

Republic of Iraq



**Ministry of construction, housing, municipalities &
public works**

ROADS AND BRIDGES DIRECTORATE

ROAD MAINTENANCE MICROENTERPRISES GRANT PROJECT

Republic of Iraq

Stakeholder Engagement Plan (SEP)

Prepared by RBD/PMT/E&S Unit

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ABBREVIATIONS AND ACRONYMS

CDD	Community-Driven Development
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMG	Environmental and Social Management Guide
ESS	Environmental and Social Standard
GDP	Gross Domestic Product
GDRB	General Directorate for Roads and Bridges
GoI	Government of Iraq
GRS	Grievance Redress Service
M&E	Monitoring and Evaluation
MENA	Middle East and North Africa
MOCHMPW	Ministry of Construction, Housing, Municipalities and Public Works
MOCH	Ministry of Construction and Housing
MOE	Ministry of Environment
MOF	Ministry of Finance
MOP	Ministry of Planning
MOT	Ministry of Transport
OHS	Operational Health and Safety
PDO	Project Development Objective
POM	Project Operations Manual
RBD	Roads and Bridges Directorate
SEP	Stakeholders Engagement Plan
UNDP	United Nations Development Programme
UNIDO	United Nations Industrial Development Organization
WBG	World Bank Group
WB	World bank

1. Introduction and Project Description

1.1 Project description

The Government of Iraq (GoI) has launched, with the support of the World Bank (WB), the preparation of a rural road maintenance project that aims to provide opportunities to improve the livelihoods of poor rural people and to maintain the level of access to rural roads in the pilot regions of Diwaniyah, Najaf, Karbala, Diyala, Salah ad Din, Nineveh, Samawah and Duhok. The Ministry of Construction, Housing, Municipalities and Public Works, responsible for the overall implementation of the project overseeing the two implementing agencies (a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) and General Directorate for Roads and Bridges in GDRB in Erbil, who will be responsible to implement specific sub components of the project. RBD will be responsible for the design, procurement, FM and social and environmental safeguards of the road network maintenance in all Governorates except KRG region , while the GDRB will be responsible for design, procurement, FM and social and environmental safeguards of the road network maintenance in the KRG region.

Component 1: Rural roads maintenance subprojects

Sub-component 1.1: Labor-intensive rural roads maintenance works

The sub-component will provide financing for labor-intensive rural roads maintenance subprojects to be implemented within the Project Area by microenterprises (to be defined more precisely for the context of Iraq during project preparation). Road maintenance

Microenterprises have been found to be one of the best ways to carry out labor-intensive preventive road maintenance works. They contribute to improved road accessibility for rural citizens, create or revive local contracting industries, lead to job creation and poverty reduction, and help improve the relationship between the State and citizens, which usually results in increased socio-political stability. The subprojects will consist of preventive maintenance works of roads and road-related infrastructure, specifically debris removal, cleaning of shoulders, drainage system and bridges, vegetation control, slopes and retaining walls, installation of simple protection measures, and/or minor surface repairs. The works will also include emergency works to repair any substantial damages which are caused directly by unforeseen natural phenomena with imponderable consequences occurring either around roads or elsewhere, but with a direct impact on the roads, as well as by traffic accidents.

The project will not include road extension nor new road construction. Winter maintenance of rural roads will be tested in the relevant areas of Iraq, including winter inspection, salt or sand spreading on paved sections to facilitate vehicle adherence, and snow removal. To maximize opportunities for the employment of local labor (versus machines) and resources, mainly work shall be manually executed using tools, protective equipment, and small quantities of construction materials that are necessary for the works. The selected microenterprises will have to predominantly employ the disadvantaged rural labor force available from the beneficiary communities. Use of local labor would increase non-farm rural incomes during periods of reduced agriculture activity, notably between April and September, which is the dry season when most of the works will be carried out. Targeted road sections, both classified and unclassified, paved and unpaved, of 10 to 30 kilometers each per subproject situated in the Project Area,

have been pre-identified during preparation in cooperation with the recipient and implementing agencies based on expected benefits that the community will derive from the maintained road access (for instance, ensuring access to markets and/or critical services such as health centers and/or schools).

Sub-component 1.2: Technical inspection of works

This sub-component will finance consulting services for field technical inspections of road maintenance subprojects for independent quality control purposes to complement the implementing agencies and local stakeholders in ensuring that the preventive maintenance works are executed in accordance with internationally recognized best practices, including in terms of management of social and environmental matters and risks associated with the civil works of the project.

