STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)

ACCELERATING TRADE FACILITATION AND LOGISTICS IN THE PACIFIC (P508537)

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Table of Contents

List of Tables:

List of Annexes:

ABBREVIATION AND ACRONYMS

EAP	East Asia Pacific
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IPF	Investment Project Financing
NSW	National Single Window
OHS	Occupational Health and Safety
OIPs	Other Interested Parties
PAPs	Project Affected Parties
PMU	Project Management Unit
PICs	Pacific Island Countries
PIF	Pacific Island Forum
PTF	Pacific Trade Facilitation
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan (Country Level)
SEF	Stakeholder Engagement Framework (Project Level)
TA	Technical Assistance
TIP	Trade Information Portal

1. INTRODUCTION

The Accelerating Trade Facilitation in the Pacific Project (the Project) aims to support Pacific Island Countries in reducing the time and cost of cross-border trade and strengthening crisis resilience through trade facilitation. The reduction in time and cost for cross-border trade will have a direct benefit on firms and households through lower costs and faster access to markets. This part of the PDO will be assessed using existing, globally standard methodological approaches (e.g. time release studies). Trade facilitation can also strengthen crisis resilience by maintaining access to critical crisis response goods in the preparation and aftermath of a crisis. This part of the PDO will be assessed based on the number of specific measures introduced through the project to facilitate crisis-response related trade (eg fast track facilitation measures for vaccines or other goods; improved equipment and practices to maintain port operations following crises, etc).

The Project was requested by Pacific leaders during the 2024 visit of the World Bank President and is expected to help implement key aspects of the Pacific Regional Trade Facilitation Strategy through investments into digitalization, equipment, and capacity building. Each of the project components builds upon extensive WBG technical assistance and operational experience in the areas of trade facilitation and maritime transport as well as regional coordination on trade facilitation. At the country level, this will lead to faster and less expensive trade with better market access; at the regional level, harmonized trade facilitation systems can build economies of scale and further reduce costs. The Project will be implemented in Fiji, Solomon Islands, Vanuatu, Tonga, Tuvalu, and Kiribati. Other Pacific countries may join the Project in the future.

2. BACKGROUND

The Pacific Region Context. The Pacific Island Countries (PICs) are characterized by small populations spread across vast areas. The 12 PICs which are members of the World Bank include Papua New Guinea (PNG), Fiji, Kiribati, the Marshall Islands, the Federated States of Micronesia (FSM), Nauru, Palau, Samoa, the Solomon Islands, Tonga, Tuvalu, and Vanuatu. These island nations are characterized by smallness and remoteness, with low populations spread across 15 percent of the Earth's surface.[1] The Pacific region has 11.5 million people with populations ranging from PNG (approx. 9.0m) and Fiji (900,000) at the higher end down to Nauru and Tuvalu (approximately 11,000 each). Physical connectivity is challenging, with irregular and often unreliable flights and other travel options. Pacific Island countries are also some of the most vulnerable in the world to the effects of climate change and disasters. The World Risk Index 2020 ranks five Pacific Island countries among the top 20 most at-risk countries, including Vanuatu and Tonga, which are ranked first and second, respectively. All the countries are vulnerable to external shocks and six are Fragility, Conflict and Violence (FCV) countries.

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[1] For example, Kiribati is one of the world's most remote and geographically dispersed countries, consisting of 33 coral atolls spread over 3.5 million square kilometers of ocean, an area larger than India. It also has the lowest GDP per capita in the region, closer to those found in sub-Saharan Africa.

Several structural challenges, including remoteness, geographic dispersion, and small market size, undermine economic development in the Pacific. These factors naturally lead to higher costs and limits in the economies of scale that PICs can achieve. Unlike the East Asian countries, the development path of the PICs has not relied on manufacturing-led development, given the high trade costs. As a result, countries in the Pacific tend to have narrow production and export bases, dominated by tourism and trade of primary commodities such as fish and wood, where the countries have a comparative advantage.

Sectoral Context. Trade across borders in the PICs is costly and slow for intrinsic and extrinsic reasons. The PICs have low container shipping connectivity, resulting from low trade volumes, fewer port calls, and limited trade opportunities. This makes shipping costly and less attractive to shipping lines. For instance, there is only one international cargo shipping operator in Kiribati, with infrequent arrivals connecting to limited locations. Similarly, Niue has only one ship per month, and Nauru averages 8-10 ships per year, posing a threat to food security if the ship does not arrive as scheduled. Furthermore, the lack of coordination between port stakeholders often leads to unnecessary delays in vessel and cargo clearance processes, increasing logistics costs for domestic and regional traders. The implementation of data-sharing platforms, such as single windows or community systems, is still pending in most countries, hindering ports from reaching their full potential in terms of efficiency, resilience to external risks, and reducing their environmental impact. Maritime safety, particularly for domestic sectors, is also a critical issue that needs attention in the PICs.

Costs are further driven by logistics and trade infrastructure gaps and excessively complex and costly procedures at the border. Detailed analytical and advisory work carried out since 2015 in the Pacific revealed that border processes remain complex and pointed to some common issues, including the following: (i) lack of coordination and information sharing between border agencies, which greatly increases the time to clear cargo at wharf and compliance costs; (ii) absence of electronic system outside of customs, meaning that traders must deal with manual processes at all other agencies (that typically requires multiple visits to different offices); (iii) absence of risk management systems to provide a fast track for traders with a good compliance record; and (iv) the information on regulations, fees and administrative procedures that traders must comply with is difficult and time-consuming to find, which increases costs and reduces compliance levels.

The Pacific Regional Trade Facilitation Strategy (PRTFS) encapsulates the strong regional demand for trade facilitation reform. Developed by the Pacific Islands Forum (PIFS) with support from the World Bank Group (WBG), the strategy aims to reduce the time and cost of trading goods across borders, boosting trade in the Pacific. The PRTFS contributes to the Resource and Economic Development thematic area of the 2050 Strategy for the Blue Pacific Continent (2050 Strategy). It is expected to stimulate the growth of international and intra-regional trade. The primary purpose of the PRTFS is to implement regional reforms (actions) to reduce the time and cost of trading goods across borders. The Strategy defines five strategic objectives that lead to twenty-two regional actions.

3. PROJECT DESCRIPTION

3.1. Project Component

The Project includes three components, combining regional impact with the flexibility to customize specific investments to the needs of each country participants. In every country, the Project will finance the implementation and/or expansion of the National Single Window for trade, which will ensure a common digital approach to trade throughout the Pacific, enabling easier exchange of data and promoting economies of scale in trade. In addition, each country will have access to capacity building and training materials for businesses. The Project will additionally finance equipment and preparatory studies, with the specific nature of these investments customized to the context of each country. Finally, a component on regional coordination will help maximize synergies across countries while also helping to spread awareness of Project reforms and approaches to other Pacific economies not in the Project.

Component 1: Efficient Trade Facilitation. This component finances work on the National Single Window for trade in each country with investments into hardware, software, and process reforms. The component also finances capacity building and training activities to facilitate more businesses to access export markets.

Sub-component 1.1: Digitizing cross-border trade. The sub-component will finance the design, development, and implementation of a National Single Window (NSW) integrated solution and the associated reform and modernization of customs and other border management agency requirements for the digitalization of processes and procedures for cross-border trade and access to trade-related information through a Trade Information Portal (TIP). The following investments are expected under the Sub-Component:

- ❖ The core customs management system will be financed for each country, in most cases through the licensing and implementation of the ASYCUDA solution. The system will also allow for the exchange of trade-related info for risk management, clearance and release of cross-border trade, including an Integrated National Targeting Center, and access to trade-related information through a Trade Information Portal (TIP).
- ❖ The project will invest in the digitalization of processes and procedures for cross-border trade within the Customs Service and other key border management agencies that will share data through the integrated platform (such agencies may include Biosecurity, Health/ food safety, standards and technical regulators).
- ❖ The Project will finance pre-implementation activities before procuring the system. These activities involve reviewing the current national legal and regulatory framework for trade and other related areas that govern the functions and operations of the single window. The legal review will establish whether there are any legal impediments to the implementation of an NSW and identify any gaps in the current legislation. Then, a Roadmap for implementation will be developed, including the governance structure to oversee the single window; the operational model and fee structure to implement the model; an integrated grievance redress mechanism, and change management systems and organizational and human resource management in the customs and border agencies.

