturally appropriate, effective, accessible and should be known to the affected population. The PIUs will conduct awareness raising for the affected communities about the presence of the GM and inform their right to file any concerns, complaints, and issues they have related to the project.

The GM provides a transparent and credible process for fair, effective and lasting outcome. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the project implementation;

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

- Avoids the need to resort to judicial proceedings.

A- Approach to GM Establishment

Grievance redress committees will be established at the provincial and district levels (and if appropriate, at the village level also) to ensure accessibility and transparency of the GM. The GM will serve as a focal point for addressing grievances related to the project with provision of appropriate training for the committee members regarding the requirement in the project.

Where available, the PIU will build upon and use the existing GM systems developed for the ongoing World Bank projects. They will ensure the GM guidelines detail the procedure, timing, indicative committee members, as defined in the ESCP. Resources will be allocated for the GM. The complaints recorded, resolved and referred will be reported quarterly and annually together with the environmental and social implementation performance report. The composition of GM will be discussed with stakeholders and proposed based on the feedback and suggestions. This will be constituted and notified prior to commencement of the project. The modes available to the stakeholders to launch their complaints or grievances will be worked out later based upon detailed consultations however these

modes may include in person, emails, phone calls, SMS, and messages through WhatsApp. The full details of the GM will be provided in the updated SEP.

IX- Monitoring and Reporting

During project implementation, the SEP will be periodically updated, as necessary, consistent with the requirements of ESS10, in a manner acceptable to the Bank. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. The PIU will prepare and submit to the Bank quarterly and annual SEP implementation reports including ESHS performance and other environment and social instruments of the Project, including the grievance mechanism. 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 conveyed to the stakeholders in following the ways: (i) publication of a standalone annual report on project's stakeholder engagement; and (ii) Key Performance Indicators (KPIs) will also be included and monitored by the project on a regular basis as part of the Community Communication and Outreach Guideline.

Further details will be outlined in the updated SEP, to be prepared within 30 days of the Project effectiveness, including the establishment of detailed stakeholder's communication guideline.

GBV/SEA/SH Responsive GM

An intermediary GBV service provider will be hired with the responsibility of addressing the SEA/SH complaints with a survivor-centered approach. The GM will have multiple channels to initiate GBV/SEA/SH complaints. A GBV/SEA/SH committee will be set up to oversee the service provider and response to GBV/SEA/SH incidents. The GBV/SEA/SH GM will ensure confidential reporting with safe and ethical documenting of sexual exploitation and abuse/sexual harassment (SEA/SH) cases and will include appropriate mechanisms for referral to service providers. The SEA/SH GM will alert the project GM regarding the project related SEA/SH allegations and can also refer cases to other GBV service providers. The service provider will report to the IA with minimal information which should include number of project related SEA/SH allegations received and /or referred by the grievance mechanism disaggregated by age and sex, the number of open cases and the average time they have remained open, and the number of cases closed and the average time they had remained open. The GM operator will report with minimal information to the IA who will in turn report to the Bank team along the four lines on a) the nature of the case, b) if the case is project-related c) age and sex of the survivor (if available) d) if the survivor was referred to services.

The PIU will disseminate GM procedures in the communities. All GM personnel will be trained on GBV/SEA/SH response. The details of the GBV/SEA/SH GM and its linkage with the project GM will be developed in the GBV/SEA/SH Action Plan.