- **Component 2: Capacity building**

Sub-component 2.1: Trainings on technical aspects

This sub-component will finance, through the provision of consulting services, capacity building activities in the form of technical assistance and hand-on trainings for staff of implementing agencies and stakeholders at the governorate and local level to enable them to properly supervise and support/manage the maintenance activities of the project. The topics covered will include, inter alia, (i) efficient decentralized road asset management, including road selection for investments, (ii) performance-based road maintenance contracting, supervision and inspection, and (iii) proper execution of road maintenance works.

Sub-component 2.2: Trainings on entrepreneurial and managerial aspects

This sub-component finances, through the provision of consulting services, capacity building activities in the form of hand-on trainings for key beneficiaries to improve the sustainability of the road maintenance modality financed by the project and the local entities involved. This training would cover the following topics: (i) proper formation and organization of microenterprises (including the registration of the relevant legal administrative entity), (ii) entrepreneurial skills including general management skills (administrative, strategy, planning, marketing, financial management, project management, and time management) and soft skills (leadership, motivation, delegation, communication, and negotiation) to improve their performance and ensure their sustainability, and (iii) access to finance to introduce potential beneficiaries and/or familiarize them with the different options in terms of inclusive finance mechanisms, particularly microfinance ones. This would improve the proficiency of the beneficiaries in this process (including the required documentation) and therefore maximize their potential access to new lines of formal credit from these institutions to develop and sustain their income-generating schemes. The duration, intensity and teaching delivery mechanisms will be tailored to respond to the specific needs of beneficiaries.

- **Component 3: Project management and administration (PMA), monitoring and evaluation (M&E), and knowledge dissemination**

Sub-component 3.1: Project management and administration

This sub-component finances, through the provision of goods, consulting and non-consulting services, as follows: (i) project management costs, (ii) project audit costs, and (iii) project operating costs .

Sub-component 3.2: Monitoring and evaluation

This sub-component finances, through the provision of consultant services, M&E activities for the project, including third party monitoring to offset the difficulties in access by the World Bank's staff and provide a good level of project oversight.

Sub-component 3.3: Knowledge dissemination

This sub-component finances, through the provision of non-consulting services, knowledge dissemination activities to share lessons of this project and raise awareness about this initiative within central, regional and local levels of government as well as local communities and civil society to increase likelihood of replicability and scalability of this concept.

1.2 Summary of Screening of Environmental and Social Risks and Impacts

The proposed project has **moderate risk**. Activities of the sub-projects are likely to generate site specific environmental impacts during works related essentially to the management of waste, noise, wastewater, borrow pits and disposal of some hazardous materials. These impacts are **easily remediable and can be easily mitigated**. Maintenance works will be carried out on the roads' existing right-of-way, the project does not therefor involve land acquisition leading to involuntary resettlement or restrictions of access to resources or livelihoods, nor are there indigenous peoples at the project sites. However, given that local microenterprises involving rural inhabitants will implement preventive maintenance works, there is a potential risk related to child and forced labor . The risk of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) especially related to activities under component 1 of the project where females maybe at greater risk of SEA/SH. The result of the GBV screening tool indicated that various aspect of the program bring the GBV risk to " low" risk rating considering the fact that labor influx is very limited due to the low number of workers (around 20 per sub-project) and the fact that all labor will be sourced from the local communities. Particular attention to these areas of risks were therefore necessary, and mitigation measures have been included in the project ESMF.

2. Regulations and requirements

2.1 National Requirements

The project is subject to Law No.2 of 2009 (which aims to protect and improve the environment and natural resources) and Law no. 27 of 2009 on the Protection and Improvement of the Environment (which requires projects to conduct an Environmental Impact Assessment (EIA). However, the law does not include a social assessment requirement nor stakeholder consultation, public participation or disclosure.

2.2 World Bank Requirements

The World Bank's ESF's Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).
- A SEP proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99)
- According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

In order to satisfy the above requirements, consultations will be conducted prior to project implementation covering all sub-project sites and targeted communities. Consultations will continue throughout project implementation and results will be included within the environmental and social monthly reports. Engagement activities with the community and users of the roads will be conducted by the environmental, social health safety specialist appointed at the RBD in Baghdad and GDRB in Erbil and the environmental, social focal points at each of the eight governorates. From experience in previous

projects, most effective consultations means were found to be face-to-face meetings over a survey questionnaire. Each consultation session will be documented, and the survey questionnaire will be carefully developed, and quality assured as to achieve the objectives of carrying out meaningful consultations and stakeholders will be reported back to where required. A simple yet effective GRM will be adopted, which depends on direct communication with the social and environmental focal points at of each governorate via phone, as this was found the most applicable and widely used means of communication in rural areas. The phone number and contact name of the focal points will be made available to the communities through leaflets and signs at the project sites.