Sub-component 1.2: Export readiness capacity building for firms. The sub-component will finance awareness, training, and capacity building activities for firms to boost their knowledge of trade facilitation requirements, export market access regulations, and resources to help them become exporters. The activity will also help increase the share of women headed businesses exporting their products by addressing knowledge and capacity constraints. As a regional project, an online training curriculum will be developed that can be deployed at the country level either independently by firms or delivered via country stakeholders. This sub-component will also coordinate with sectoral interventions (e.g. in agri-production, fisheries, light manufacturing, etc.) to help strengthen market access for firms at the sector level.

Component 2: Trade Facilitation and Operations Improvement. This component will finance equipment and assets for trade facilitation as well as preparatory and feasibility work on larger investments. Specific equipment needs at the country level have been identified from a list of options that covers scanning, testing, quality, safety, and management needs (e.g. container scanners, forklifts, vessel and container tracking systems, etc.). The investment needs have been prioritized based on the impact on port turnaround and complementarity with ongoing ports investments by governments, the private sector, and development partners.

Subcomponent 2.1: Trade facilitation equipment and assets. This sub-component will finance:

- ❖ The acquisition of equipment and assets needed by the customs and port authorities to assess and process cross border trade including scanning, testing, quality, safety, logistics, tracking and management needs. A close-ended list of trade facilitation and logistics enhancing assets has been used to prioritize such investments at the country level, including -inter alia- X-ray scanners to check containers and cargo for prohibited items, container wash bays to facilitate compliance with import requirements in key regional trade partners, weighing equipment for verifying the weight of cargo ensuring compliance with road weight limits, laboratory testing equipment for conducting sample test of cargos, cranes to load and unload containers from and to shore, forklifts for moving smaller cargo or pallets, vessel and container tracking systems, and ports safety equipment.
- ❖ Capacity building on the operation and maintenance of these equipment and assets to relevant authorities.
- ❖ Investments that will help facilitate resilience to natural and climate related hazards and facilitate continuous access to foreign markets in the preparation and response to a crisis. Investments in this area may include excavators, aids to navigation, and specialized storage equipment.

Subcomponent 2.2: Preparatory and feasibility work for larger trade investments. To reduce trade time and costs significantly, large physical improvements will most likely be necessary in the mid-term. While the project is not envisaged to finance any civil works, the subcomponent will assist in preparatory activities in the maritime sector for future projects that could be funded by the World Bank and other development partners. This will include logistics assessments that will identify existing gaps in trade facilitation and how to mitigate these gaps in selected Pacific countries. This subcomponent will include, according to the needs of each country, a master plan, pre-feasibility studies, feasibility studies, environmental and social assessments, port operation efficiency improvement, port governance improvement, including private finance mobilization

where possible, and/or resilience enhancement study for port operation. The activities will also be decided considering other development partners' projects and initiatives in the same sector.

Component 3: Project Management and Regional Capacity Building. This component will finance project implementation at the country level and includes a grant to the Pacific Islands Forum Secretariat as a key regional body to help coordination regional trade facilitation reform in line with the Pacific Regional Trade Facilitation Strategy.

Sub-Component 3.1 Project Implementation Management. This subcomponent will finance project Management Units and their operations. Implementation arrangements will vary by country with a focus on using third party implementation where possible. Where third party implementation is not used, the Project will finance PMUs to ensure there is sufficient procurement, financial management, safeguards, and project management expertise to implement the activities. Most of the Project country participants also maintain shared services units that can help build implementation capacity where needed.

Sub-Component 3.2 Capacity building in regional bodies to support trade facilitation reform. While most project resources are delivered through country-level interventions, the project also seeks to strengthen regional capacity to support trade facilitation reforms. This recognizes the regional nature of trade facilitation and ensures country-level investments remain aligned to broader regional commitments (WTO TFA obligations, the PIFS Regional Trade Facilitation Strategy, etc.).

To achieve this regional coordination, the Project includes a proposed grant to the Pacific Islands Forum (PIF)[2]. Within the sphere of trade, the PIFS has the regional mandate on trade facilitation and trade policy. The PIFS also leads the Regional Trade Facilitation Strategy for the Pacific, which includes a strategic objective to support the implementation of integrated solutions for the digitalization of processes and procedures for cross-border trade and cross-border electronic information exchange in member countries. The Secretariat has been tasked with coordinating the Pacific Trade Facilitation (PTF), including coordinating the implementation of the Pacific Regional Trade Facilitation Strategy and Roadmap.

- ❖ Resources will be provided in the form of a grant to PIFS to strengthen its capacity to manage the Regional Trade Facilitation Strategy. In particular, this grant will be used to establish a dedicated unit at the PIFS comprising full-time staff, namely a Coordinator and an Officer, which will be funded through the project.
- ❖ Pacific Trade Facilitation Coordinator: The Coordinator will oversee the Unit's work, ensuring the delivery of high-quality outputs. Responsibilities include managing consultants, undertaking research and contributing to joint publications, establishing and overseeing an M&E framework for the regional strategy, strategic planning, fundraising, and engaging with relevant stakeholders.
- ❖ Pacific Trade Facilitation Officer: The officer will manage the M&E framework for the Regional Strategy - data collection, clean-up, elaboration, and dissemination. Duties would also extend to providing secretarial support to the Pacific Trade Facilitation Committee, as well as administrative and financial responsibilities such as drafting reports, accounting tasks, developing financial acquittals, managing logistics for staff and

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[2] The Pacific Islands Forum is an inter-governmental organization that aims to enhance cooperation among the 18 Forum Members to deepen forms of regionalism in support of sustainable development, economic growth, good governance, and security. Its role is policy advice, coordination, and ensuring the effective implementation of the Forum Leaders' decisions, leading to tangible improvements in the lives of the people of the Pacific.

consultants during missions, and liaising with PIF procurement and legal departments. Communication duties will include managing newsletters, conducting social media campaigns, developing tailored promotional material, and maintaining and updating the Pacific Trade Facilitation Portal.

3.2. Project Beneficiaries

The project will directly and indirectly benefit business and households for the ~2 million inhabitants of Fiji, Solomon Islands, Vanuatu, Tonga, Tuvalu, and Kiribati. Direct project beneficiaries include businesses and individuals engaged in cross-border trade. This includes firms exporting their products to regional and global markets, as well as firms and individuals importing intermediate and consumption goods. These beneficiaries will have lower costs and faster clearance times for their goods as a result of the project. Another cohort of direct beneficiaries includes businesses that are not currently exporting due to their lack of awareness of ability to comply with trade facilitation regulations and processes. The project includes capacity building and training activities aimed at bringing more businesses into cross border trade, particularly for female headed businesses. Indirect beneficiaries include businesses and households who purchase imported goods. These beneficiaries will see some cost reductions both through the project interventions to reduce costs as well as through a potential increase in traders, leading to greater competition. Finally, the Project is expected to benefit people in the aftermath of natural and climate related hazards by enabling faster access to crisis response goods.

3.3. Implementation Arrangement

The project will be implemented through Project Management Units (PMUs) in each participating country. The PMUs will be responsible for overall project management in close coordination with implementing agencies and to ensure compliance with fiduciary and safeguard requirements. Given the limited scope of procurement activities, only a single PMU per country is envisioned; implementing agencies will cooperate through this joint PMU rather than have in-house implementation units. PMUs will also be responsible for coordination among country-level stakeholders, including Ministries of Trade, Customs Agencies, Ports Authorities, and other upstream border management agencies (biosecurity, standards, etc.) many of whom will be nominated as formal Implementing Agencies (IAs) for the Projects and will be responsible for implementing key measures. Component 3 includes funding to staff the PMU with the necessary technical specialists in procurement, financial management, environmental and social (E&S) risk management, project management, and so on. It is expected that PMUs will formalize coordination among IAs and key stakeholders through a country-level steering committee and/or MOUs between the PMU and these agencies.

The Project will streamline implementation as much as possible to address capacity constraints. One of the lessons learned from other regional/ multi-country projects is the need to simplify implementation arrangements as much as possible both to respond to capacity constraints at the country level and to help mitigate complexity that arises from having multiple countries in a single operation. Some opportunities to simplify implementation at the country level include: (i) coordination with the shared services units that exist in many project countries to help build PMU capacity; (ii) the use of third party implementation for some, or all project activities; and (iii) bank facilitated procurement for specific activities that are largely the same across countries.

Regional coordination will be facilitated through existing regional bodies. The project will work closely with two regional bodies responsible for trade facilitation – the Trade Facilitation Unit within the PIFS and the Oceania Customs Organization. PIFS will also serve a formal coordination role in the Project through its regular Forum Trade Officials meetings and Forum Trade Ministers meetings. The Project will be presented at each of these meetings, providing a regular venue to discuss project progress and address constraints to implementation. These meetings will also help spread Project information to non-participating countries and promote greater regional synergies.

4. ENVIRONMENTAL AND SOCIAL OVERVIEW

The Pacific Island Countries (PICs) covered by this operation (Tuvalu, Fiji, Tonga, Kiribati, Vanuatu, and Solomon Islands) are characterized by their small size, remoteness, geographic dispersion, and high degree of exposure to economic shocks, climate change, and natural disasters. Although extreme poverty is uncommon, poverty and hardship exist, and access to cash incomes, basic infrastructure, social services, and nutritious food is uneven. Because the population is dispersed, often across archipelagos, physical connectivity is challenging with irregular and often unreliable flights and other travel options affecting travel across the region. Pacific Island countries are also some of the most vulnerable in the world to the effects of climate change and disasters. All the countries are vulnerable to external shocks and six are Fragility, Conflict and Violence (FCV) countries.

The Project will finance activities and investments across a diverse range of countries in PICs with varying environmental and social characteristics, each providing its own opportunities and risks. Overall, the Project will result in reduced environmental impact of trade, particularly through digitalization customs initiatives. This includes (a) reduced greenhouse gas emissions, (b) reduced waste generation and (c) resource consumption related to trade processes. Digitalization of trade procedures will promote paperless trade processes and online trade information portals which can reduce the carbon footprint of trade transaction. Paper waste may decreased as a result of streamlined procedures through enhanced online trade procedures that reduce the requirement for paper-based documents. Energy usage related to traditional trade processes can be reduced by digital trade facilitation.

The Project's overall E&S risk classification is *Moderate*. The Project activities may result in direct, indirect and downstream environmental and social impacts. The impacts are expected to be temporary, predictable, low to moderate in magnitude and readily managed through the implementation of risk management measures set out in this document. Minor civil works required to facilitate installation and storage of equipment and assets for custom and port authorities have the potential to generate E&S impacts as does procurement of the equipment and digital infrastructure investments.

Key environmental and social impacts and risks are listed below:

➢ *Occupational health and safety (OHS)*. The use and procurement of heavy vehicles for this project involve significant occupational health and safety risks, including falls from height,

vehicle collisions, ergonomic hazards, chemical exposure, driver fatigue, and equipment failure. The Environmental and Social Code of Practice (ESCOP) addresses these issues through comprehensive safety protocols, regular risk assessments, clear operating procedures, and training requirements, all outlined in the POM and enforced during procurement and operation. Vehicle safety features specified in ESCOP, such as load monitoring systems, stability control, operator safety cabins, and anti-slip technology, are required in both bidding documents and supplier contracts. Operators must be trained and certified per relevant standards. Control measures include daily pre-operational checks, secure load handling, careful path planning, traffic management, mandatory PPE, fatigue management, and routine vehicle maintenance—all aimed at minimizing workplace hazards and ensuring compliance with ESCP provisions. The construction contractors will be exposed to OHS risks during civil works. Risks will arise from a range of hazards such as the use of hazardous materials, heavy machinery, movements of trucks, working at high, falling objects, exposure to toxic welding gases, chemicals, noise, emissions etc. ESCOP for managing the construction stage OHS risks are included in Annex 2 and shall be integrated into the contractor bidding documents as per the provisions in ESCP. Each participating country will include Labor Management Procedures (LMPs) in their POM, addressing labor risks and compliance with ESS2. Contractors and subcontractors must also implement OHS measures and enforce worker Codes of Conduct.

- ➢ *Resource efficiency and pollution prevention and management*. Key pollution risks include waste generation during construction and operations, end-of-life disposal of replaced equipment, and wastewater from washbay facilities. Managing hazardous waste is challenging due to the lack of suitable disposal facilities in many target countries, requiring strict adherence to ESS3, including chain of custody documentation and use of approved disposal sites. ESCOP (Annex 2) mandates mitigation hierarchy, supplier take-back of replaced equipment and hazardous waste, and integration of these practices into project operations and contracts. Wastewater from container washbays must be treated to international and local standards, leveraging existing port facilities or installing compliant systems when needed. Civil works will be minor, with limited resource use, and extraction of materials from sensitive areas is prohibited. The project aims to reduce emissions, waste, and resource consumption, especially through digital customs initiatives. Preparatory studies will integrate E&S assessments and formal review processes to address future resource and pollution impacts.

- ➢ *Community health and safety*. The project, situated within existing port facilities, is not expected to significantly affect local community health, safety, or security. Potential risks from transporting equipment and heavy vehicles will be managed through strict safety measures (ESCOP – Annex 2), including trained drivers, vehicle maintenance, and enforcement of traffic laws. Security arrangements will follow the International Ship and Port Security (ISPS) code, supplemented by assessments of security forces, training in proper conduct, and an established grievance mechanism to align with ESS4 standards. SEA/SH risks are moderate and will be managed through the measures described in the FESA.

- ➢ *Biodiversity and cultural sites.* The Project does not involve any new construction which could affect terrestrial biodiversity and / or cultural sites. However, given that communities of the participating countries rely on coastal and lagoon habitats for ecosystem services, increased discharge volumes of wastewater have the potential for minor impacts to biodiversity such as fish kills or damage to coral from sedimentation. The screening procedure (Chapter 5) will

exclude activities that would lead to adverse impacts on natural habitats whether directly or indirectly. Any waste disposal site which would adversely affect natural habitats, or cultural sites would not be used under the Project.

➢ **Downstream impacts.** Technical Assistance (TA) activities may result in downstream impacts from future development, construction activities, and civil works. Examples of impacts include changes to drainage or groundwater contamination from poor planning, use of finite resources and the associated impacts (e.g., for aggregate extraction), requirements for land, risks to surrounding communities human health and vulnerable groups, poor stakeholder engagement leading to opposition to the project, and the generation of dust, noise and waste from construction and rehabilitation activities or civil works.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF).

5. WORLD BANK STANDARD ON STAKEHOLDER ENGAGEMENT

This Stakeholder Engagement Framework (SEF) is developed to promote participation of both affected and interested stakeholders so that the Project design, in particular stakeholder engagement approaches and activities are implemented in a participatory and inclusive manner, transparent, promote equal opportunity, and minimize environmental and social risks.

This SEF is following the objectives of The Environmental and Social Standard 10 (ESS10) of the World Bank's Environmental and Social Framework (ESF):

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

According to the definition provided in the ESS10, "stakeholder" refers to individuals or groups who:

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

6. OBJECTIVE AND KEY PRINCIPLES

Under the ESS10, a Stakeholder Engagement Plan (SEP) should be developed that sets out the principles and procedures for stakeholder engagement in a manner that is consistent with ESS10 and implemented proportionate to the nature and scale of the project and its potential risks and impacts.

In certain instances where the specifics for creating a detailed SEP are not available, a stakeholder engagement framework (SEF) may be adopted. This SEF is being developed as a roadmap and part of an iterative process in communicating with stakeholders, laying down the path of how the Project will interact with stakeholders, external and internal alike. This SEF is the starting point of an iterative and is complemented by a more comprehensive stakeholder engagement plan covering country level activities (i.e. Stakeholder Engagement Plan or SEP). To allow uptake of Stakeholders concerns and problems during the project planning stage, guidance on how to

develop a fully functional Grievance Mechanism is developed and presented in detail in Chapter 10.