3. Stakeholder Identification and Analysis

Project stakeholders include public and private entities, government officials, civil society and NGOs, directly or indirectly affected by the project. Project stakeholders can be categorized as follows:

- **Project Affected Parties:** persons, groups and other entities within the Project Area of Influence that will be potentially directly influenced by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties:** individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups:** persons who may be disproportionately impacted or further disadvantaged by the sub-projects as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the sub-projects.

3.1 Project Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project during sub-project activities. The following individuals and groups fall within this category:

- **The beneficiaries of the project,** direct beneficiaries of the project will be disadvantaged inhabitants in the Project Area (around 2,000 individuals, including 25 percent of women, divided around 50 subprojects), resulting in the equivalent of a total of 350,000 workdays being directly created. Sub-projects will be conducted in eight governorates: Diwaniyah, Najaf, Karbala, Diyala, Salah ad Din, Nineveh, Samawah and Duhok. Other beneficiaries of the project include the communities that will benefit from the maintained access to the targeted roads; and
- **Road Maintenance Enterprises** participating in the project
- **Suppliers of raw materials, food, PPEs and other project's supplies. Business owners and providers of services, goods and materials within the project area;**
- **Project Affected Persons (PAPs),** including local communities in the vicinity of the sub-projects' activities, such as residents along the roads to be maintained.

3.2 Other Interested Parties

The projects' stakeholders also include parties other than the directly affected. These include:

- Government agencies and ministries, including the Ministry of Construction, Housing, Municipalities and Public Works (MOCHMPW); RBD in Baghdad and General Directorate for Roads and Bridges (GDRB) in Erbil ; Ministry of Finance (MoF); Ministry of Environment (MOE); Ministry of Water; and Ministry of electricity.
- State-owned enterprises (SOEs).
- Donors and development partners and project sponsors (i.e. the World Bank)
- Civil society, NGOs, professional groups and associations; that represent local residents and other local interest groups, and act on their behalf. Also Civil society groups and NGOs on the regional, national and local levels located outside the project's Direct Area of Influence will be invited. The list will include but will not be limited to : Sustainable Development organization; Janan El rahma organisation; Entelaq Development Organisation; Elkheir organisation; Al Salam organisation; and Kenz organisation.
- Government officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities. This includes representtaives from the ministries of water and electricity.
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media , digital/web-based entities, and their associations including but not limited to the Iraqi Media Authority ; and
- Private companies, research institutes, and local universities.

3.3 Disadvantaged / vulnerable individuals or groups

Among the 2,000 individuals targeted, 25 percent will consist of women and to the extent possible the disadvantaged and vulnerable individual or groups, including the poor, the most disadvantaged and excluded, youth-at-risk, and internally displaced persons will be given a priority to work on the project where feasible. An important aspect in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the project.

A person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. may be among the existing causes of vulnerability. Within the areas of influence of the sub-projects, the vulnerable groups may include but are not limited to the following:

- Children
- Informal and precarious workers
- Older persons
- Women and youth
- Persons living with chronic illnesses
- Persons with disabilities

- Rural workers and rural populations

Vulnerable groups within the communities affected will be further identified and confirmed throughout the project preparation, implementation and operation.

3.4 Summary of Project Stakeholder Needs

Stakeholder Group	Identified Party	Key Characteristics	Needs/Issues (i.e. Language and other communication issues)	Preferred Notification and Frequency	Specific Needs
Project Affected Parties					
	The beneficiaries of the project , direct beneficiaries of the project will be disadvantaged inhabitants in the Project Area (around 2,000 individuals, including 25 percent of women, divided around 50 subprojects),	Live close to the sub-projects area Normally work in farming and represent the direct project beneficiaries so they will be contracted by the road maintenance enterprises and will be directly involved in the maintenance work	Arabic ¹ Women will have to be contacted by same gender. Face to face meetings considering social distancing (among other COVID-19 considerations where applicable) were found to be the most effective mean of communication	Face-to-face meetings in their location or at their home, radio/media programs	Off working hours (i.e. outside of working hours)
	Road Maintenance Enterprises participating in the project	They are the project contractors , they will be hired by the borrower to implement the maintenance work for the 50 sub-projects. They will receive capacity building and training on entrepreneurial and managerial aspects under component 2.2	Arabic and Kurdish	Face-to-face meetings, official communication	Off working hours
	Business owners and suppliers of services, goods and materials within the project area	They are the project suppliers. They will be selected and audited according to the	Arabic and Kurdish	Face-to-face meetings, official communication	Official working hours