In order to meet good practice approaches, the Project will apply the following principles for stakeholder engagement:

- *Openness and early on and life-cycle approach*: Public consultations will be arranged during the whole life cycle starting during planning, 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 are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns. Stakeholders should have sufficient knowledge on the different themes to be able to give sound, adequate and appropriate feedback.
- *Inclusiveness and sensitivity*: Stakeholder identification is undertaken to support better communications, build effective relationships and sensitize the engagement methods tailored to meet the needs, expectation, and divergence of various stakeholder groups and individual. The participation process for the project is inclusive. All stakeholders are 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, in particular women, youth, elderly, and the cultural sensitivities of diverse ethnic groups. Therefore, stakeholders must be inculcated, integrated, and be provided with the capacities, conditions and motivated to participate.
- *Adaptive engagement management*: engagement strategies shall be adapted if mismatch of expectations amongst various stakeholders becomes evident (e.g. institutional and NGOs) or if the strategy shows shortcomings in soliciting and enabling feedback for various reasons (inadequate transparency, inappropriate format, etc.)

7. DEVELOPMENT OF A STAKEHOLDER ENGAGEMENT PLAN

As mentioned above, this SEF serves as a roadmap for development of a SEP covering each country that will be integrated into the Project Operations Manual. This will propose targeted stakeholder engagement programs which largely depend on the details, including the footprint, geographic location, and timing of the Project activities in each location. The scope and level of detail of the SEPs should be commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project and might be prepared for a certain group of project activities in the same area. It is noted major components of the project relate to procurement of technical equipment and infrastructure that will occur wholly within the footprint and operations of existing customs and border control facilities, and policy and systems development that relate only to relevant government and industry stakeholders. Thus, there are few, if any, impacts on surrounding communities or specific vulnerable groups or beneficiaries of these specific activities, which consequently limits the level of concern amongst a broad spectrum of stakeholders. It is noted that TA for upstream feasibility analysis and assessment for future investments will have a significantly larger downstream area of impact which will be relevant for broader stakeholder engagement planning. The analysis carried out considers the local context, the existing situation and values the good practices and requirements linked to inclusive, responsible, and constructive consultations.

This SEF has been disclosed and the views of stakeholders on the SEP covering each country shall be sought, including on the identification of stakeholders and the proposals for future engagement. The SEP shall be updated if significant changes are identified. The SEP describes the timing and methods of and implementing agencies' engagement with stakeholders throughout the life cycle of the project as agreed with the Bank, distinguishing between Project-affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to Project-affected parties and other interested parties, as well as the type of information to be sought from them.

The SEP will include a procedure on receiving, addressing, and responding to grievances (grievance mechanism to receive and facilitate resolution of project affected parties/PAPs concerns and grievances). It is required to implement the grievance mechanism and respond to concerns and grievances of Project-affected parties related to the environmental and social performance of the Project in a timely manner.

The SEP should be clear and concise and focus on describing the project and identifying its stakeholders. Each SEP shall have the list of identified stakeholders and their analysis and will ensure that those (i) that are affected or likely to be affected by the project (project-affected parties); and (ii) may have an interest in the project (other interested parties) are adequately identified and classified. Some groups may be interested in the project because of the sector it is in, and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open and accessible to anyone interested. Based on the analysis the SEPs, adopt the engagement strategies based on stakeholder needs and analysis of their Interest and Influence. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, reduced mobility, lack of understanding of a consultation process).
- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples: choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns).
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

The SEPs will briefly describe what information will be disclosed in what forms, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience. The focus will be on segregating what the

key information will be in public domain, in what languages, and where it will be best accessible to allow inclusive access.

The SEPs needs to be targeted and should demonstrate the ability to develop a strategy that is stakeholder specific, concise yet comprehensive and should explain the opportunities for information access, public consultation, provide a deadline for comments, and explain how people will be notified of new information or have opportunities to provide feedback including how these will be assessed and considered.

8. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The identification and mapping of stakeholders facilitates targeted engagement mechanisms and understanding the objectives, interests, and incentives of key stakeholders. For consultations, representative stakeholders, including representatives of marginalized and vulnerable groups, need to be identified at the national, regional, and local levels as applicable.

ESS 10, read in conjunction with ESS1, recognizes the following categories of stakeholders:
1. **Project Affected Parties.** These includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, wellbeing, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project.
2. **Other Interested parties (OIPs)** refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups. The stakeholder identification has been expanding to a wider area than the project will affect, since the locations have not all been identified, and important details of project activities are still under development.
3. **Disadvantaged/Vulnerable Individual or Groups**. Includes those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will consider considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon whom they depend.

8.1. Project Affected Parties (PAPs)

Identify individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively. The SEPs should focus particularly on those directly and adversely affected by project activities. Mapping the impact zones by placing the affected communities within a geographic area can help define or refine the project's area of

influence. The SEPs should identify others who think they may be affected, and who will need additional information to understand the limits of project impacts.

8.2. Other Interested Parties (OIPs)

'Other Interested Parties' constitute broader stakeholders who may be interested in the project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. While these groups may not be directly affected by the project, they may have a role in the project preparation and implementation (for example, government permitting) or be in a community affected by the project and have a broader concern than their individual household.

Moreover, civil society and nongovernmental organizations may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the Borrower to consider and address in the assessment process. Some groups may be interested in the project because of the sector it is in (for example, mining or health care), and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open to anyone interested.

8.3. Disadvantaged / Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionally affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies.

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, reduced mobility, lack of understanding of a consultation process).
- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print, or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns).

- If there are no organizations active in the project area that work with vulnerable groups, such as persons with reduced mobility, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

Within the project, the vulnerable or disadvantaged groups may include and are not limited to the following:
- Elderly 65+
- People with chronic medical conditions
- Women
- Girls from 10 to 17 years old
- Young people aged 18 to 35 who have not attended schools.
- Young people aged 18 to 35 with the capacity to design and carry out projects.
- Young people aged 18 to 35 with the capacity to design and carry out income-generating projects.
- People with reduced mobility of any nature regardless of if under permanent care or self-cared.
- Single parent headed households.
- Female heads of low-income household or with young children.
- Economically marginalized and disadvantaged groups.
- Communities in remote and inaccessible areas with low communication.
- All the above categories residing in geographically challenging areas.
- Migrant workers accommodated in worker camps, persons with limited literacy and education levels.
- People living of the ecosystem services without diversified livelihoods.
- Internal displaced people
- LGBT+ (Lesbian, Gay, Bisexual, and Transgender/Transexual People)

Vulnerable groups within the communities affected by the project will be further confirmed 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.

8.4. Summary of Stakeholder Engagement Needs and Analysis of Their Interest and Influence

Identified stakeholder groups and their level of influence cross-referenced with their interest they may have in the project will determine the type and frequency of engagement activities necessary for each group. The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project:

Table 1. Stakeholder Analysis Matrix

Activity	Stakeholder	Potential Participation/Interaction with the Project	Levels of Interest	Level of Influence	Level of Engagement

The key Identified stakeholder groups and their level of influence cross-referenced with their interest they may have in the project will determine the type and frequency of engagement activities necessary for each group.

9. STAKEHOLDER ENGAGEMENT PLAN (SEP)

9.1. Purpose and Timing of Stakeholder Engagement

Stakeholder engagement is a key pillar for the success of the Project, including the sustainability of the interventions and outputs achieved. It is an inclusive process initiated and conducted throughout the project life cycle. Project stakeholders will be mobilized in distinct and appropriate ways, depending on their different interests and circumstances, to meet the objectives of the SEP which are to:

i.   Establish a systematic approach to stakeholder engagement that will enable the Project Management Units (PMUs) to properly identify stakeholders and establish and maintain a constructive relationship with them, particularly those affected by the Project.

ii. Assess the level of stakeholder interest and buy-in and enable their views to be considered in the design of the Project and its environmental and social performance.

iii. Encourage the effective engagement of all parties affected by the Project throughout its lifetime on issues that may affect them and provide the means to do so.

iv. Ensure that stakeholders receive timely, understandable, accessible, and appropriate information on the environmental and social risks and impacts of the Project.

9.2. Strategy for Outreach and Information Disclosure

The SEPs shall describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups. Methods used may vary according to target audience. The selection of disclosure—both for notification and providing information—should be based on how most people in the vicinity of the Project routinely get information and may include a more central information source for national interest.

A variety of methods of communication should be used to reach most stakeholders. The project should select those that are most appropriate and have a clear rationale for their choices. The plan should include a statement welcoming comments on the proposed engagement plan and suggestions for improvement. For remote stakeholders, it may be necessary to provide for an additional newspaper outlet or separate meeting, or additional documents that should be placed in the public domain. The public domain includes:

      • Newspapers, posters, radio, television.

- Information centers and exhibitions or other visual displays.
- Brochures, leaflets, posters, nontechnical summary documents and reports.
- Official correspondence, meetings.
- Website, social media.

The implementing entity will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance. The website will also provide information about the grievance mechanism for the project. The communication material shall be in substance, content and information range adapted to respond adequately to the following questions:
- the relevant phase of the project,
- which stakeholder or group of stakeholders are targeted,
- type of information to be shared,
- feedback requirements influencing the project design and architecture,
- is immediate action to be taken,
- adverse social and environmental impacts.

The SEPs shall propose an Information Disclosure Strategy consider the specific needs of stakeholder as well as: Project stage, List of information to be disclosed, Methods proposed, Locations/date, Target Stakeholders, Percentage reached, Responsibilities.

9.3. Strategy for Consultation

9.3.1. Consultation during project preparation

Between January and July 2022, in partnership with the Pacific Islands Forum Secretariat (PIFS), the World Bank Group (WBG) conducted consultations with 11 Pacific Islands Forum (PIF) members on a proposed Regional Trade Facilitation Strategy for the Pacific region. PIF members attended these consultations include Cook Islands, Federated States of Micronesia, Fiji, French Polynesia, Niue, Vanuatu, Tuvalu, Solomon Islands, Tonga, New Caledonia, and Samoa. These consultations followed by a 3-day virtual workshop attended by representatives of PIF member countries, associate members and observer governments members at which PIFS/WBG representatives introduced the regional strategy concept and proposed specific regional actions to support PIF members in their implementation of trade facilitation measures. In parallel with the consultations, the WBG conducted an online survey to provide PIF members an additional opportunity to provide their views on the proposed regional strategy. PIF members welcomed regional action to support their implementation of trade facilitation reforms at the national level. Generally, all representatives of PIF member countries consulted expressed favorable views of both the initiative to develop a regional strategy and the 21 regional actions proposed for inclusion in the strategy.

Consultations were also carried out during project design and preparation:

Table 2. Consultation during project preparation

Date	Countries	Objective
25-29 Nov, 2024	Solomon Islands	Follow up on development of a single window for trade and the potential to expand digitalization for government to business services in this area.
10-14 Apr, 2025	Tonga	Meetings with Ports Authority in Tonga and the Royco Ports Services Ltd
12-13 May, 2025	Tonga	Technical Mission. The objective of this visit is to (i) understand the current status of international port operation through consultations with key port-related officials and site visit; (ii) assess short- and mid-term investment needs for improving port efficiency, including port equipment and facilities and (iii) identify activities to be included in the TFLIP.
14 May, 2025	Samoa	❖ The consultations in Tonga were conducted with: Ministry of Infrastructure, Port Authority Tonga, and private port operators. ❖ The consultations in Samoa were conducted with: Ministry of Works, Transport and Infrastructure, Samoa Port Authority, and private port operator.
15-16 May, 2025	Fiji	❖ The consultations in Fiji were conducted with: Ministry of Public Enterprises, Fiji Ports Corporation Limited, and Fiji Ports Terminal Limited.
9-11 June, 2025	Vanuatu	Project Preparation Mission. The mission objective is to discuss the design and implementation of the Accelerating Trade Facilitation in the Pacific project. In particular, the mission will focus on the following: (i) Defining the implementation arrangements, including the roles and responsibilities of the Project Management Unit (PMU) and the implementing agencies; (ii) Establishing a timeline for completing project preparation and approval; (iii) Working with implementing agencies to elaborate potential investments to be included in the project scope.
12-13 June, 2025	Fiji	
20-23 June, 2025	Vanuatu	Technical Mission. The objective of this mission is to (i) understand the current status of international port operation through consultations with key port-related officials and site visit; (ii) assess short- and mid-term investment needs for improving port efficiency, including port equipment and facilities and (iii) identify activities to be included in the TFLIP. The consultations will include the Department of Ports and Marine and private cargo handling operator.

9.3.2. Consultation during project implementation

During project implementation, it is advisable to consult periodically to communicate project progress to key stakeholders and obtain feedback from them. In addition, consultations should be organized when there is a request to have meetings or when there are changes in Project

design leading to different or new types of impact. The table below depicts the essence of the Consultation process.

Table 3. Essence of Consultation Process

WHAT	❖ Design alternatives ❖ Impacts (positive and negative, cumulative, intangible, legacy) ❖ Design changes ❖ Mitigation measures ❖ Implementation arrangements
WHO	❖ Project affected people. ❖ Indirectly affected people. ❖ Beneficiaries ❖ Interest groups ❖ NGOs/CSOs (local and international) ❖ Local governments ❖ Institutional stakeholders ❖ Local community ❖ Implementation partners
WHEN	❖ During project design ❖ When impacts are identified (mostly during preparation) and continued during implementation, as agreed during preparation. ❖ Sufficient before project appraisal ❖ Part of preparation of ESF instruments ❖ For projects where designs are not final at the time of project approval, during implementation. ❖ When design changes lead to new impacts (implementation) ❖ For complex projects throughout implementation
WHERE	❖ Close to stakeholders ❖ Transportation if far for vulnerable groups ❖ Safe place ❖ Multiple locations for large projects ❖ All directly affected stakeholders should have an opportunity to attend
HOW	❖ Public hearings ❖ Focus groups. ❖ Individual interview, face-to-face, individual consultations ❖ Household surveys ❖ Electronic consultations ❖ Establish project mechanisms to receive comments and suggestions from stakeholders. ❖ Document and disseminate
WHY	❖ Help to identify opportunities and risks. ❖ Require by WB standards / countries regulations. ❖ Improve project design and implementation.

	❖ Increase project ownership and sustainability
FOLLOW UP	❖ Document and disseminate results to stakeholders. ❖ Reflect results in project document.

The consultations shall follow these principles:
1) Explain objectives of consultations.
2) Manage Expectations.
3) Agree on the agenda.
4) Provide advance information.
5) Provide sufficient time for people to voice their concern – manage time adequately.
6) Use right moderators with skill and accepted by the community.
7) Don't allow a single stakeholder domination.
8) Assess the need for interpretation.
9) Make special efforts to ensure that vulnerable – women, people with reduced mobility – are consulted in settings where they can express their views openly.
10) Conclude the meeting by reiterating how the comments and suggestions received are proposed to be used.

Public consultation plan will follow inclusive, participatory, and transparent principles. An example of public consultation plan matrix is outlined below.

Table 4. Consultation Program/Plan

Target Stakeholders	Engagement Method	Topic of Engagement	Timeframe	Person in charge	Information to disclose

9.3.3. Integrating feedback from consultations

Consultations with stakeholders will be the main mechanism to inform them of the Project and to get their feedback. Participating PMUs will ensure that there are notes of project meetings and incorporation of comments into project documents when applicable. Stakeholders who provide specific suggestions will be followed up with after consultations with feedback on how their comments were considered. For instance, an email, message and/or official letter will be sent after workshops (in person or virtual) on how comments/suggestions were considered.