¹ Arabic or Kurdish

Stakeholder Group	Identified Party	Key Characteristics	Needs/Issues (i.e. Language and other communication issues)	Preferred Notification and Frequency	Specific Needs
		requirements of ESS2 as stated in the project LMP. They will be involved with the project on a daily basis. They are expected to economically benefit from the project.			
	Project Affected Persons (PAPs) , including communities in the vicinity of the sub-projects' activities, such as residents along the roads to be maintained.	Residents and agriculture land owners in the vicinity of the roads, who could be affected by the project's different environmental and social impacts. These will be located mostly in areas of rural nature, with different socioeconomic characteristics, and levels of education.	Arabic, Kurdish Women will have to be contacted separately.	Face-to-face meetings in their location or at their home, radio/media programs	Off working hours
Other Interested Parties					
	Government agencies and ministries	Implement project components and supervise implementation	Arabic and/or English	Virtual meetings, workshops and face-to-face	Official working hours
	Donors and development partners and project sponsors;		English	Emails, virtual meetings, workshops	
	Civil society, NGOs, professional groups and associations	Provide support for the affected communities impacted; may have a role in implementing or monitoring the project	Arabic and/or English	Emails, virtual meetings, workshops and face-to-face	Working hours, flexible
	Mass media	Can relay information or collect users feedback about the project or might hold to account / transparency	Arabic and/or English	Emails, virtual meetings, workshops	Working hours, flexible
	Research institutes, and local universities.		Arabic and/or English	Emails and Surveys	Working hours, flexible
Disadvantaged/ Vulnerable Individuals or Groups					

Stakeholder Group	Identified Party	Key Characteristics	Needs/Issues (i.e. Language and other communication issues)	Preferred Notification and Frequency	Specific Needs
	<ul style="list-style-type: none"> • Children • Informal and precarious workers • Older persons • Women and youth • Persons living with chronic illnesses • Persons with disabilities • Rural workers and rural populations 	Mainly among the affected parties (PAPs; suppliers; enterprises; and project beneficiaries)	<p>Arabic, Kurdish Women will have to be contacted by same gender.</p> <p>Face to face meetings considering social distancing (among other COVID-19 considerations where applicable) were found to be the most effective mean of communication</p>	Face-to-face meeting in their location or at their home, radio/media programs	Flexible Childcare Accessibility

3.5 Brief Summary of Previous Stakeholder Engagement Activities

The first round of project stakeholder consultations has been conducted during the preparation of the project ESMF. Due to COVID-19 restrictions and lockdown existing in different parts of the project’s geographic locations, consultation has been conducted via questionnaires sent to a around 70 individuals representing different stakeholder types in the target governorates. Chapter 6 of the ESMF and its Annexes include the consultation methodology, consultation tools, list and profile of participants, and received response.

4. Stakeholder Engagement Plan

4.1 Purpose and timing of stakeholder engagement plan

This section provides details on stakeholder engagement activities for each specific stakeholder group with relevant information and opportunities to voice their views on topics that matter to them. The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances.

4.2 Proposed strategy for information disclosure

Project details, documents and materials will be widely disseminated through the Governorate Provincial Council and RBD/GDRB websites and notices (in Arabic and Kurdish) in local newspapers and media. The list of entities participating in the project will be published on the websites of the MOCHMPW/MOCH and Governorate Provincial Council , and possibly via the media whenever it is considered appropriate. Due to the current COVID-19 crisis, the project will take the precautionary approach for as long as the risk exists, to minimize the risk of COVID-19 transmission during information disclosure, by disseminating information through digital platform (where available) and traditional means of communications. Table below shows a summary of expected information disclosure activities during the different phases of the project.

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
Preparation	Project document	Websites of different involved agencies; billboards at the entrance of the project sites in an accessible way for neighboring communities; social media pages; governorates; brochures; focus group discussions and one-to-one meetings;	Premises of different entities at the central and local levels, as well as in public places and local councils before project appraisal	Line ministries and agencies involved; beneficiary and affected communities		MOCHMPW/PMTs
	Environmental and social instruments (ESMF, ESIA, RF)					
	Environmental and Social commitment Plan, SEP, Labor Management Procedures					
Implementation	Bidding documents, awarded enterprises	Advertising for bids as per the procurement requirements	According to timetable of the project; quarterly press briefing;	Government entities involved; donors; Road Maintenance Enterprises	All stakeholders involved; larger public	Procurement specialists of the project /Project Management Team (PMTs)
	Subprojects activity details and grievance redress details (channels)	Dissemination of information during review meetings; websites of different involved agencies; billboards at the entrance of the project sites in an accessible way for neighboring communities; social media pages; governorates; brochures; focus group discussions and one-to-one meetings;	According to timetable of the project	Government entities involved; beneficiary and affected communities		Communication and awareness staff /PMT Environmental ,Social specialist

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
	ESF instruments, grievance redress mechanism reports	websites of different involved agencies; billboards at the entrance of the project sites in an accessible way for neighboring communities; social media pages; governorates; brochures; focus group discussions and one-to-one meetings;	According to timetable of the project; dissemination of reports	Government entities involved; beneficiary and affected communities; donors		
	Grievance redress details for workers and codes of conduct	billboards at the entrance of the project sites in an accessible way for neighboring communities; social media pages; governorates; brochures; focus group discussions and one-to-one meetings;	According to timetable of the project	Workers and beneficiary and affected communities		PMTs E&S specialist Environmental, Social focal point at Governorates, Contracted enterprises ESHS supervisors
Monitoring and evaluation	Progress reports	Workshops, press conference; social media pages	Bi-annual progress report	Constituencies of the project; beneficiaries and affected population; larger public	All stakeholders identified; donor community, larger public	Communication and awareness unit; M&E specialists of the Project (PMU, Implementation Units
	Feedback	Workshops, press conference; surveys and citizen feedback mechanism; social media pages	As per the indicators' requirements	beneficiaries and affected population		

4.3 Proposed strategy for consultation

The project will safeguard meaningful, effective and informed stakeholder engagement in the preparation, implementation and operation phases of all sub-projects. The project will apply principles of Free, Prior and Informed Consent in all stakeholders' engagement processes during project design process, and throughout the project cycle. The principle entails the following aspects:

- Free of external manipulation, interference, coercion, and intimidation.
- Inclusive of gender and age representation for community engagements.
- Culturally appropriate in terms of the language used and how decisions are made for all groups including those marginalized and disadvantage groups.
- Prior and timely disclosure of accessible, understandable, relevant and adequate information, including draft documents and plans.

- Empowerment of stakeholders, particularly marginalized groups, and incorporation of all relevant views of affected people and other stakeholders into decision-making processes, such as project goals and design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

A Community liaison officer will be appointed by RBD and GDRB at each of the eight governorates to help organize community meetings/sensitization sessions in the project sites on a quarterly basis throughout the project's lifecycle.

Consultation activities will include but will not be limited to the following:

Participatory approach

During the first year of implementation pre-identified target road sections will be confirmed and prioritized in a participatory manner with community members and civil society on the basis of adequate justification of the benefits that they will derive from the maintained road access. In addition to the selection of works sites, local community will be involved in defining labor selection criteria and potential candidates. Communication will be targeted to local audiences to ensure a sound comprehension of the project (what it can and cannot do), inclusive participation, and discussion on priority works. Implementing agencies will also set up a dedicated toll-free, secured telephone number to collect feedback (praise and complaints) from beneficiaries and their communities.

Public Consultations and Focus Group Discussions

The consultation process will take into account the views of men and women through forums or separate meetings, with particular focus on the most vulnerable individuals and groups. The participants consulted will be informed of how their concerns, questions and proposals will be considered in the project. The public consultation processes will mainly serve the following purposes:

- Involvement of all stakeholder groups, including directly and indirectly affected, as well as interested parties;
- Identification of community priorities for investment projects;
- Information on project and its environmental and social impacts, as well as the proposed mitigation measures;
- Collection of opinions, concerns and suggestions to be considered in all decision-making stages, (design, implementation and operation);
- In depth understanding of local conditions and specificities to increase the success factors of the project;
- Increase transparency of the decision-making process; and
- Prevention of conflicts and complaints through revision of sub-project activities as a result of stakeholder feedback.

To ensure a proper preparation and organization of the public consultation and a judicious utilization of its conclusions, the organizer of the consultation (sponsor of the sub-project, the implementing enterprise) will take the following steps

- Participants will be well identified and represent all stakeholders indicated in this SEP;
- Date and place of the consultation will be specified, specific dates cannot be specified at this stage and will be added at a later stage. With regards to the locations, it is planned to conduct one public consultation session per governorate where possible in light of COVID-19 considerations. However, as further detailed below, the most effective mean of communication with the affected communities in the rural areas will be one-to-one interviews based on a survey questionnaire in local language, which will be also communicated orally to ensure an accurate and reliable response.
- A summary of the agenda (a sample agenda is included in Annex 8.1) will be prepared for the participants in an easy understandable manner (non-technical and with official or commonly used language);
- A non-technical summary of the activities to be undertaken will be made available to the public (on a website and in places accessible to citizens);
- Stakeholder representatives will be invited individually through written invitations indicating program and content of consultation (agenda, summary, date, locations, etc.), at least one week before the date of the consultation;
- A notice will be broadcast in the most used information channels in the targeted region (print, radio, display, ads, internet, etc...) to inform the public of the public consultation and invite them to participate.
- Participants will be registered before the start of the session (blank lists will be available, with columns for writing their first and last names, entities they represent, function, contact details, signature);
- The presentation will entail objectives, justifications, consistency, beneficiaries, activities, cost of the sub-project in the official language, as well as of the potential risks and environmental and social impacts, of measures required to mitigate negative impacts and strengthen the benefits, and of the Grievance Redress Mechanism (GRM);
- The questions, opinions, suggestions and concerns expressed by the participants as well as the answers to each question; the details of the measures will be collected and recorded, in order to be taken into account during the sub-project preparation, implementation or operation;
- Participants will be informed on the availability of necessary documents to the participants and the public (date, place, websites, etc.).

Based on experience with previous similar projects and in light of COVI-19 considerations and the rural nature of the affected communities, the public consultation session could be substituted by a number of focus group discussions with different stakeholders, one-to-one interviews with affected communities based on a simple survey questionnaire.

Mass/social media communication

The PMT Communication Specialist will arrange for project information to be posted on the Facebook page in MOCHMPW, and the two implementing partners RBD in Baghdad and GDRB in Erbil, and will communicate with the local population via social media campaigns or tools like WhatsApp throughout the

project's lifecycle. Social media channels will be used as much as possible to disseminate information as rates of social media use (especially Facebook) appear to be high across users of different age and background in project affected communities.

Communication materials

Where feasible, written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. The MOCHMPW, RBD and GDRB will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's technical aspects including environmental and social performance both in English, Arabic, and Kurdish. The website will also provide information about the grievance mechanism for the project (please refer to Section 7).

Project tours for media, local representatives

At appropriate points during the implementation phase, site visits will be organized for selected stakeholders from media organizations or civil society.

Project perception survey

In addition to the citizen engagement, it is proposed to conduct a perception survey once around the mid-implementation phase, and once towards the end of the project's implementation.

COVID-19 considerations

When planning for the public consultations and/or focus group discussions, the project will take the precautionary approach for as long as the risk of COVID-19 exists, to minimize the risk of virus transmission during the consultation processes. This could be achieved by using virtual meetings; sending presentations and questionnaires and remotely collecting feedback.

4.4 Phasing and Timelines

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment. The table below shows an initial timeline for conducting the consultations during the project phases. Table 3 outline a tentative plan for Stakeholder Engagement Activities, the topics to be discussed, the methods to be applied, the location and frequency, and the responsible institutions. Table below shows a summary of expected consultation activities during the different phases of the project.

Project stage	Topic of Consultation	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Preparation	Overall project design, description of activities of the project including working hours – hiring process and addressing specific needs for women	Depending on stakeholders (and COVID-19 status and considerations), the methods will vary between workshops, focus group discussions, public consultations, surveys, and virtual meetings	Premises of different entities at the central and local levels, as well as in public places and local councils	Line ministries and agencies involved; Project affected and other interested parties	MOCHMPW /PMT, RBD and GDRB
	Environmental and social instruments (ESMF/ESMPs)				
	Environmental and Social commitment Plan, SEP, Labor Management Procedures				
Implementation	Consultations on sub-project details, ESF instruments (site-specific ESMPs) and grievance redress details(channels)	Workshops, focus groups, surveys, and public consultations	According to the timetable of the project, close to local locations where the project activities are taking place.	Governmental entities involved; Project affected and other interested parties	MOCHMPW /PMT, RBD, GDRB
	Updated SEP, ESCP, LMP as required		When the documents get updated; at premises of different entities at the central and local levels, as well as in public places and local councils	Governmental entities involved; Line Ministries; and donors	MOCHMPW /PMT
	Training and capacity Building		According to timetable of the project	Governmental entities involved and Road Maintenance Enterprises	MOCHMPW /PMT/Project Consultants, RBD , GDRB
Monitoring and evaluation	Progress reports, identification of roadblocks	Participation to joint monitoring exercises Use of apps or digital solutions for user feedback Surveys Workshops, press conference	Continuous user feedback	Beneficiaries and affected population; larger public	PMT; M&E Specialists; and governorates focal points
	Feedback		Progress review every 6 months; mid-term review and end of project cycle	beneficiaries and affected population	

4.5 Review of Comments

During the public consultations, focus group discussions among other stakeholder engagement activities, stakeholder groups will have the opportunity to provide comments on the instrument/project

design/consultation topic . The PMT will consider these comments and report back to its constituencies. The received comments will be carefully documented in relevant sections of the instrument along with the responses that were offered during the consultations with an indication on how the comments will be considered. Where comments are not considered, solid justification for that will be offered. Efforts will be made to reach out to vulnerable groups, in organizing consultations adapted to their constraints (time, location, translation) to ensure their comments are considered.

5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1 Resources

The project will need to at least one Environmental, Social Health and Safety specialist at the PMT level one Environmental, and a focal points at site-specific levels (at least one environmental, social health and safety focal point for each governorate) and one ESHS supervisor per microenterprise to help supervise and monitor the implementation of the SEP. World Bank staff , where needed, will also provide additional training to the PMT. SEP preparation costs will be secured under the project normal operational costs. The consultation activities will represent most of the preparation costs which consist of : :1- cost of conducting 8 public consultations (one at each governorates), if found possible in light of COVID-19 considerations; and 2- operational cost (related to one-to-one interviews which mainly consist of transportation cost and per-diem for a team of two persons for an average of three days per month. The total budget required for the project consultation activities is estimated at USD 50,000.

5.2 Management Functions and Responsibilities

The Project Management Unit (PMU)

The PMT will be responsible for overseeing and coordinating all activities associated with stakeholder engagement and management. The PMU established at MOCHMPW in coordination with RBD and GDRB will be responsible for the coordination with external stakeholders including other ministries (such as the Ministry of Finance (MoF), Ministry of Planning (MoP), Ministry of Environment (MOE) on specific issues) and representatives of civil society as appropriate.

Social and Environmental Safeguard Specialists

The safeguard specialists at the PMTs (one environmental, social health and safety specialist) and the 8 focal points in the eight governorates (one environmental, social focal point for each governorate) will be responsible for implementing community engagement activities; and will oversee all planned or in process stakeholder engagement activities implemented by the sub-projects. Responsibilities of social and environmental safeguard specialists will include:

- Development, implementation and monitoring of all stakeholder engagement strategies/plans for the Project;
- Overseeing all stakeholder engagement related activities for the Project;
- Management the Grievance Mechanism;
- Identification of stakeholders throughout project cycle, as well as project risks and opportunities.

Monitoring and Evaluation

The M&E Consultant will implement the monitoring and evaluation system, which includes participatory reporting by microenterprises, local authorities, and beneficiaries. The system will be established prior to the start of any subproject by the implementing agencies of the project to ensure continuous follow up and assess the quality and impact of its activities.

6. Grievance Mechanism (GM)

A Grievance Mechanism (GRM) will be developed and operationalized, commensurate with the requirements of the ESS10. This GRM will serve as a channel by which to voice complaints and/or issues raised or faced by beneficiaries and stakeholders. The SEP follows the template/guidelines provided by the WB to prepare and operationalize the GRM.

- A Grievance Redress Mechanism currently in use for EODP bank project implemented by MOCHMPW is being adopted for the project. Currently maintains an online Complaints section, where anyone can send a complaint about any issues pertaining to this project via E-mail with the choice of sending hard copies to the RBD. The emails which will be used for the project will be: eodp.es2015@gmail.com and iodpproject@gamil.com. The existing RBD website will include a section for GRM contacts. In addition, social media pages such as RBD Facebook and Twitter could also be used for complaints. For stakeholders who do not use information technology (IT), a complaint box will be placed at various locations at the subproject sites, including locations easily accessible to the disabled ,elderly and women. The project will further assess the effectiveness of the current systems and establish a GRM that is acceptable and accessible to community members, including multiple channels (including anonymous ones)that are diverse and appropriate to the capacities of different groups of stakeholders including the vulnerable groups in addition to assigning a telephone number for grievance related to GBV. The GRM will also include clear procedures for appeal system. It would serve as the first stop for people who have a grievance and will have several channels for them to complain. They should be informed that they can take the case to the court If need arises.

Below are the procedures to be followed for submitting grievances.

Step 1: Submission of grievances:

Grievance will be submitted using the following channels:

- By completing a written grievance registration form that will be available in the PMTs offices and project sites.
- Submitting the complaint electronically via email or electronic grievance form that will be available at the project's website and project sign boards.
- Submitting a written complaint in the complaint boxes at the PMTs and project sites.
- Telephone and mobile numbers assigned for complaints at the PMTs and project sites.

Where possible it is desirable that complaints are submitted in writing by the complainant. Should the complainant not wish/unable to comply with this request and submit the complaint verbally, then the complainant information and the details of the complaint should be entered in the GRM log.

Step 2: Recording of grievance and providing the initial response:

Once a grievance is received, the designated staff at PMTs will fill it in accurately. All complaints received will be filed in a GRM log. The following information will be registered in the Log:

- Complaint Reference Number
- Date of receipt of complaint
- Name of complainant
- Confirmation that a complaint is acknowledged
- Brief description of Complaint
- Details of internal and external communication
- Action taken: (Including remedies / determinations / result)
- Date of finalization of complaint

Step 3: Investigating the grievance:

The E&S specialist at the PMTs will investigate the grievance by following the steps below:

- Verify the validity of the information and documents enclosed and give the complainant initial confirmation within 3 days of receipt of the complaint.
- Ask the complainant to provide further information if necessary.
- Refer the complaint to the relevant department.
- The relevant department shall investigate the complaint and prepare recommendation to the PMTs of actions to be taken and of any corrective measures to avoid possible reoccurrence.
- The staff shall register the decision and actions taken in the GRM log.

Step 4: Communication of the Response:

The E&S specialist at the PMTs shall notify the complainant of the decision/solution/action immediately either in writing, or by calling or sending the complainant a text message. When providing a response to the complainant, the staff must include the following information: A summary of issues raised in the initial complaint; and Reason for the decision.

- **For eligible and straightforward grievances**, GM staff will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- **For eligible grievances that require further assessment**, GM staff will further engage with the complainant via a phone call or a formal meeting in order to collect further information. Based on this, they will provide, within 14 days from the initial date of receipt of the grievance, actions proposed to resolve the complaint and agreement on the response is sought with the complainant.
- Imminent and serious safety risks reported by the project affected parties will be addressed immediately and will not follow the normal timeline.
- In all the above mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or non-judicial possibilities.

- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within 5 working days. In such case, a second tier should be initiated where the GM staff will attempt to propose alternative options and carry out additional investigation in order to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint. The GM staff should send their response within 7 days from the date of the appeal. The second tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

Step 5: Agreement and Implementation of the Response:

- If the grievance has been resolved, the GM staff will document the actions taken, time it took to resolve the grievance and satisfactory resolution.
- If the grievance has not been resolved, GM staff should document additional information including actions taken, communication with the complainant, and the final decisions made by the complainant with regards to any other alternatives.
- In general, confidentiality should be maintained in GRM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded including time it took to resolve them, as well as the number of unresolved cases.

7. Monitoring and Reporting

7.1 SEP Indicators to be documented in Progress Reports

Table below includes the list of SEP indicators which will be documented in progress reports (non-exhaustive)

ENGAGEMENT WITH PROJECT AFFECTED PARTIES (PAPs)
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
Number, location, attendance and documentation of the meetings held with the governorates and communities or other stakeholders
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the subproject ESMP and/or affected the project design
Minutes of meetings of formal meetings and summary note of informal meetings

ENGAGEMENT WITH OTHER INTERESTED PARTIES
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (national and local authorities, NGOs, civil society, media, academia)
Minutes of meetings
Number and type of project documents publicly disclosed
Number and nature of updates of the Project website
GRIEVANCE REDRESS MECHANISM
Number of grievances received, in total and at the local level, at the PMTs level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, face-to-face)
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been 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.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of local GRM meetings, and outputs of these meetings (minutes of meetings signed by the attendees)

The reporting on Environmental and Social activities will be conducted by the PMTs Environmental and Social specialist in accordance with the requirements of the ESMP, and will include:

a) Quarterly and Annual Reports by the PMUs

During the Project development and implementation phase, the Environmental, Social Development Specialist will prepare brief monthly reports on E&S performance for the PMUs Management which will include an update on implementation of the SEP in terms of SEP indicators. Monthly reports will be used to develop quarterly and annual reports reviewed by senior PMU managers. The quarterly and annual reports will be disclosed on the Project website and made available in the public consultations.

b) Six Monthly E&S Compliance Reports to the World Bank

Six-monthly E&S reports will be prepared and submitted to the WB during the implementation period. A section on stakeholder engagement will be included in these reports which will include an update on implementation of the SEP and include SEP indicators.

c) Involvement of stakeholders in monitoring activities

The project through Sub-component 3 entail:

- (i) the recruitment by the implementing agencies, in accordance with criteria to be set forth in the POM, of a M&E specialist,
- (ii) the preparation of an beneficiary survey (including a baseline study to be undertaken within one year of grant implementation and a mid-term evaluation) that will feed into the implementation completion reports of the project focusing on its outcomes and lessons learned, and
- (iii) Third Party Monitoring Agent (TPMA) to offset the difficulties in access by the World Bank's staff.

The Project will also provide several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. Grievance Resolution Committees at local level will allow PAPs to submit grievances and other types of feedback. Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with the PMT staff, especially local Community Liaison Officers at the governorates level, will allow PAPs and other local stakeholders to be heard and engaged.

d) **Reporting back to stakeholder groups**

8. Annexes

Annex 8.1 – Sample Agenda for the public consultation

- Introduction about the project design, duration, scope of work and activities
- Purpose of the consultation session and future engagement activities
- Present and explain the expected environmental and social impacts for all project phases.
- Present and explain the environmental and social management plan including the mitigation and monitoring measures put in place
- Roles and responsibilities
- GRM and communication channels
- Q & A session