9.4. Strategy to Incorporate the views of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunities to access information, provide feedback, or submit grievances:

❖ It is advisable to conduct discussions with representatives of the stakeholders identified and with persons knowledgeable about the local, country, and sector contexts. Various types of barriers may influence the capacity of disadvantaged or vulnerable groups to articulate their concerns and priorities about project impacts. These barriers can be linked to socio-political, societal conflict, educational, or practical factors. For example, barriers can exist for low-

income households; women; youth; persons with limited mobility; or persons with reduced mobility.

❖ Work with organizations supporting people with reduced mobility to develop messaging and communication strategies to reach them. Special arrangements may need to be made for the transportation of women, the elderly and other vulnerable groups. Elderly and other vulnerable groups may need special assistance in reaching the consultation location.

Some of the strategies that will be adopted to effectively engage and communicate to vulnerable group will be towards:
1. Where literacy levels are low, additional formats such as location sketches, physical models, and film presentations may be useful to communicate relevant information.
2. Assist the public in understanding technical documents, for example by publishing simplified summaries, non-technical background explanations, or access to local experts.
3. Women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate in the engagement teams. Consultations with women and girls should be conducted independently, in safe spaces. As a general matter, focus groups with minors should not be conducted unless there is a specific need to be addressed; advocacy groups working on behalf of minors, and especially girls, should be engaged first before engaging directly with minor girls.
4. People with reduced mobility: provide information in accessible formats, like large print; offer multiple forms of communication, such as text captioning or signed videos, online materials for people who use assistive technology.

10. GRIEVANCE MECHANISM

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a program to be submitted and responded to in a timely manner.

10.1. Country Level Grievance Redress Mechanism (GRM)

In compliance with the World Bank's ESS10 requirement, a specific GBV-SEA/SH grievance mechanism will be set up for the Country level SEP.

The grievance mechanism shall rely on the following principles:

❖ *Principle 1. Proportionality: A mechanism scaled to risk and adverse impact on affected communities.* To assign the risk rating the results of the environmental and social assessment will be used to scale a grievance mechanism to risk and adverse impact on affected communities and decide on the complexity of the grievance features. This will give an understanding on who will be affected and what the impacts on them are likely to be, what the greatest challenges of the Project are.

❖ *Principle 2. Cultural Appropriateness: Designed to take into account culturally appropriate ways of handling community concerns*. To achieve this, projects should: 1) seek input on culturally acceptable ways to address grievances from significantly different groups within affected communities, including different ethnic or cultural groups within the project-affected area; 2) understand cultural attributes, customs, and traditions that may influence or impede their ability to express their grievances, including differences in the social and gender roles and responsibilities of subgroups (especially women) and cultural sensitivities and taboos; and 3) agree on the best way to access grievance mechanisms, taking into consideration the ways communities express and deal with grievances.

❖ *Principle 3. Accessibility and affordability: A clear and understandable mechanism that is accessible to all segments of the affected communities at no cost*. Grievance procedures work only if they present no (or low) barriers to access by communities. Accessibility depends on: 1) clear communication—availability of easy-to-understand information about the grievance process and how the mechanism works; 2) ease of use—simple, convenient, culturally appropriate means for filing complaints, at no cost to complainants (this may involve encouragement and assistance for affected communities to make complaints when problems arise) and 3) continuous support in understanding, raising and formally submitting grievances.

❖ *Principle 4. Transparency and Accountability to All Stakeholders.* The GRM shall demonstrate to the stakeholders: 1) who in the organization is responsible for handling complaints and communicating outcomes, and who is in charge of the mechanism oversight; 2) they will have input into its development; 3) sufficient information on how to access it; and 4) have power to ensure that the process is adhered to by those directly responsible for managing it.

❖ *Principle 5. Voluntarily, Freely and without retaliation: A mechanism that prevents retribution and does not impede access to other remedies*. Grievance awareness building will

encourage stakeholders to share their concerns freely, with the understanding that no retribution will be exacted for participation. The GRM can be triggered in parallel to seeking remedy from formal national authorities. Non-project recourse mechanisms present a reasonable alternative in some circumstance.

❖ ***Principle 6. Survivor centricity and safety, confidentiality, and anonymity***. The survivor-centered approach is a set of five principles that aims to create a supportive environment in which each survivor's rights are respected and in which the person is treated with dignity and respect. The five principles are: 1) confidentiality and informed consent; 2) safety; 3) non-discrimination; 4) respect; 5) access to services.

A GBV sensitive GRM will apply the survivor-centered approach principles by having procedures and measures to deal with such allegations in a safe, timely, and ethical manner. The GRM will determine steps for handling and reviewing this type of allegations for each stage of the process; procedures for review of complaints or incident reports, including information on the investigation and verification process; confidentiality requirements for dealing with cases (e.g., consent and information sharing protocols); internal reporting of allegations, for case accountability. Protocols will include a pathway to refer survivors to appropriate support services and how disciplinary actions are determined for project actors following requirements of local labor legislation, relevant national regulations, as well as mandatory reporting requirements for SEA/SH incidents for adults and children in each country.

10.2. Raising Grievances

The grievance procedure shall be designed to be multiple, accessible, effective, easy, understandable, confidential and without costs to the complainant. Any grievance can be brought to the attention of the GRM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax, or personal delivery to the addresses/numbers to be determined. All grievances can be filled anonymously.

Complaints can be received directly at the Project Management Unit via telephone calls or free SMS (through the project's toll-free number), through social networks (Facebook page, WhatsApp, etc.), the project's website, email (dedicated specifically to receive complaints) where the Project's technical team and the assigned GRM resource(s) will proceed to process complaints.

The subsequent SEPs shall have details on each Grievance entry point, grievance administration processes, timelines, investigation activities, the 2nd tier appeal process for unresolved grievances before referring to legal recourse and closure conditions.

Further details on Grievance admission channels and points shall be publicized in the SEPs and shall be part of the awareness building campaign.

10.3. Grievance Process

A Grievance Redress Mechanism (GRM) must be a simple process whereby stakeholders can submit their complaints free of charge and, if necessary, anonymously or via third parties. It should allow complaints to be submitted in more than one format. The following steps outline

the process that may be followed to resolve a grievance. All grievance forms are contained in Annexes.

STEP 1: Receives and Log Grievance.

Grievances can be submitted orally, in writing via suggestion/complaint box, through free telephone hotline/mobile, mail, SMS, social media (WhatsApp, Viber, Facebook, etc.), email, website, at community levels. The GRM will also allow anonymous grievances to be raised and addressed. The country level SEPs shall include details of Grievance entry points while the interim avenues are available and provided below. Participating PMUs shall appoint dedicated person to lead GRM Process. This SEF refers to this resource as "GRM Focal Point" or "GRM Coordinator".

Recording of grievance, classifying the grievances based on the typology of complaints and the complainants to provide more efficient response, and providing the initial response immediately if possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with reduced mobility, people with language barriers, etc.) and the nature of the complaint.

All grievances shall be logged, recorded and tracked using the Grievance Forms (Annex 1, Annex 2, and Annex 4). The assigned person responsible for GRM (GRM Focal Point or GRM Coordinator) will log, document, and track all grievances received. Grievances shall be assigned a case number, and records of communication/consultation shall all be attached with the relevant entry and filed.

STEP 2: Acknowledging Receipt of a Grievance

The GRM focal point shall acknowledge receipt of any grievances as soon as possible, but up to seven (7) days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected. A Grievance Receipt Form (Annex 3) shall be signed, and a copy provided to the complainant.

STEP 3: Assess and Investigate Grievance

The following steps shall be performed in a timely manner to avoid delaying resolution of a grievance:

1. Obtain as much information as possible from the person who received the complaint, as well as from the complainant to gain a first-hand understanding of the grievance.

2. Undertake a site visit, if required, to clarify the parties and issues involved. Gather the views of other stakeholders, if necessary and identify initial options for settlement that parties have considered.

3. Determine whether the grievance is eligible.
   - Eligible grievances include all those that are directly or indirectly related the project.
   - Ineligible Complaints may include those that are clearly not related to the project or its contractors' activities, whose issues fall outside the scope of the Grievance

Redress Mechanism procedure or where other community procedure would be more appropriate to address the grievance.

4. If the grievance is deemed ineligible it can be rejected however a full explanation as to the reasons for this must be given to the complainant and recorded in the Grievance Database.

5. If the grievance is eligible, determine its severity level using the significance criteria (see an example of significance criteria in Table 5 below). This will help to determine whether the grievance can be resolved immediately or requires further investigation and whether senior management will need to be informed of the grievance.

6. If the grievance concerns physical damage, (e.g. crop, house, community asset) take a photograph of the damage and record the exact location as accurately as possible.

7. Inform the complainant of the expected timeframe for resolution of the grievance.

8. Enter the findings of the investigation in the Grievance Database.

The project team will aim to resolve any grievances within 30 days from the date that it was received. This timeframe can be extended to 60 days for more complex grievances (e.g. level 4 grievances), if required.

Table 5. An Example of Significance Rating Criteria

Significance Level	Type of Grievance	Responsibility
Level 1	A grievance that is isolated or 'one-off' and essentially local in nature and restricted to one complainant. Note: Some one-off grievances may be significant enough to be assessed as a Level 4 grievance e.g. when a national or international law is broken (see Level 4 below)	GRM Focal Point / GRM Coordinator
Level 2	A grievance that extends to the local community or region and has occurred more than once, which is judged to have the potential to cause disruption to the project's operations or to generate negative comment from local media or other local stakeholders	Project Manager (or equivalent)
Level 3	A grievance which is widespread and repeated or has resulted in long term damage and/or has led to negative comment from local media, or is judged to have the potential to generate negative media and local stakeholder comments (e.g. damage to a sacred site or flooding of local school)	Project Manager (or equivalent)
Level 4	A one-off complaint, or one which is widespread or repeated and, in addition, has resulted in a serious breach of project's related policies, country level or International Law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g. failure to pay compensation where appropriate, e.g., resettlement)	Project Manager (or equivalent)

STEP 4: Grievance Resolution.

All grievances shall be dealt with on a case-by-case basis. However, all will require further discussions with complainants and community members that seek to jointly identify and select measures for grievance settlement. This will help to increase ownership of solutions and to mitigate perceptions that resolutions unfairly benefit the project.

- An incident investigation team may be tasked with seeking resolution to the grievance. This may entail a dialog or series of dialogs between affected parties to find a solution to the grievance. Alternatively, it may entail investigating the underlying cause of the grievance and action any changes required to internal systems to prevent a recurrence of a similar grievance.

- An Incident Investigation Report will be completed within 28 days (considered good practice).

- During the 28 days of dialog or investigation, the GRM Focal Point will co-ordinate conflict resolution activities necessary to contain and resolve any actual or potential conflicts arising from the reported grievance. If the case is complex and the stated resolution timeframe cannot be met, an interim response will be provided (oral or written) that informs the stakeholder of the delay, explains the reasons, and offers a revised date for next steps.

- Where possible, grievances will be addressed directly by the project team (lead by the GRM Focal Point or GRM Coordinator). The resolution proposal shall be respectful and

considered, including rationale for the decision and any data used in reaching it. If wider consultation is necessary, grievances will be forwarded to a third party. This third party should be neutral, well-respected, and agreed upon by both Project Team and the affected parties. These may include public defenders, legal advisors, local or international NGOs, or technical experts. In cases where further arbitration is necessary, appropriate government involvement will be requested.

As a last resort, aggrieved parties have a right to take legal action. This is a more formal rights-based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by the arbitrator or courts based on compliance with laws, policies, standards, rules, regulations, procedures, past agreements, or common practice.

STEP 5: Sign-Off on Grievance

- The GRM Focal Point / GRM Coordinator will seek sign-off from the complainant(s) that the grievance has been resolved.

- In instances where the stakeholder is not satisfied with actions taken, the grievance will either:

  1. Be escalated to senior management and a decision will be taken either to implement supplementary actions or to consider initiating an appeal process; OR

  2. The GRM Focal Point will approach a neutral or third party to assist in mediating and resolving the grievance; OR

  3. The GRM Focal Point will approach the host country's judiciary to further address the grievance.

- Following this process, the GRM Focal Point/ GRM Coordinator will again approach the stakeholder to obtain sign-off on actions implemented.

- The staff member who signs off the complaint should have sufficient knowledge about the topic to provide assurance.

- Once sign-off has occurred, this should be recorded in the Grievance Log.

STEP 6: Monitoring and Reporting

The project management will monitor grievances routinely as part of the broader management of the Project. This entails good record keeping of complaints raised throughout the life of the construction and operation of the Project. On receipt of grievances, electronic notification to management must be distributed. Grievance records must be always made available to management.

Monthly internal reports will be compiled by the GRM Focal Point and distributed to the management team. These grievance reports will include:

- The number of grievances logged in the proceeding period by level and type.

- The number of stakeholders that have come back after 30 days stating they are not satisfied with the resolution.

- The number of grievances unresolved after 60 days by level and type.

- The number of grievances resolved between the Project Team and complainant, without accessing legal or third-party mediators, by level and type.

- The number of grievances of the same or similar issue.

- Project team's responses to the concerns raised by the various stakeholders.

- The measures taken to incorporate these responses into project design and implementation.

These reports and other records will be made available for external review if required. An appropriate grievance report should be part of the project team's annual reporting. A hard copy will be located at the project office, and an electronic copy will be made available online.

10.4. Summary of GRM Process

Table 6. Summary of GRM Process

Process	Description	Timeframe
1. Receives and log grievance	❑ How: Email, phone number, address, suggestion/complaint box, Facebook, sub-window in project website, etc. ❑ Who: Responsible for GRM Focal Point / GRM Coordinator) to Receive, log, track grievances ❑ Tool: Grievance Forms (Annex 1, Annex 2 and Annex 4)	1 day
2. Acknowledge Grievance	❑ Acknowledge receipt of any grievances as soon as possible, but up to 7 days from the date it was submitted and shall inform timeframe of response. ❑ Tool: Grievance Receipt Form (Annex 3)	7 days
3. Assess and investigate	❑ Assess and determine whether grievance is eligible or not eligible (clearly not related to project or its contractor's activities). Non-eligible: can be rejected with full explanation to the complainants and recorded in the logbook. ❑ Assign grievances category (Table 4). ❑ Consult with relevant parties. ❑ May require site visits. ❑ Enter the findings of investigation in the logbook.	7 days
4. Grievances resolution	❑ Identify further actions. ❑ Response provided to complainant, indicate more time if needed. ❑ Method: dialogs, Incident Investigation Report, if wider consultation is needed engage third party, last resort through courts/legal.	28 days (after receipt of grievance)
5. Sign-off	❑ Confirm to the complainant that grievance can be signed off. ❑ If cannot be signed off: return to step #2 ❑ Record in the logbook	
6. Monitoring and Reporting	❑ Monitor grievances routine. ❑ Regular reports:	

11. Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) Complaints

With respect to complaints relating to sexual exploitation or abuse (SEA) and sexual harassment (SH), because of the risk of stigma, reprisals and rejection that can be associated, it is very important for GM to put in place specific procedures that can ensure grievances are registered, recorded, and handled in a safe, anonymous, and confidential manner. These procedures need to balance the need to be survivor-centered while ensuring due process by considering the alleged perpetrators' rights to privacy and presumption of innocence. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's consent.

The SEPs will propose measures to prevent and response to risks of GBV/SEA/SH, including an Accountability and Response Framework and a Referral Pathway. The Accountability and Response Framework and the Referral Pathway will detail how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the codes of conduct (CoC) by workers. The Accountability and Response Framework should include at a minimum:

- How allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process.
- Procedures to report SEA/SH allegations internally for case accountability.
- A referral pathway to refer survivors to appropriate support services; and
- Procedures that clearly lay out confidentiality requirements for dealing with cases.
- A redress mechanism

For SEA/SH, the GRM should primarily serve to: (i) refer complainants to the GBV service provider, and (ii) record resolution of the complaint.

11.1. Definitions

The following terms are defined as:
- **Sexual exploitation** is understood as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).
- **Sexual abuse** is understood as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).
- **Sexual harassment (SH**) is understood as any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.
- **Whistle blower:** The International Labour Organization (ILO) defines it as "the reporting by employees or former employees of illegal, irregular, dangerous or unethical practices by employers."

- **Gender based violence** is violence directed against a person because of that person's gender or violence that affects persons of a particular gender disproportionately.

11.2. SEA/SH Procedure

When a SEA or SH type grievance is submitted, measures set out in the Accountability and Response Framework should be applied and GBV focal point in the GRM at the project level who is trained in managing SEA and SH type grievances should handle the complaint.

It is therefore essential that prior to SEA/SH complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, confirmation that the survivor has received support, and that sanctions have been enacted, etc. If projects are unable to train or hire a GBV focal point, they should at minimum train persons in the complaint uptake channels on how to record complaints appropriately and confidentially.

When the complaint is received, Grievance Process should be adapted to ensure the following:
1. Confidentiality of Information: Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security. No identifiable information on the survivor should be stored in the GRM database. The GRM should not ask for, or record, information on more than the following related to the SEA/SH allegation:
    - The nature of the complaint (what the complainant says in her/his own words without direct questioning).
    - If, to the best of the survivor's knowledge, the perpetrator was associated with the project.
    - If possible, the age and sex of the survivor.
    - If possible, information on whether the survivor was referred to services.
2. After recording the above information, the complaint should be referred to the GBV focal point should provide survivors with immediate information regarding options for reporting and responding including referral to existing GBV service providers.9 No attempt should be made by GBV focal point to investigate the complaint. It is to be accepted and immediate referral should be provided to GBV service providers.
3. The GRM should have in place processes to immediately notify both the Implementing Agency (IA) and the World Bank of any SEA/SH complaints, with the consent of the survivor. For World Bank reporting protocol refer to the Environmental and Social Incident Response Toolkit (ESIRT).
4. The decision of reporting to the GRM and whether or not to access services should be at the discretion of the survivor based on the information provided. Thus, if the survivor simply wants to access services and not file a formal complaint, this should also be accepted. The GM should serve primarily to refer complainants to GBV service providers (whether related to the project or not) immediately after receiving a complaint. In addition, survivors should be informed of any mandatory reporting requirement and limits of confidentiality based on the country's legislation.
5. When determining GBV service providers, considerations should be given to organizations that can provide support to: (i) health; (ii) psychosocial; and (iii) legal support. Services should follow global standards and guidelines.

6. Any survivor reporting GBV through a reporting mechanism in a World Bank Investment Project Financing (IPF) should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because often, the specifics of the perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care. SEA/SH allegations shall be handled within 24h from the reception of the grievance. Where the complainant consents, the GRM should initiate procedures to determine whether disciplinary measures should be implemented, as set out in the Accountability and Response Framework.

11.3. Processing, Resolving and Closure of Grievance

Processing, Resolving and Closure of Grievance should be adapted in the case of SEA/SH type grievances keeping in mind the following:

1. As described earlier, when a complaint is received, it is registered in the project GRM and referred to the GBV focal point at the project level and subsequently to the relevant GBV service provider with the consent of the complainant. The service provider initiates accountability proceedings with the survivor's consent. If the survivor does not wish to place an official complaint with the employer, the complaint is closed. When the survivor proceeds with the complaint, the case is reviewed through the established SEA/SH resolution mechanism that will be developed at the project level and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the codes of conduct. Within the established SEA/SH resolution mechanism, it is confirmed that the action is appropriate, and the GRM is then informed that the case is closed.

2. With regard to the support given to the survivor by the GBV service provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.

3. All SEA/SH survivors who come forward before the project's closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If a project is likely to close with SEA/SH cases still open, prior to closing the project appropriate arrangements should be made with the GBV service provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the Borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.

4. For SEA/SH allegations, the Accountability and Response Framework will detail how these allegations are handled (administrative investigation procedures) and how disciplinary actions for violation of the required behaviors are determined. Some SEA/SH allegations may be referred to local or national authorities for the purposes of criminal investigation,

in accordance with the wishes of the survivor or in compliance with mandatory reporting requirements in the relevant jurisdiction. To address security, retaliation, and safety of survivors, the project and the GBV service providers will ensure confidential handling of all data and information relating to survivors, and confidentiality in all processes leading to support for survivors and the resolution of each case.

12. World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

Annex 1. Grievance Log Form

Grievance / Incident Reference Number: (To be assigned by the receiving office / GRM coordinator / GRM Focal Point)		
1	Name (The complainant should feel free to remain anonymous)	Name/s Complainants: I wish my identity not to be disclosed: ❑ Yes ❑ No My identify should not be disclosed without my consent: ❑ Yes ❑ No
2	Contact information (Specify how you would like to be contacted and provide details)	Contact me by: Telephone: …………………….. Email: ……………………………… Physical Address: ……………. Others: ……………………………
3	Preferred language for communication	
4	Description of grievance or incident	What is the issue: Where did it happen: When did it happen: How did it happen: Who caused it: What was the impact/outcome:
5	Frequency of incident	One off? ❑ Yes. Please describe ……… ❑ No. Please specify ………….
6	What would you like to happen to resolve grievance?	
Signature: **Date:** **Sent by:**		
Grievance resolution status:		

Annex 2. Grievance Record Form

Grievance/Incident Reference number: Date Submitted: Target date for resolution:	
Name:	
Address and contact details:	
Grievance received by:	
Name of Grievance Focal Point / Coordinator:	
Description of Grievance	
Assessment of Grievance Level:	Level: Notification to senior management? ❑ Yes ❑ No
Actions to Resolve Grievance	
Delegation to:	
Action(s)	Who: When: Completed: ❑ Yes. Date of completion: ❑ No
Response / Resolution:	
Strategy to communicate response:	
Sign-off:	
Date:	
Conclusion	
Is complainant satisfied?	❑ Yes ❑ No Comments from Grievance Focal Point / Coordinator:
Grievance closed?	❑ Yes ❑ No If No, Grievance resubmitted? ❑ Yes ❑ No

Annex 3. Grievance Receipt Form

Grievance/Incident Reference number: Date Submitted: Target date for initial meeting to address grievance:	
Name:	
Address and contact details	
Grievance received by:	
Name of Grievance Focal Point / Coordinator:	
Contact details of grievance coordinator:	Phone: Email: Address:

Annex 4. Grievance Tracker Form

Ref No	Date	Recipient	Complainant	Description of Grievance	Priority	Step (1-6)	Action	Responsible for resolution	Status (Open/Closed)	Findings	Resolution	Date of Close out	Additional Comments / Follow up

Annex 5. Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

13.3. Example of an SEP Budget Table

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
1. Estimated Staff salaries* and related expenses					
1a. *E.g., Communications consultant*					
1b. *E.g., Travel costs for staff*					
1c. *E.g., Estimated salaries for Community Liaison Officers*					
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. *E.g., Project launch meetings*					
2b. *E.g., Organization of focus groups*					
3. Communication campaigns					
3a. *E.g., Posters, flyers*					
3b. *E.g., Social media campaign*					
4. Trainings					
4a. *E.g., Training on social/environmental issues for PIU and contractor staff*					
4b. *E.g., Training on Gender-Based Violence (GBV) for PIU and contractor staff*					
5. Beneficiary surveys					
5a. *E.g., Mid-project perception survey*					
5b. *E.g., End-of-project perception survey*					
6. Grievance Mechanism					
6a. *E.g., Training of GM committees*					
6b. *E.g., Suggestion boxes in villages*					
6c. *E.g., GM communication materials*					
6d. *E.g., Grievance investigations/site visits*					
6e. *E.g., GM Information System (setting up or maintenance)*					
6f. *Other GM Logistical Costs*					
7. Other expenses					
7a. …					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

14.4. Example of the Monitoring and Reporting Table (SEP level)

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	• Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved?	• Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of SEA/SH cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	Records from the implementing agency and other relevant agencies
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation ?	• Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle?	• Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation	Stakeholder Consultation Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results

		received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	
Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	• Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?	• Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion, and effectiveness.	Communication Strategy (Consultation Schedule) Periodic Focus Group Discussions Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives