Stakeholder Engagement Plan

Project Number: AIIB P000849 October 2025

Cambodia: National Restoration of Rural Productive Capacity Project - II (NRRPCP-II)

Prepared by the Ministry of Rural Development

ABBREVIATIONS

Abbreviation Definition

AIIB Asian Infrastructure Investment Bank

DOE Department of Environmental

DPWT Department of Public Works and Transport

DRC Dispute Resolution Committee
DRP Detailed Resettlement Plan

EA Executing Agency

EIA Environmental Impact Assessment EMP Environmental Management Plan

ESMP Environmental and Social Management Plan ESMU Environmental and Social Management Unit

FGD Focus Group Discussion

FPIC Free, Prior and Informed Consent
GDR General Department of Resettlement
GRM Grievance Redress Mechanism

HH Household

IA Implementing Agency

ICR Implementation Completion Report

IPP Indigenous Peoples Plan

IRC Inter-Ministerial Resettlement Committee

IRP Income Restoration Program
MEF Ministry of Economy and Finance

MLMUPC Ministry of Land Management, Urban Planning and Construction

MOE Ministry of Environment

MRD Ministry of Rural Development

NCDDS National Committee for Sub-National Democratic Development Secretariat

NGO Non-Governmental Organization
PIU Project Implementation Unit
PMU Project Management Unit

PPM Project-affected People's Mechanism

PSC Project Steering Committee
PWD Persons with Disabilities

RGC Royal Government of Cambodia
RPF Resettlement Policy Framework
SEP Stakeholder Engagement Plan
SIA Social Impact Assessment
SOP Standard Operating Procedures

TA Technical Assistance
ToR Terms of Reference

VCD Village Community Development

WG Working Group

Table of Contents

I.	PROJECT DESCRIPTION	1
	1.1. Overview of the Project	1
•	1.2. Purpose and Objectives of the SEP	1
•	1.3. Regulatory Framework	2
II.	PREVIOUS STAKEHOLDER ENGAGEMENT	3
2	2.1. Summary of Consultation Conducted	3
2	2.2 Key Issues Raised and Responses Provided	4
2	2.3 Lessons Learned for Ongoing Engagement	7
	STAKEHOLDER IDENTIFICATION AND ANALYSIS	
;	3.1 Methodology for Stakeholder Mapping	8
,	3.2. Affected and Interested Stakeholders	9
;	3.3. Vulnerable Groups and Indigenous Peoples	11
;	3.4. Stakeholder Influence and Interest Matrix	13
IV.	STAKEHOLDER ENGAGEMENT PROGRAM	16
4	4.1. Information Disclosure	16
4	4.2. Consultation Activities	17
4	4.3. Reporting Back	20
V.	GREVIENCE REDRESS MECHANISM	22
į	5.1. GRM Structure and Process	22
	5.1.1. GDR-Managed GRM (Land Acquisition and Compensation if any)	
	5.1.2 Project-Level GRMFigure 1: AIIB's PPM Submission and Review Process	
į	5.2. Recording and Reporting	
	. IMPLEMENTATION, MONITORING, AND REPORTING	
(6.1 Roles and Responsibilities	26
Lis	et of Tables	
	ble 1: Summary of Key Issues Raised During Stakeholder Consultations	_
	ble 2: Stakeholder Influence–Interest Matrix	
Та	ble 3: Consultation Schedule	18
	ble 4: Roles and Responsibilities for SEP Implementation st of Figures	26
Fiç	gure 1: AIIB's PPM Submission and Review Process	24

EXECUTIVE SUMMARY Project Description

The National Restoration of Rural Productive Capacity Project - II (NRRPCP-II) is a rural infrastructure initiative implemented by Cambodia's Ministry of Rural Development (MRD), with financing support from the Asian Infrastructure Investment Bank (AIIB). The primary objective of the project is to improve rural connectivity and enhance economic resilience by rehabilitating approximately 412 kilometers of rural roads across ten provinces. These provinces - Kampong Chhnang, Tboung Khmum, Prey Veng, Battambang, Kampong Thom, Takeo, Kandal, Svay Rieng, Kampot, and Kep - were selected based on criteria such as high rural population density, current limitations in road access, and vulnerability to climate shocks. Through improved road infrastructure, the project will facilitate access to essential services such as markets, schools, and health centers, while enabling rural households—particularly farmers, small traders, and women - to engage more actively in the local economy.

The project builds on the momentum and lessons learned from the original NRRPCP by expanding both the geographic and thematic scope. It introduces enhanced measures for inclusive employment generation, aiming to create up to 50,000 short-term local jobs during civil works implementation. At least ten national contractors will be engaged, and labor-intensive construction methods will be emphasized to maximize local economic benefits. With an overall budget of USD 88 million (USD 80 million from AIIB and USD 8 million from the Royal Government of Cambodia), the NRRPCP-II will be implemented over three years through a coordinated institutional structure involving a central Project Management Unit (PMU) and decentralized Provincial Implementation Units (PIUs).

Purpose and Objectives of the SEP

This Stakeholder Engagement Plan (SEP) serves as a guiding framework for systematically identifying, informing, consulting, and involving all relevant stakeholders in the NRRPCP-II. Stakeholder engagement is not only a procedural requirement but is also central to ensuring the project's social acceptability, transparency, and long-term sustainability. Given the diversity of actors affected by or interested in the project - including rural residents, local authorities, Indigenous communities, women-headed households, civil society, and implementing agencies - an inclusive and culturally appropriate engagement approach is critical.

The SEP has four core objectives, each of which plays a pivotal role in advancing good governance, risk management, and participatory development:

First, the SEP aims to identify all relevant stakeholders, both affected and interested, at national, provincial, and community levels. This includes mapping their roles, interests, potential concerns, and levels of influence, in order to tailor communication and consultation strategies to their specific contexts. Special attention is given to vulnerable groups - such as Indigenous Peoples, persons with disabilities, poor households, and returning migrants - who may face barriers to participation and whose voices need to be actively sought out and amplified.

Second, it establishes procedures for meaningful information disclosure and ongoing consultation across all phases of the project cycle. This entails not only providing timely, accurate, and accessible project information to stakeholders in appropriate formats and languages but also ensuring that engagement is two-way. Mechanisms are built into the SEP for community members and other stakeholders to express their views, ask questions, and influence design decisions. For example, feedback received during village consultations can lead to changes in road alignments, drainage features, or work schedules.

Third, the SEP provides for the establishment and operationalization of a grievance redress mechanism (GRM) that enables individuals and groups to raise concerns, lodge complaints, or provide suggestions in a safe and confidential manner. The GRM is structured to be accessible, fair, and responsive, with multiple entry points and clear timelines for resolution. It

ensures that any grievances - whether related to construction impacts, compensation, employment conditions, or social conflicts - are addressed promptly and constructively, thereby reducing the risk of escalation or project delays.

Lastly, the SEP seeks to ensure that stakeholder input is not merely recorded but meaningfully integrated into project design, implementation, and adaptive management. This involves documenting feedback, tracking responses, and regularly reporting back to stakeholders on how their views were taken into account. It also requires systematic monitoring and evaluation of the engagement process itself to assess whether intended stakeholder groups were reached, whether the engagement was effective, and how it can be improved over time.

Ultimately, the SEP under the NRRPCP-II is a living document designed to facilitate continuous dialogue, foster community ownership, and build trust between the project and its stakeholders. It recognizes that successful rural development is rooted in inclusive and transparent processes that give people a real stake in the outcomes that affect their lives.

I. PROJECT DESCRIPTION

1.1. Overview of the Project

- 1. The National Restoration of Rural Productive Capacity Project - II (NRRPCP-II) is a rural infrastructure initiative implemented by Cambodia's Ministry of Rural Development (MRD) with financing from the Asian Infrastructure Investment Bank (AIIB). The project's aim is to improve rural connectivity, strengthen economic resilience, and reduce poverty by rehabilitating approximately 412 kilometres of rural roads across ten provinces. These provinces – Kampong Chhnang, Tboung Khmum, Prey Veng, Battambang, Kampong Thom, Takeo, Kandal, Svay Rieng, Kampot, and Kep – were selected for their high rural populations and limited road access. Upgraded roads (using durable payement and improved drainage) will enhance access to essential services, connecting rural communities to at least 30 markets, 30 health centres, and 70 schools, and facilitating movement of goods and people between rural areas and larger markets. The project is expected to directly benefit about one million rural residents, including marginalized groups such as women, children, unemployed vouth. persons with disabilities, returning migrants, and Indigenous Peoples. A key feature of the project is the creation of short-term employment for an estimated 50,000 local individuals, by prioritizing labor-intensive works and engaging at least ten national contractors with a focus on local capacity development.
- 2. NRRPCP-II builds on the previous project, which provided short-term employment and improved rural infrastructure, and the AF project scales up these efforts. The total project budget is USD 88 million (with USD 80 million financed by AIIB and USD 8 million by the Royal Government of Cambodia), implemented over a three-year period. MRD is the executing agency, overseeing planning, procurement, financial management, and monitoring. A central Project Management Unit (PMU) within MRD coordinates project implementation, supported by Provincial Implementation Units (PIUs) in each target province. International and national consultants are engaged to support feasibility studies, engineering designs, and safeguard document preparation. By project completion (targeted by 2031), the improved rural roads are expected to reduce travel times, lower transport costs, and generally enhance rural livelihoods through better market access and service delivery. Importantly, the project emphasizes inclusive benefits: women, Indigenous communities, and other vulnerable groups are being included in planning and employment opportunities, ensuring they share in the project's positive outcomes.

1.2. Purpose and Objectives of the SEP

- 3. This Stakeholder Engagement Plan (SEP) has been prepared to ensure that stakeholders of the NRRPCP-II are informed and involved in all stages of project design and implementation. It outlines the strategy for open, inclusive, and culturally appropriate engagement with all project stakeholders. The primary purpose of the SEP is to facilitate meaningful two-way communication: to inform stakeholders about the project (its activities, timelines, and potential impacts) and to gather stakeholder feedback for improving project outcomes. In particular, the SEP seeks to establish the role of women, vulnerable groups, and Indigenous Peoples firmly within the consultation process, ensuring their voices are heard and their concerns integrated into project decision-making. By proactively engaging communities, the project also ensures affected people participate in identifying mitigation measures (for example, on road safety, environmental impacts, or livelihood restoration) and in monitoring the project's impacts.
- 4. The objectives of this SEP are to: (i) identify all relevant stakeholders of NRRPCP-AF, including project-affected people and other interested parties; (ii) outline an inclusive plan for information disclosure and consultation that will enable stakeholders to understand the project's risks, impacts, and opportunities; (iii) define mechanisms for stakeholders to provide input, raise concerns, and receive responses throughout the project life-cycle; and (iv) ensure that a functional grievance redress mechanism is in place for timely resolution of issues.

Ultimately, effective stakeholder engagement will support better project design, strengthen social acceptance, and enhance development outcomes. This SEP is considered a living document and will be updated as needed to remain responsive to the evolving context and stakeholder feedback.

5. In line with these objectives, this SEP describes the key stakeholder groups and how they will be engaged, the methods and timing of engagement, the type of project information to be disclosed, and how stakeholder inputs will be incorporated into project decisions. It also details the grievance redress process that stakeholders can access to lodge any complaints or issues. By implementing the activities in this plan, the project will maintain transparency and cultivate a relationship of trust and cooperation with stakeholders from preparation through implementation and operation.

1.3. Regulatory Framework

- 6. Stakeholder engagement under NRRPCP-II will be carried out in compliance with the laws and policies of Cambodia and the Environmental and Social Framework (ESF) of AIIB (2024), as well as in line with international best practices. This ensures that the SEP not only meets AIIB requirements but is also aligned with the country's legal framework for public consultation, land acquisition, and Indigenous Peoples. Key applicable frameworks include:
 - AIIB Environmental and Social Framework (2024): The project adheres to AIIB ESF, which defines the requirements for managing environmental and social risks in Bank-financed projects. In particular, the SEP reflects the principles of meaningful consultation and stakeholder engagement, all stakeholders, especially project-affected people, must be consulted and provided opportunities to participate in project decisions in a manner consistent with AIIB's policies. This SEP has been developed in alignment with AIIB ESF and its Environmental and Social Standards, and it also adheres to the legal and policy requirements of the RGC. In practice, this means the engagement processes will uphold transparency, inclusivity, and cultural appropriateness as mandated by the Bank.
 - National Requirements for Environmental Assessment and Consultation: Cambodian law emphasizes public participation in development projects. The Law on Environmental Protection and Natural Resource Management (1996) and the associated Sub-Decree No. 72 on EIA Process (1999) require that project owners conduct consultations with potentially affected communities during the Environmental Impact Assessment process. Consistent with these laws, NRRPCP-II will disclose information about project impacts and mitigation measures and hold public meetings in project areas as needed, even if specific subproject EIAs may be abbreviated due to project scope. The project will ensure that local authorities and community representatives are involved in discussions of environmental and social assessment findings, thereby satisfying national EIA consultation requirements.
 - Land Acquisition and Resettlement Framework (SOP-LAR): In Cambodia, land acquisition for development projects is governed by the 2010 Expropriation Law and, for externally financed projects, by the Standard Operating Procedures for Land Acquisition and Involuntary Resettlement (SOP-LAR, 2018), SOP-LAR (established via Sub-Decree 22 ANK/BK of Feb 2018) is the RGC's guiding framework for ensuring fair and uniform land acquisition practices in donor-funded projects. Under SOP-LAR, the General Department of Resettlement (GDR) of the Ministry of Economy and Finance is responsible for overseeing all land acquisition and resettlement activities. The NRRPCP-II Resettlement Planning Framework (RPF) has been prepared in line with SOP-LAR and AIIB's standards, ensuring any land acquisition will follow transparent procedures, meaningful consultation with affected persons, prompt compensation at replacement cost, and proper grievance redress. In practical terms, this SEP coordinates with the RPF: should road works require any private land or affect assets, affected households will be consulted by GDR and MRD teams at each stage (from initial notification and survey through compensation agreement and delivery) as per the SOP-LAR process. Voluntary land donation - if any - will strictly follow the protocols in the RPF to ensure donations are truly voluntary, well-documented, and do not severely affect donors' livelihoods.
 - Indigenous Peoples Policy: Cambodia's National Policy on the Development of Indigenous Peoples (NPDIP, 2009) underpins engagement with Indigenous communities. This policy aims

to promote the livelihoods and quality of life of Indigenous Peoples, and emphasizes their rights to participate in development processes and decisions affecting their lands and cultures. It covers ten key sectors (including culture, education, healthcare, environment, land, agriculture, infrastructure, justice, tourism, and industry), reflecting the government's commitment to inclusive development for Indigenous Peoples (often referred to as Khmer Loeu). In line with this, if project activities extend into areas with recognized Indigenous communities, the project will respect provisions of the Land Law (Article 23-28) on Indigenous communal land rights and other relevant regulations (e.g. Sub-Decree No.83 on registration of Indigenous community lands). Moreover, AllB's Environmental and Social Standard 3 (ESS3) on Indigenous Peoples is applicable. The project's Indigenous Peoples Planning Framework (IPPF) ensures that Indigenous communities, if present in project areas, are meaningfully consulted, able to participate in project decision-making, and provided equitable benefits, consistent with both AIIB ESS3 and RGC policy. The IPPF sets forth specific measures for culturally appropriate engagement and benefit-sharing, and commits to obtaining Free, Prior, and Informed Consent (FPIC) in cases where project activities may significantly impact Indigenous Peoples' lands, resources, or cultural heritage. This SEP is closely coordinated with the IPPF - any required Indigenous Peoples Plan (IPP) will include its own consultation strategy, and the project will ensure that Indigenous stakeholders are engaged in their preferred languages and formats, with due respect for their customs.

II. PREVIOUS STAKEHOLDER ENGAGEMENT

2.1. Summary of Consultation Conducted

- Stakeholder engagement for the NRRPCP- AF builds upon the consultation processes 7. conducted during the preparation of the original (previous) project. The first round of consultations was held in mid-2020, when the MRD, together with its consultants, organized a national consultation workshop in Phnom Penh involving key government stakeholders. The objective of the workshop was to introduce the project concept, present the draft Environmental and Social (E&S) instruments - including the Environmental and Social Management Framework (ESMF), Resettlement Planning Framework (RPF), Indigenous Peoples Planning Framework (IPPF), and gather feedback on the proposed safeguard strategies. Participants were briefed on the planned rural road improvements, anticipated social and environmental impacts, and the roles and responsibilities of implementing agencies. Stakeholders emphasized the importance of ensuring road safety near public facilities, controlling construction-related disturbances such as dust and noise, and enhancing inter-agency coordination. Feedback gathered during the session was documented and incorporated into the final design of the project, helping to improve the safeguard instruments and implementation approach.
- 8. During the preparation of the Additional Financing, MRD carried out a second round of consultation workshop with the Provincial Departments of Rural Development (PDRDs) on 19 December 2024 from all ten provinces selected under the AF. These consultations were designed to assess institutional readiness at the provincial level, gather insights from implementation experience under the previous project, and coordinate technical and safeguard planning with subnational stakeholders. PDRD officials shared local-level priorities, reflected on past challenges related to land acquisition and environmental risk management, and highlighted the importance of early and transparent engagement with commune councils and village authorities. Capacity gaps related to safeguard implementation were also discussed, with provinces expressing the need for continued training, technical support, and regular communication with MRD's central project team. These consultations were critical for ensuring that provincial stakeholders were aligned with national safeguard requirements and prepared for their implementation roles under the AF phase.
- 9. The third round of stakeholder engagement involved direct field consultations with community members and local authorities in proposed subproject areas. The MRD Environmental and Social (E&S) team, in coordination with PDRD staff, conducted site visits to approximately 15 rural road subprojects and facilitated community meetings in the

respective villages. In total, 199 individuals participated in these consultations, including 82 women, ensuring meaningful participation and gender balance. The meetings served to inform local communities about the project's scope, design approach, and safeguard commitments, while also providing a platform for villagers to raise their concerns and expectations. Community feedback included strong support for the road improvements, especially in terms of improving access to schools, markets, and health services.

2.2 Key Issues Raised and Responses Provided

- 10. During the above consultations conducted at national, provincial, and community levels, stakeholders raised a variety of suggestions, concerns, and queries related to project design, implementation, and benefit sharing. These consultations played a vital role in shaping the project safeguard frameworks and community engagement strategy. The project team provided comprehensive explanations to clarify technical decisions and safeguard commitments, many of which were reflected in the updated project plans and instruments. Importantly, the team emphasized that the project is designed to avoid land acquisition and resettlement altogether. All road improvements will be confined within existing alignments, and no new land will be acquired ensuring that local people's land, assets, and structures remain unaffected.
- 11. One of the recurring issues raised during consultations was road safety, particularly around public facilities such as schools and markets. Local authorities, including school representatives, expressed concerns about increased vehicle speeds once the roads are improved. They urged the project to incorporate safety features such as speed bumps, signage, and marked crossings. In response, the MRD confirmed that the engineering designs would include road safety enhancements near high-risk areas. Furthermore, a road safety awareness campaign will be launched in affected communes to promote responsible driving and pedestrian behavior. Stakeholders also raised health-related concerns regarding construction-phase impacts—such as dust, noise, and hygiene risks. These were addressed by sharing the project's Environmental and Social Management Plan (ESMP), which mandates measures like dust suppression, noise control near sensitive sites, and contractor obligations on workforce health and safety.
- 12. Community members across several provinces also asked how they could access employment opportunities created by the project, particularly in rural areas where jobs are scarce. In response, MRD explained that the project aims to maximize local hiring, especially for unskilled labor. Contractors will be encouraged to employ local residents, with targets for participation by women and vulnerable groups. The project will also establish a system to announce job openings at the commune level and coordinate with village authorities to identify eligible individuals, including poor households, unemployed youth, and returning migrants. These efforts were appreciated by stakeholders, who stressed that the poorest should benefit from temporary employment opportunities.
- 13. Stakeholders also highlighted the importance of clear coordination and communication between MRD and subnational authorities. Provincial and district officials requested regular updates and clarification of agency responsibilities. In response, MRD explained the implementation structure where PDRDs will function as implementing units (PIUs) and coordinate closely with district offices. Each district will have a focal point to ensure information dissemination to the village level. Coordination meetings at the provincial level and a high-level Project Steering Committee at the national level will further support cross-sectoral alignment. Finally, many stakeholders called for ongoing transparency and communication with communities. MRD committed to a structured "report-back" mechanism: after each consultation, summary flyers will be posted in Khmer at commune offices, and project updates will be shared through commune office and social media to reach those who could not attend meetings. The summary of issues raised, and project responses is presented below in Table 1.

Table 1: Summary of Key Issues Raised During Stakeholder Consultations

Issue Raised by Stakeholders	Project Response
	Several stakeholders, particularly local
	authorities and community members inquired
	whether the road improvement works would
	involve any land acquisition or impact on
	private property, such as fences, home
	extensions, or roadside structures. In response, the project team clearly
	emphasized that the road rehabilitation
	activities under NRRPCP-II are designed to
Land Cancerns (Read Widening)	be implemented entirely within existing
Land Concerns (Road Widening)	alignments. As such, there will be no
	requirement for additional land acquisition or
	removal of private assets. The project avoids
	involuntary resettlement entirely, and no compensation processes are necessary. This
	approach helps ensure that local residents'
	land and property are preserved, and that the
	project remains fully compliant with
	environmental and social safeguard policies
	without triggering resettlement procedures.
	Local authorities, particularly education
	officials and school principals, expressed
	concern about increased traffic speed on
	improved roads, especially near schools and health centers. They requested the inclusion
	of traffic calming features such as speed
	bumps, warning signs, and pedestrian
	crossings to protect vulnerable groups like
	children, the elderly, and people with
	disabilities. In response, the MRD confirmed
Road Safety Near Public Facilities	that road safety measures will be integrated
·	into the engineering design, with specific provisions near schools, markets, health
	centers, and densely populated village areas.
	In addition to physical safety features, MRD
	committed to organizing road safety
	awareness campaigns at the village level in
	coordination with commune councils. These
	campaigns will target both drivers and
	pedestrians to promote safe road usage, contributing to long-term behavioral change
	and accident prevention.
	Health-related risks during construction were
	also raised, especially regarding dust, noise
	pollution, and public health issues associated
	with worker camps or the movement of
	construction workers. Stakeholders were
	particularly concerned about the impact on schoolchildren, elderly residents, and those
ealth and Construction Impacts	with respiratory conditions. In response, the
The state of the s	MRD highlighted the project's Environmental
	and Social Management Plan (ESMP), which
	outlines specific mitigation measures. These
	include regular watering of construction areas
	to suppress dust, limiting noisy activities
	during sensitive hours, and establishing worker codes of conduct to minimize social
	worker codes of conduct to minimize social

Issue Raised by Stakeholders	Project Response
135de Raised by Stakeholders	risks. Contractors will also be required to
	provide hygiene facilities, conduct regular
	health screenings, and deliver awareness
	training on communicable diseases, including
	COVID-19 and HIV/AIDS, to both workers and
	local communities.
	Community members, including youth groups,
	returning migrants, and vulnerable
	households, showed strong interest in
	employment opportunities during road construction. They requested that local labor
	be prioritized, particularly for unskilled work,
	and that employment announcements be
	made transparently at the village or commune
	level. In response, MRD reaffirmed its
	commitment to maximizing local job creation
Local Employment Opportunities	by requiring contractors to hire labor from the
	surrounding communities wherever possible.
	Job advertisements will be posted at commune offices and announced during
	village meetings. Local authorities will assist
	in identifying eligible workers, especially from
	poor households and vulnerable groups,
	including women and returning migrants. The
	project aims to ensure equitable access to
	temporary employment as a means of
	delivering direct socioeconomic benefits to
	rural populations during implementation.
	Provincial and district officials emphasized the need for clear coordination structures and
	information flow between MRD, PDRDs, and
	local administrations. They highlighted past
	challenges in project implementation due to
	limited communication and unclear roles
	between line ministries and subnational
	entities. In response, MRD elaborated on the
	implementation arrangements under
	NRRPCP-AF. PDRDs will serve as Provincial
Coordination with Local Authorities	Implementation Units (PIUs) with dedicated focal points at provincial level. Regular
	coordination meetings will be held with
	relevant departments, such as public works
	and environment, to ensure technical
	alignment. At the national level, a Project
	Steering Committee composed of key
	ministries will oversee implementation and
	facilitate inter-ministerial coordination. These
	arrangements were positively received and are expected to support smoother project
	delivery and monitoring.
	Stakeholders emphasized the importance of
	keeping communities informed throughout the
	project lifecycle. They cited examples from
	previous projects where feedback was
Transparency and Feedback Reporting	collected but need an improvement. In
	response, MRD committed to a robust
	feedback loop as part of the SEP. After each
	consultation, summary notes in Khmer will be
	posted at commune offices and shared via

Issue Raised by Stakeholders	Project Response
	commune office and the MRD website/social media page. These updates will detail the main issues raised, responses provided, and actions taken by the project team. This commitment to ongoing, two-way communication is intended to ensure that stakeholders remain informed, engaged, and confident that their voices are being heard and respected throughout project implementation.

2.3 Lessons Learned for Ongoing Engagement

- 14. From the initial engagement activities, the project has derived several lessons learned that will inform and strengthen the ongoing stakeholder engagement process:
 - Start Engagement Early and Continuously: Early consultations during project preparation
 proved valuable in identifying community priorities and potential concerns before finalizing
 designs. A lesson learned is to continue engaging stakeholders throughout the project cycle,
 not just at the beginning. This SEP provides for regular consultations at key milestones (detailed
 design, before construction, during works, and post-construction) to maintain dialogue. Early
 engagement has built trust; maintaining that trust requires continuity and responsiveness over
 time.
 - Representation and Inclusiveness: It became clear that special efforts are needed to ensure vulnerable groups are represented in consultations. For example, at village meetings, women initially spoke less than men, and some poorer households were hesitant to attend. The team learned to proactively invite women's groups and schedule separate women-focused discussions (with female facilitators) to create a comfortable space for women to voice their opinions. Similarly, reaching out to Indigenous elders or minority language speakers in advance helps their participation. Future engagements will incorporate inclusive facilitation techniques (translation into indigenous languages, choosing times/venues convenient for women and the elderly, etc.) so that the feedback collected represents all segments of the community, not just the most vocal.
 - Clarity and Simplicity in Communication: During earlier consultations, some technical concepts (like "climate-resilient design" or "safeguard frameworks") were not easily understood by local participants. The team learned to communicate in simple, non-technical language and to focus on concrete issues that matter to people (e.g. job opportunities, impact on rice fields, road safety for children). Using visual aids (maps, diagrams of road cross-sections) and local language interpreters was effective. Going forward, materials for disclosure will be made more user-friendly for instance, preparing a one-page project brief in Khmer with graphics. Clear and jargon-free communication helps avoid misunderstandings and allows stakeholders to engage meaningfully.
 - Managing Expectations: Initial engagements raised high expectations among some community members (for example, some expected all rural roads in their area would be fixed). The project team realized the importance of managing expectations by clearly explaining the project scope and limitations. Stakeholders were informed which roads are included, the timeline, and that not all issues (like major new bridges or extensive drainage in every village) could be solved within this project. By being transparent about what the project can and cannot do, the team prevents future frustration. This practice of frank communication will continue, paired with messages about how stakeholders can maximize benefits from the project (such as by participating in maintenance after roads are built).
 - Leveraging Local Structures: Engagement was most successful when it leveraged existing local structures and leaders. Commune and village chiefs played an important role in mobilizing villagers for meetings and mediating discussions. The project learned to work through these structures – for example, asking village chiefs to help identify vulnerable households, or using commune council monthly meetings to provide project updates. This not only lends legitimacy to the process but also helps with sustainability (local authorities will continue to be involved

- after the project). The lesson is to treat local authorities and community-based organizations as partners in engagement, providing them with information and capacity to disseminate it further.
- Flexibility and Adapting to Context: Finally, the project learned that stakeholder engagement must remain flexible and adaptive. For instance, the COVID-19 pandemic initially restricted face-to-face meetings, so the team adapted by using smaller gatherings and phone consultations. In other cases, harvest seasons or local holidays required rescheduling of consultations. The lesson is to adapt the engagement methods to the context whether that means switching to virtual meetings, adjusting schedules, or tailoring methods to literacy levels (using oral presentations instead of documents for communities with low literacy). This flexibility will remain important as the project moves into implementation, ensuring that engagement activities are context-appropriate and effective.
- 15. These lessons learned have been incorporated into this SEP and will guide the project's stakeholder engagement going forward. By learning from past experience, the project aims to continuously improve its consultation approach, building stronger relationships with stakeholders and better outcomes for all parties involved.

III. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology for Stakeholder Mapping

- 16. A systematic stakeholder mapping exercise was conducted to identify all individuals and groups who have an interest in, or could be affected by, the NRRPCP-AF. The methodology involved: (i) reviewing the project components and potential impact areas; (ii) brainstorming with the project team (MRD PMU and consultants) to list parties involved in rural road development in Cambodia; and (iii) consulting local authorities in the target provinces to identify specific community groups, vulnerable populations, and influencers in the community. Stakeholders were broadly categorized into "Project-Affected Parties" and "Other Interested Parties," consistent with international good practice (e.g. World Bank ESS10 terminology). Within these broad categories, further sub-groups were identified (such as directly affected households, local authorities, civil society, etc.), and their interests and influence assessed.
- 17. The project team developed a Stakeholder Register, which lists stakeholders along with key information (their interests in the project, how they might be impacted, and the appropriate engagement strategy for each). Additionally, a preliminary stakeholder influence and interest matrix was prepared to visualize the relative influence and interest levels of different stakeholders. This helps prioritize engagement efforts for example, those with high interest but lower influence (such as vulnerable community members) will need empowerment to ensure their voices are heard, while those with high influence (like government regulators) will be closely consulted to secure support and approvals.
- 18. The mapping also considered geographical scale: stakeholders were identified at the national level (ministries, AIIB, NGOs), provincial level (provincial departments, governors, etc.), district/commune level (local authorities and community organizations), and village level (the directly affected people and beneficiaries). Special attention was given to identifying vulnerable or disadvantaged groups and any Indigenous communities in or near the project areas. The identification process leveraged existing data from the project's Environmental and Social assessments for instance, the IPPF's screening of Indigenous groups in provinces and the RPF's analysis of affected households helped pinpoint key stakeholders that require targeted engagement.
- 19. This stakeholder mapping is not static; it will be updated throughout the project. As subprojects (specific road segments) are selected and go through detailed design, more stakeholders (e.g. specific communities, landowners, contractors) will come into focus. The SEP will be revised accordingly to include new stakeholders or changed dynamics. For example, once contractors are mobilized, they become stakeholders as well (with responsibilities in engagement). The methodology thus is iterative continuing to gather

information on stakeholders via baseline studies, ongoing consultations, and inputs from local facilitators. By following this mapping process, the project ensures that no significantly affected group is overlooked and that engagement activities can be tailored to the characteristics and needs of each stakeholder group identified.

3.2. Affected and Interested Stakeholders

20. The NRRPCP-II involves a variety of stakeholders ranging from local rural communities to national government agencies. Affected Stakeholders are those who are directly impacted (positively or negatively) by the project's activities. Interested Stakeholders are those who have an interest in the project or could influence its outcome, even if they are not directly affected. Below is an overview of the main stakeholder groups in each category:

Project-Affected Parties (PAPs):

- Local Communities in Project Areas: This includes the men, women, and children residing in villages along or near the rural roads to be rehabilitated. They are primary beneficiaries of improved access and employment opportunities, but also the ones who will endure construction nuisance or any land acquisition. Within communities, subgroups such as farmers, small business owners (market vendors, shopkeepers), and public service users (students, patients) are affected in specific ways (e.g. farmers need access to fields during works, shopkeepers may benefit from increased traffic, etc.). Affected communities also include those households who might lose small portions of land or assets due to road widening or drainage improvements these could be roadside residents or farmers with fields adjacent to works. *Indigenous community members* (if present in a given locale) would also be part of local PAPs. All these community members have a high stake in the project's outcomes and will be continuously engaged.
- Vulnerable Groups among PAPs: Within the local communities, certain individuals are more vulnerable to project impacts or may have more difficulty participating in engagement. These include poor households, female-headed households, people with disabilities, the elderly, youth (especially unemployed youth), and returning migrant workers who have come back to villages after losing jobs abroad. These groups are affected parties whose perspectives will be specifically sought out. For instance, returning migrants and jobless youth are targeted as workers in the project their inclusion is a deliberate outcome, and they will be affected by how jobs are allocated and what training is provided. Women in the communities might experience impacts differently (like safety concerns), so they are considered a distinct sub-group of affected stakeholders.
- o Indigenous Peoples (if any are in the project area): Indigenous communities who have a collective attachment to the project area are a critical category of affected stakeholders. In some provinces, small populations of Indigenous Peoples (*Khmer Loeu* groups) may reside in or use areas near the project roads. If confirmed, these communities (and their traditional authorities) are directly affected by any project activities on their lands and stand to benefit from improved access. They may also face unique impacts (e.g. cultural sites along roads). Therefore, Indigenous groups and their leaders are identified as affected stakeholders to be engaged through tailored approaches.
- Project Workers: Though perhaps not traditionally listed, the individuals employed by the project (whether skilled engineers or local laborers) are also stakeholders. Laborers from local communities will be affected parties they benefit via wages and training, but also need to be protected (through fair labor practices and safety measures). Contractor staff, supervisors, and consultants form part of the project's stakeholder environment they have interest in the project's success and will be engaged (for example, through orientation on community interaction and GRM usage). Workers have their own grievance mechanisms but interact with the community and are thus relevant in stakeholder dynamics.

Other Interested Parties

- National Government Ministries and Agencies: Various arms of the Cambodian government have an interest in NRRPCP-AF. Key among them is the MRD itself (the Executing Agency). Within MRD, departments such as the Rural Roads Department. the Community Development Department, and the social and environmental safeguard units are directly involved. Ministry of Economy and Finance (MEF) is interested as the borrower and via the GDR which oversees resettlement - GDR is responsible for ensuring compliance with SOP-LAR and will be engaged in any land acquisition consultations and compensation processes. The Ministry of Public Works and Transport (MPWT), while not an implementer in this project, has an interest given its mandate over the national road network; coordination may be needed where rural roads connect to national roads. Ministry of Environment (MoE) will be interested from an environmental management perspective – ensuring EIA compliance and monitoring of environmental plans. The Ministry of Interior (MoI) (which oversees local administrations) has a stake in how local authorities are involved. Ministry of Women's Affairs and Ministry of Labor and Vocational Training may also take interest, given the gender and employment aspects (ensuring women benefit, labor standards are upheld). These government stakeholders have significant influence and will be continuously kept informed and consulted through inter-ministerial meetings and reporting.
- Offices and Provincial Departments (of Rural Development, Environment, Land Management, etc.) are important interested parties. They will support and monitor project activities in their jurisdictions. District Officials and Commune Councils in the project areas are perhaps among the most influential local stakeholders they connect the project to the community. They are interested because the project contributes to local development (improved roads, jobs) and they often are the first line in addressing community concerns. Village chiefs and elders are included here too. Local authorities are not just intermediaries; they have their own interests (like ensuring the project aligns with local needs, and that any local conflicts are managed). The project will treat them as key partners in engagement.
- Civil Society and NGOs: Various civil society organizations (CSOs) and non-governmental organizations have interest in rural development, infrastructure, and social impacts in Cambodia. For example, road safety organizations (such as the Road Safety Network) are interested in how the project addresses accident risks. NGOs focusing on community development or livelihoods might see opportunities to collaborate or monitor the project's community outcomes. Organizations advocating for Indigenous Peoples' rights or environmental protection will be keen to see that the project respects those aspects (some may have participated in consultations already). CSOs can provide valuable feedback and act as independent observers; the project welcomes their inputs. Their influence can vary some might shape public opinion or offer technical expertise. The project will keep communication channels open with interested NGOs (for instance, by sharing project updates or inviting them to public consultations).
- O Private Sector and Contractors: The private sector has a stake in this project in multiple ways. Construction contractors and engineering firms are directly involved as implementers (once selected). They are interested in clear project requirements and maintaining a good relationship with communities (for smooth work progress). Suppliers of construction materials (like laterite, gravel, bitumen) are indirectly interested stakeholders, as the project will spur local demand for these. Local transport operators (truckers, bus companies) are interested since improved roads affect their business. Additionally, local businesses (shops, markets, agro-enterprises) are interested in better connectivity and the economic stimulus during construction. While these parties are not "affected" in a negative sense, their interest means they may offer support or raise suggestions (e.g. scheduling deliveries during construction, etc.). Engaging contractors in particular is crucial they will be oriented on the SEP and required to interact with stakeholders responsibly.

- Development Partners and Financiers: The Asian Infrastructure Investment Bank (AIIB), as the financier, is a primary interested party. AIIB requires that the project meets its standards (including proper stakeholder engagement) and will monitor the project's environmental and social performance. They have high influence (as the funder) and are regularly informed through progress reports. Additionally, other development partners in Cambodia's rural infrastructure sector (such as the World Bank, Asian Development Bank, or bilateral donors) might be interested in the project's approach and lessons learned, given similar projects in the country. While not directly involved, they form part of the broader stakeholder environment and often coordination with them (through forums or knowledge exchange) is beneficial.
- 21. Overall, affected stakeholders of NRRPCP-II range from rural villagers who will see their roads improved (and possibly their land slightly affected) to workers employed on those roads, whereas interested stakeholders include governmental bodies at all levels, NGOs, and private sector actors connected to rural infrastructure and development. Each group has distinct interests: communities want better access and fair treatment; government wants successful implementation and policy compliance; NGOs want social and environmental safeguards upheld; and contractors want a smooth construction process. Recognizing these interests helps the project tailor engagement approaches for instance, affected local communities will be engaged with face-to-face meetings in local languages, while national agencies may be engaged via formal reports and coordination meetings, and NGOs via information sharing and invitation to observe key consultations. This differentiation is elaborated in the SEP. By identifying all these parties early, the project ensures that no critical voice is ignored and that outreach efforts are appropriately distributed.

3.3. Vulnerable Groups and Indigenous Peoples

- 22. Engaging vulnerable groups is a priority for NRRPCP-AF, as these groups might be disproportionately affected by project impacts or may face barriers to participating in the consultation process. The project has identified the following vulnerable or disadvantaged groups within the stakeholder spectrum, and specific measures will be taken to ensure their meaningful inclusion:
 - Women (including Female-Headed Households): In many rural Cambodian communities, women have distinct perspectives and needs. They often bear responsibilities for household care, accessing markets, and children's safety - all of which intersect with road improvements. Female-headed households (widows, single mothers) may be economically vulnerable and less able to cope with adverse impacts (like losing a bit of land) or to access job opportunities. Women can also be underrepresented in public meetings if not specifically encouraged. The project will address this by holding women-focused consultations (e.g. scheduling separate small group meetings with women in villages, facilitated by female staff) and by coordinating with local women's groups. The SEP emphasizes gender-sensitive engagement: project information will reach women through channels they trust (possibly through health centers or women's NGOs), and feedback from women will be specifically solicited on topics like road safety for children, and any potential risks such as harassment from work crews (so appropriate mitigation can be planned). Additionally, the project's hiring goals include promoting female employment where feasible (e.g. as flaggers, in tree planting along roads, etc.), thereby ensuring women benefit from the project.
 - Poor and Landless Households: Rural poverty remains significant in some target provinces. Poor households or those with very small landholdings are vulnerable to even minor economic disturbances. If a poor family loses a strip of land to road works (even with compensation), it could impact their livelihood. Also, poorer community members might lack access to information or be hesitant to speak in meetings dominated by better-off villagers. To include them, the project will coordinate with commune leaders and CSOs to identify poor households in the project area. Home

visits or small group discussions may be conducted to reach those who cannot come to public meetings (due to work or feeling intimidated). When arranging compensation or assistance, the project (through GDR) will provide additional support to poor/vulnerable affected households as required by the RPF (e.g. top-up assistance, livelihood restoration measures). The GRM will also be designed to be accessible to the poor (with multiple entry points, including local officials or community volunteers who can help lodge complaints on their behalf).

- Unemployed Youth and Returning Migrants: A notable vulnerable group in the project context is the large number of young people (including young men and women) who are unemployed or underemployed, and those migrant workers who returned home, especially during the COVID-19 economic downturn. These individuals are vulnerable economically, and many lack stable income. The project specifically targets them for short-term employment. However, they could be left out if not effectively engaged - for example, if information about jobs doesn't reach them or if they lack certain skills. The SEP will ensure information about job opportunities and training is disseminated in each village (through local radio, commune announcements, and youth networks). Consultations have indicated this group is eager but may need upskilling; hence, the project includes a training program. Returning migrants will be treated with equity and not stigmatized: they may also have valuable skills from abroad that can be tapped. By engaging this group, the project helps reduce their vulnerability, turning them into project beneficiaries. During consultation meetings, care will be taken to hear the voices of youth - possibly by asking some youth representatives to share their experiences or having dedicated focus groups.
- People with Disabilities and Elderly: Persons with disabilities (PWDs) in rural areas face mobility and information access challenges. An improved road can greatly benefit them (better access to clinics or markets), but construction could temporarily impede their movement (if paths are dug up) and they might be overlooked in employment drives. Similarly, elderly persons might have difficulty attending meetings or could feel marginalized by the process. The project will make special efforts to include PWDs and elderly in stakeholder engagement. For example, meeting venues will be chosen for accessibility (ground level, close to the village center). The project team will coordinate with local Disabled People's Organizations (DPOs) or social affairs officials to identify PWDs and consult them directly as needed (even door-to-door for those who cannot travel). Communications will also consider their needs - e.g. providing information in oral form for those who are illiterate, or via family members/caretakers if appropriate. Feedback on specific issues, like the need for road crossings suitable for wheelchairs or slower walking speeds, will be sought. The project's grievance mechanism will also accept complaints via proxy to accommodate those unable to physically lodge them. By proactively reaching out, the project aims to ensure these vulnerable members are not left voiceless.
- Indigenous Peoples: Indigenous communities merit particular attention as a vulnerable group due to distinct cultural and social characteristics and a history of marginalization. As noted, some of the project provinces (e.g. Kampong Thom, possibly Prey Veng or others) have known Indigenous populations or ethnic minority communities living in certain areas. If an Indigenous community is in or near a subproject area, their involvement will follow the guidance of the IPPF. This means the project will conduct culturally appropriate consultations typically starting with engaging Indigenous leaders or councils to explain the project, then arranging community meetings in the local indigenous language (with translators as needed). Traditional decision-making processes will be respected; for instance, allowing time for communities to discuss internally according to their customs before concluding on any project proposals. Indigenous communities might have unique concerns, such as impact on sacred sites (like spirit forests or burial grounds) or communal land use (grazing or shifting).

cultivation areas). These will be carefully assessed via a Social Impact Assessment if required, and Free, Prior, and Informed Consent (FPIC) will be obtained for impacts that are significant as defined by AIIB ESS3 (e.g. if the project needs to use Indigenous land or resources in a way that could affect their identity or cultural heritage). The project will also ensure Indigenous groups benefit: they will be given information on jobs and invited to any capacity-building activities, with adaptation as needed (for example, training materials translated or delivered orally). Recognizing that language can be a barrier, the project will employ interpreters fluent in the relevant indigenous language during all engagements. Any printed materials for them will be translated into Khmer (since many IPs read Khmer) and, where practical, provided in bilingual form with key terms in the local language.

- Other Vulnerable Groups: Depending on the local context, other groups might be identified as vulnerable. For example, in some communities, ethnic minorities who are not indigenous (like Cham Muslims or Vietnamese Cambodians) could be present and socially marginalized. Or very remote communities with limited information access could be considered vulnerable in terms of communication. The stakeholder mapping will remain alert to such groups. If identified, the project will adapt engagement accordingly (e.g. ensuring a Cham interpreter if many Cham speakers are in the area, or using mosque announcements to reach Muslim community members). Another aspect is children while not direct decision-makers, they are vulnerable road users. Schools will be an avenue to reach them (e.g. road safety education programs in schools). Widows or single elderly living alone are also vulnerable; community networks (like pagoda committees or village health volunteers) can help identify and engage them.
- 23. In engaging all these vulnerable groups, the underlying principle is to remove barriers to their participation and to address their specific concerns so that the project does not inadvertently leave them worse off or excluded from benefits. This means adjusting the who, how, when, and where of engagement for these groups. For instance, for vulnerable people who cannot travel, the project will travel to them. For those who cannot speak up in large forums, smaller focus groups or individual interviews will be used. The dimensions of vulnerability (economic, physical, social) have been considered in the SEP design ensuring that information is accessible (through multiple channels and formats), meetings are inclusive (with facilitation that encourages input from shy or disadvantaged persons), and feedback from vulnerable groups is taken seriously in project decision-making. The project monitoring will include indicators on participation of vulnerable groups (e.g. percentage of consultation participants who are women, number of Indigenous community meetings held, etc.) to track how well the engagement is reaching them.

3.4. Stakeholder Influence and Interest Matrix

24. To ensure effective and proportionate engagement throughout the project lifecycle, the NRRPCP-II team conducted a stakeholder mapping exercise based on two key dimensions: the level of influence a stakeholder has over the project and their interest in its outcomes. Influence refers to a stakeholder's power to affect decisions or implementation, while interest refers to the degree to which they are affected by or concerned with the project. The resulting matrix helps categorize stakeholders and determine the most appropriate engagement approach for each group, ensuring no critical party is overlooked.

Table 2: Stakeholder Influence-Interest Matrix

Stakeholder Group	Influence Level	Interest Level	Quadrant Category	Engagement Strategy
Ministry of Rural Development (MRD)	High	High	Manage Closely	As the executing agency, MRD holds significant decision-making authority, budgetary control, and implementation responsibility. It must be engaged continuously through planning meetings, progress reports, and interdepartmental coordination to ensure smooth execution.
General Department of Resettlement (GDR), MEF	High	High	Manage Closely	GDR has legal authority over land acquisition and resettlement matters. Though land acquisition is avoided in this project, GDR's oversight role remains crucial for any safeguard compliance. Regular coordination and updates are essential.
Asian Infrastructure Investment Bank (AIIB)	High	High	Manage Closely	As the project financier, AIIB monitors adherence to its environmental and social standards and expects timely reporting. Regular supervision missions, safeguard updates, and consultations are necessary to maintain compliance and trust.
Provincial Governors, Provincial Departments (PDRDs, DoE, DoLM)	High	High	Manage Closely	These actors influence project success at the provincial level, enabling or delaying activities based on their cooperation. Their local authority and interest in development make them essential allies requiring consistent updates and joint monitoring visits.
District and Commune Authorities, Village Chiefs	Medium to High	High	Manage Closely	They serve as intermediaries between the project and local communities. Their involvement in dissemination, feedback collection, and local conflict resolution necessitates their early and continued engagement throughout project cycles.
Ministry of Environment (MoE)	High	Low to Medium	Keep Satisfied	MoE holds regulatory power over environmental approvals. Though their day-to-day interest in this project is low, their influence is high. Keeping MoE satisfied with regular submission of environmental compliance reports avoids bureaucratic delays.
Ministry of Interior (MoI), Local Politicians	High	Low	Keep Satisfied	Mol influences local governance, and politicians can shape public opinion. Periodic briefings and involving them in major milestones ensures continued support.
Local Communities	Low	High	Keep Informed	These are the most affected by the project. Their interest is high as

Stakeholder Group	Influence Level	Interest Level	Quadrant Category	Engagement Strategy
(Men, Women, Farmers, Shopkeepers)			and Empower	they benefit from access and job opportunities but may suffer construction impacts. Engage them through community consultations, accessible information, and grievance mechanisms to enhance transparency and support.
Vulnerable Groups (Poor Households, Women, Youth, Elderly, Returnees)	Low	High	Keep Informed and Empower	These groups face barriers to participation. Tailored outreach, targeted employment strategies, and inclusive consultation methods are critical to ensure equitable benefits.
Indigenous Peoples (if present)	Low to Medium	High	Keep Informed and Empower	Indigenous communities require culturally appropriate engagement and FPIC if significant impacts occur. Use local facilitators, translation, and consultations respecting traditional leadership.
Civil Society Organizations and NGOs	Low to Medium	High	Keep Informed and Empower	NGOs concerned with road safety, Indigenous rights, or environmental protection may not control decisions but can mobilize opinion. Transparent sharing of information and invitation to observe key processes help maintain trust.
Contractors and Subcontractors	High (during construction)	High	Manage Closely	Once mobilized, contractors hold operational control. They must comply with safeguards and manage on-ground risks. Frequent meetings, orientation sessions, and performance monitoring are required.
Local Businesses, Transport Operators	Low to Medium	Medium	Keep Informed	Their services and operations benefit from improved roads. Inform them of timelines and access issues and invite input when relevant.
General Public (Non-project areas), Unrelated Ministries	Low	Low	Monitor (Minimal Effort)	These groups are not directly impacted. Maintain transparency through websites, public notices, and media. Monitor their sentiment in case interest increases.

25. This matrix will be regularly reviewed and updated during project implementation to reflect any changes in stakeholder roles, influence, or interest—particularly as the project transitions from design to construction and monitoring. By aligning engagement strategies with stakeholder mapping, the project can foster trust, minimize risks, and enhance the effectiveness of consultation and participation efforts. Special attention will continue to be given to vulnerable groups and local communities to ensure their voices are not only heard but also meaningfully considered in decision-making.

IV. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Information Disclosure

- 26. Timely and transparent information disclosure is the cornerstone of this Stakeholder Engagement Program. The project will ensure that all stakeholders, especially project-affected communities, have access to relevant information about the project in a language and format they can understand. Key principles for information disclosure under NRRPCP-II include: accuracy, timeliness, cultural appropriateness, and accessibility. The project will disclose a wide range of information throughout its lifecycle, including:
 - Project scope and rationale: Plain-language descriptions of the project objectives, components, locations (roads to be improved), and timelines. This was first disclosed during initial consultations and will be updated if there are changes or as subproject details are determined.
 - Environmental and Social information: Summaries of the ESMPF, RPF, IPPF, and this SEP will be publicly disclosed. The full documents have been made available on MRD's website and AIIB's website in English, and executive summaries are provided in Khmer. Communities will receive key points from these documents in leaflet form or oral presentations (e.g. what the project will do to mitigate dust, how land issues will be handled, how they can raise grievances, etc.). As site-specific instruments (e.g. ESMPs or IPPs or Resettlement Plans) are prepared for particular road segments, those too will be disclosed locally in the communities concerned and on the MRD website.
 - Land acquisition and compensation information: In case any land acquisition is required for certain subprojects, the affected people will receive clear information about their entitlements. This includes the cutoff date for eligibility, the compensation rates for different assets, options for compensation, and the process and schedule for compensation payments. Per SOP-LAR and project RPF, this information will be given via official letters, public meetings, and posted announcements well in advance of any land taking. For voluntary land donations, the conditions and procedures (including the right to refuse and the grievance process) will be explained to all potential donors individually and in group meetings.
 - Construction plans and schedule: Prior to the start of civil works in any locality, the project will
 inform the local communities about when and where construction will happen, and what to
 expect. This will be done through commune council meetings and by posting notices at the
 village level (for example, on community information boards or at pagodas/markets). These
 notices will include contact information of the contractor's site manager and the project's local
 liaison so people know whom to approach for questions or issues. If the schedule changes
 significantly, updated notices will be issued.
 - Employment opportunities and training: As part of the information campaign, details on how locals can seek employment on the project (e.g. where to register or whom to contact, what types of jobs, what the basic pay and conditions are) will be made public. This might be done via community labor orienting sessions, collaboration with village chiefs to announce at village meetings, and possibly local radio broadcasts. In addition, any planned training programs (such as Occupational Health and Safety training for local laborers or contractors) will be advertised so that interested individuals can participate.
 - Grievance Redress Mechanism (GRM): The existence and procedures of the project's GRM will be widely disseminated. Signboards at construction sites and commune offices will display GRM contact points (name or position and phone number) in Khmer. Pamphlets describing how to submit a grievance (and the assurance that no retribution will occur) will be distributed. In Indigenous areas, the information about the GRM will also be conveyed verbally in the local language by trusted intermediaries.
 - Progress updates and results: During implementation, the project will keep stakeholders informed of progress and any important developments. For communities, this could mean quarterly or biannual meetings to share what has been done (kilometers completed, number of local people employed, any adjustments to plans) and what is upcoming. For the broader public, MRD may issue press releases or update the project webpage with milestone achievements (e.g. "100 km of roads completed"). At the end of the project, a project

completion and results briefing will be disclosed to highlight benefits achieved (like number of beneficiaries, jobs created, etc.). This feeds into accountability and showing stakeholders the outcomes of the project they engaged in.

A variety of channels will be used to ensure wide reach:

- Community and Local Channels: For villagers, face-to-face communication remains most effective. This includes village meetings, announcements via loudspeakers (common in Cambodian villages via pagodas or commune offices), and engaging community representatives (village chiefs, elders, teachers) to spread messages. Notices and posters in Khmer will be placed in high-visibility local spots: commune council notice boards, health centers, schools, market centers, and at project site camps. For Indigenous villages, notices will be supplemented by pictorial materials if literacy in Khmer is low, and verbal communications via indigenous facilitators.
- MRD Website and AIIB Website: Project documents (ESMF, RPF, IPPF, SEP, etc.) are
 published online on the MRD's official site and AIIB's project portal. These are mainly for wider
 stakeholders like NGOs, researchers, or interested public who seek details. The SEP and other
 documents were uploaded in 2025 when finalized, fulfilling access-to-information requirements
 . The websites will also post summaries in Khmer of key documents.
- Social Media: MRD will utilize its Facebook page (as Facebook is widely used in Cambodia) to share major updates and also to provide a platform for community members to ask questions. Indeed, in previous projects, social media has been used to gather comments (e.g., a project Facebook page was used to receive community feedback in the Road Connectivity project). For NRRPCP-AF, the communication team will post construction updates, before-and-after photos of road improvements, safety tips, and GRM information on social media.
- Traditional Media: If needed, radio broadcasts in local languages may be used, especially to reach remote areas or for public service announcements about road safety campaigns. Local radio can broadcast short segments about the project's job opportunities or GRM contacts. For broader outreach, national or provincial radio/TV could be considered for important announcements (though given the project's local scale, community-level media is the focus).
- Meetings and Workshops: Periodic stakeholder workshops (at national or provincial levels) will also serve as disclosure fora. For example, annual workshops where MRD presents the project's progress to stakeholders including NGOs and other government agencies will allow dissemination of information and feedback gathering at the same time.
- 27. Information disclosure will be done in a timely manner. For example, draft safeguard documents were disclosed before finalization and approval, to allow stakeholder input. Going forward, any significant new information (like identification of a significant impact or change in project scope) will be communicated as soon as possible to those affected. The project is committed to ongoing disclosure, not a one-time event. This means communities will not just be informed at project start and end, but continuously, especially whenever there's something that concerns them (like schedule delays, or new subproject selection).
- 28. Crucially, all disclosed information will be in the Khmer language for local dissemination (and in relevant indigenous languages orally or in writing if needed). Technical jargon will be avoided in community materials. If needed, explanatory one-page briefs or FAQ sheets will be provided for instance, an FAQ on land acquisition could explain: "What if part of my land is needed? Answer: The project will compensate you following government rules and you have the right to refuse etc." This anticipates questions and provides transparency.

4.2. Consultation Activities

29. To ensure inclusive and responsive project implementation, the NRRPCP-II will follow a structured and phased consultation program that spans the entire project lifecycle—from planning and design, through construction, to completion and post-operation. Each stage of the project involves distinct objectives and stakeholder needs, requiring tailored engagement methods that respect cultural norms, local dynamics, and stakeholder diversity. The consultations will be designed as two-way processes, not only to disseminate information but

also to solicit meaningful feedback, identify risks early, and promote local ownership. Particular emphasis will be placed on engaging vulnerable groups, such as women, Indigenous communities, youth, and the elderly, through focused methods like small group discussions and home visits. For every consultation, the principle of free, prior, and informed participation will be upheld to ensure that stakeholders are fully informed and voluntarily involved in shaping decisions that affect them.

30. The matrix below provides a detailed overview of planned consultation activities across project phases, the stakeholders involved, the specific objectives of these engagements, the methods/tools to be used, and the expected frequency or timing of each activity.

Table 3: Consultation Schedule

Project Phase	Stakeholder Group	Consultation Objective	Methods/Tools	Frequency/Timing
Design & Planning	Local Communities (general)	Gather community- specific feedback on road alignments, design alternatives, and risk areas; ensure local ownership of final designs	Village-level public meetings; use of printed maps and posters; visual aids; breakout sessions by gender and age	Two per subproject before and at the DED stage; revisits if alignment changes
Design & Planning	Affected Persons (land/assets)	Inform about DMS results, cut-off dates, and compensation options; ensure agreement or documented voluntary donation	One-on-one DMS visits, group consultations with GDR, distribution of draft RP/LARP, use of translators if needed	Minimum two meetings per affected household; more if disputes arise
Design & Planning	Indigenous Peoples (if present)	Ensure cultural appropriateness in design; gather consent and feedback on social risks; inform IPP preparation	Introductory community meetings, FGDs (gender/age- separated), storytelling/mapping tools, household interviews, IP facilitators, FPIC process if needed	Multiple meetings per Indigenous community as needed through screening, SIA, and IPP development
Design & Planning	Local Authorities & Technical Departments	Coordinate responsibilities, confirm administrative support, review road network connections, discuss construction detours	District-level planning meetings, joint environmental field assessments, site visits with engineers	Once during DED; follow-ups as necessary during pre-construction preparation
Construction	Local Communities	Keep community informed on construction progress; identify and respond to	Monthly 'tool-box' meetings led by contractor & PIU; open Q&A format;	At least monthly at each active site; more frequently if needed

Project Phase	Stakeholder Group	Consultation Objective	Methods/Tools	Frequency/Timing
		daily disruptions or grievances	grievance intake incorporated	
Construction	Households newly impacted during construction	Address emerging issues like fence damage or drainage realignment not covered in DED	Ad-hoc consultations, photographic documentation, rapid compensation coordination	Immediately after issue arises; responsive mode
Construction	Indigenous Peoples (ongoing)	Monitor IPP implementation; verify satisfaction with mitigation measures and participation in employment opportunities	Community monitoring meetings, follow-up FGDs, home visits with Indigenous facilitators	Every 2–3 months or more frequently depending on community feedback
Construction	Contractor Workforce & Host Communities	Prevent social friction; agree on behavior norms; encourage positive interaction	Community-worker interface meetings, distribution of conduct guidelines, local leader briefings	Once at worker mobilization; follow- ups if incidents or complaints occur
Construction	All Stakeholders (mid-term)	Review engagement progress, gather feedback, identify course corrections for second half of project	Provincial/national- level consultation workshop, roundtable discussions with key reps	Once, mid-way through construction implementation
Completion & Handover	Local Communities	Inform community of project close- out, review any remaining issues, promote safety and care of assets	Village closure meetings, road use demonstrations (e.g. on crossings or culverts), grievance resolution review	Once after works completion per community
Completion & Handover	Commune Authorities & Maintenance Stakeholders	Discuss long-term road maintenance roles; promote local ownership; plan integration into commune budgets	Stakeholder planning meetings, maintenance training workshops, integration into Commune Investment Plans	Once per subproject handover; follow-up during post-project monitoring
Post- Completion	Community Members	Evaluate satisfaction, perceived benefits, and effectiveness of consultations; identify lessons for future	Household satisfaction surveys, community FGDs, semi-structured interviews with diverse groups	3–6 months post- construction; part of project M&E activities

Project Phase	Stakeholder Group	Consultation Objective	Methods/Tools	Frequency/Timing
All Phases	Vulnerable Groups (Women, Elderly, Youth, Disabled, Migrants)	Ensure representation, address specific concerns, and improve access to project benefits	Targeted FGDs, home visits, informal discussions, translated materials, timing accommodation	Embedded into each phase and consultation activity

31. This consultation matrix serves as a dynamic framework that will be updated periodically throughout the project as implementation progresses and as new stakeholders emerge or stakeholder roles evolve. For instance, contractors and subcontractors will become more central during construction, while local authorities will play a larger role in maintenance and sustainability planning post-handover. To ensure follow-up and accountability, the PMU's ESMU will regularly review consultation reports and track how stakeholder feedback is incorporated into decision-making. Where feasible, consultation summaries, attendance, and resulting actions will be disclosed to the public, further reinforcing the transparency of the process.

4.3. Reporting Back

- 32. A critical component of effective stakeholder engagement is "reporting back" to stakeholders that is, closing the feedback loop by informing stakeholders how their inputs have been considered and what decisions or actions have been taken in response. The NRRPCP-II is committed to providing such feedback at all levels, to build trust and demonstrate accountability. The mechanisms for reporting back include:
- 33. Direct Feedback to Communities: After each formal consultation or meeting with community stakeholders, the project team will summarize the key issues raised and, at a suitable time, convey back to the community how those issues are being addressed. For instance:
 - At the end of a village consultation meeting, facilitators will often do a "recap" verbally
 of the main points heard and explain on the spot which suggestions can be
 implemented, which will be considered, and which might not be feasible (with reasons).
 This immediate clarification helps manage expectations and shows villagers that their
 points were noted correctly.
 - In cases where issues require further study (e.g. a request to shift a road alignment or add a drainage that needs engineering input), the project will inform the community when they can expect a response (e.g. "We will discuss this with our technical team and come back next month with an answer"). Indeed, follow-up meetings will be scheduled to specifically report back on previously raised issues. Keeping promises on follow-up is crucial. The PIU social/environment officer will track issues and ensure they are addressed by the relevant technical staff before the next meeting.
 - The project will use simple flyers or information sheets to report back. For example, after an important phase like finalization of road design or outcome of a compensation agreement, a one-page summary in Khmer can be distributed in the village outlining "What We Heard" and "How It Was Addressed". These could be posted at the commune office or other public places. If literacy is a challenge, the summary will be delivered orally via community representatives or at a subsequent gathering.
 - A particular focus will be on reporting back to vulnerable groups who gave input. If
 women's groups requested certain actions (like more street lighting near markets for
 safety) the next consultation will explicitly address which requests are accepted. If
 Indigenous communities provided feedback on the IPP, MRD will go back to them with
 an updated plan showing how their input was incorporated (translated as needed).

• The Grievance Redress Mechanism also has a built-in reporting back function: each complainant will receive a response to their grievance (explaining the decision or action taken). Additionally, periodic community meetings will share general trends of grievances and how they were resolved, without breaching confidentiality. For example, "In the last quarter, we received 5 complaints about dust; we responded by increasing watering and all five were resolved." This demonstrates to the community that raising issues leads to action.

Reporting Back to Government and Institutional Stakeholders: For officials and institutions

- MRD will prepare minutes and reports of stakeholder meetings (like the national workshops, inter-ministerial meetings) and circulate them to participants. For instance, after a Project Steering Committee meeting or a multi-stakeholder workshop, a summary of decisions and agreed actions will be sent to all attendees (and non-attending invitees) within a couple of weeks. This ensures everyone has a common record and knows their roles in follow-up.
- When stakeholders like MoE or GDR provide inputs (e.g. GDR might suggest improving the
 compensation dissemination process based on field feedback), MRD will formally respond in
 writing on how that input is taken into account in implementation (perhaps included in updated
 RPF or in a letter).
- Provincial authorities will get quarterly progress updates from the PIUs, as a form of reporting back on how their earlier suggestions or requests (like coordination issues, security for equipment, etc.) have been handled.

Public Disclosure of Engagement Outcomes: To maintain transparency, the project will periodically disclose summaries of stakeholder engagement results:

- The semi-annual environmental and social monitoring reports prepared by MRD for AIIB will include a section on SEP implementation, summarizing engagement activities conducted, main issues raised by stakeholders, and the status of resolving those issues. These reports, once reviewed, may be made publicly available (e.g. on AIIB's website or MRD's site), effectively reporting to all interested parties on engagement outcomes.
- MRD's website can host a "Frequently Asked Questions (FAQ)" section for the project, which is periodically updated. This FAQ will essentially be a product of stakeholder questions. For example, if many stakeholders ask about when roads will be maintained or how jobs are allocated, an official answer can be posted. This is a way of reporting back to a wider audience beyond those in meetings.
- For Indigenous Peoples, the final IPP (if any) and its summary of consultations are disclosed to those communities, which serves as a formal record of how their input shaped the plan and what commitments the project has made to them.
- 34. Responsive Communication: Reporting back is not only formal. The project team (PMU and PIUs) will practice responsive communication via phone and in-person as well. If a commune chief calls the PIU with a community question, the PIU will find the answer and call back promptly even these small acts build trust. The community liaison officers that contractors assign will also be trained to communicate outcomes (e.g. if a villager complains to the contractor about something minor and the contractor fixes it, the officer will go back to confirm with the villager that it's resolved to their satisfaction a simple feedback closure).
- 35. Transparency about Limitations: Reporting back also means being honest if certain stakeholder requests cannot be accommodated. In such cases, the project will explain why. For instance, if a community asks for paving a road beyond the project's scope, MRD will report back that funding and scope limitations prevent it in this project, but the request is noted

for future planning. Or if safety concerns mean some request is denied (like villagers want to remove all speed bumps for faster travel, but that conflicts with safety for school children), the project will clearly state the rationale for sticking to the safety measure, referencing standards or agreements.

V. GREVIENCE REDRESS MECHANISM

5.1. GRM Structure and Process

36. The NRRPCP-II project maintains a comprehensive grievance redress structure to ensure that all individuals or groups affected by the project can raise concerns and have them addressed in a fair, timely, and transparent manner. To uphold accountability and foster trust, the grievance redress system includes two distinct mechanisms: (i) a formal GRM aligned with the Royal Government of Cambodia's Standard Operating Procedures for Land Acquisition and Resettlement (SOP-LAR 2018), administered by the General Department of Resettlement (GDR) under the Ministry of Economy and Finance; and (ii) a project-level GRM to manage grievances specifically related to construction activities, environmental nuisances, social concerns, and day-to-day implementation issues.

5.1.1. GDR-Managed GRM (Land Acquisition and Compensation if any)

37. For any grievances arising from land acquisition or IR impacts—such as those related to the Detailed Measurement Survey (DMS), compensation amounts, payment delays, or cases of contested voluntary donations—affected households have the right to file complaints through the formal process stipulated in the SOP-LAR 2018. The GDR, through the Inter-Ministerial Resettlement Committee (IRC) and its Working Groups at provincial level, will lead grievance management related to involuntary resettlement. Affected persons may raise grievances during disclosure of survey results or compensation offers. If not resolved locally, complaints can be escalated to the IRC-GDR at the national level. This mechanism ensures strict adherence to AllB's safeguards and Cambodian legal frameworks, with a structured process of investigation, resolution, and documentation. Complainants are provided with information on their rights, and resolutions are formalized. If they remain dissatisfied, stakeholders may seek redress through administrative or judicial channels, or via AllB's Project-Affected People's Mechanism (PPM).

5.1.2 Project-Level GRM

38. The project-level GRM is designed to address non-resettlement grievances related to civil works, environmental concerns, labor practices, or social and community impacts. It operates in a tiered fashion through a simple Step 1 to Step 4 process:

Step 1: Grievance Submission and Initial Resolution at the Commune Level

39. The first entry point for grievances is typically at the local or commune level. Each project commune appoints a GRM Focal Point, often a Commune Council member or respected village leader, trained to receive and document complaints. In parallel, the contractor's site office maintains a complaints box and designates a Community Liaison Officer or Site Manager to handle concerns specific to construction activities. Grievances may be submitted orally or in writing, and can relate to issues such as dust, noise, blocked access, improper behavior by workers, or damage to community assets. At this stage, many minor concerns can be resolved directly and informally between the complainant, local authorities, and the contractor—typically within 5–10 working days.

Step 2: Escalation to the District or Provincial PIU Level

40. If a grievance remains unresolved or requires more formal investigation, it will be escalated to the Project Implementation Unit (PIU) housed in the Provincial Department of

Rural Development (PDRD). The PIU's Environmental and Social (E&S) Officer, together with a small GRM committee (comprising technical officer, focal persons, and district officials), will review the complaint. A site visit may be organized if necessary. At this level, resolutions are expected within 15–30 working days, depending on the issue's complexity. Examples include structural design concerns, delays in response from the contractor, or community disputes over temporary access routes. All actions and decisions are formally recorded, and the complainant is notified in writing of the resolution.

Step 3: Review by the Central PMU and Project Steering Committee

41. Should the PIU-level process fail to satisfy the complainant, the case can be further escalated to the Project Management Unit (PMU) in Phnom Penh. The PMU's Environmental and Social Management Unit will re-evaluate the grievance and consult with relevant departments. If the issue involves high-level coordination (e.g., disputes involving multiple jurisdictions or violations of national policy), the matter may be forwarded to the Project Steering Committee (PSC) for resolution. The PSC, composed of senior officials from MRD, MEF, and other key agencies, provides high-level oversight. In this step, remedies may include re-designing project elements, commissioning independent experts, or offering supplementary support measures.

Step 4: Closure or Referral to External Mechanisms

- 42. Once the proposed resolution has been implemented and verified with the complainant, the grievance is marked as closed in the GRM logbook, and the outcome is documented for monitoring purposes. If the complainant is not satisfied with the final outcome, they are informed of their right to pursue external redress through the Cambodian judiciary or via AIIB's accountability mechanisms (such as the Project-Affected People's Mechanism). While the project seeks to resolve issues internally where possible, access to external and independent recourse remains protected.
- 43. The PPM serves as a vital platform for individuals and communities directly or indirectly affected by such projects, including residents, workers, and indigenous communities. It offers a clear avenue for addressing grievances arising from any perceived or potential non-compliance with the AIIB's Environmental and Social Policy (ESP). This includes situations where individuals have been denied access to information or meaningful consultation regarding a project, or where they are dissatisfied with the outcomes of project-level grievance redress mechanisms.
- 44. By providing a transparent and accessible platform for addressing concerns, the AIIB PPM demonstrates the Bank's commitment to accountability and its dedication to ensuring that its projects contribute positively to the lives of affected communities while adhering to the highest environmental and social standards. This commitment fosters trust and collaboration between the AIIB, project stakeholders, and impacted communities, ultimately contributing to the successful implementation of sustainable infrastructure projects across Asia and beyond.
- 45. The AIIB PPM can be accessed through the AIIB website where there are instructions provided on how to lodge a complaint including an on-line application form.1

^{1.} How We Assist You - Project-Affected People's Mechanism (aiib.org)

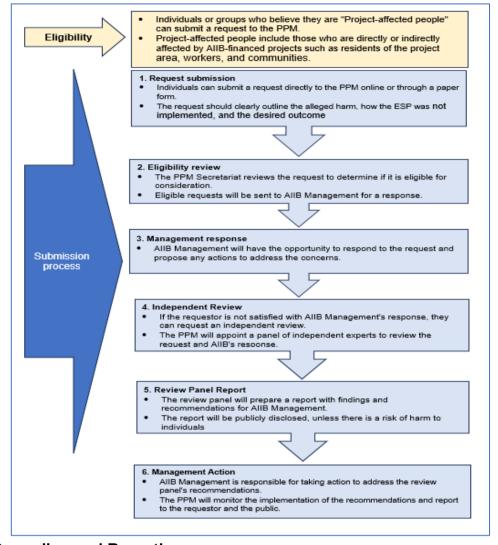


Figure 1: AIIB's PPM Submission and Review Process

5.2. Recording and Reporting

- 46. A robust system for recording and reporting grievances is a critical component of the GRM under the NRRPCP-AF. This ensures transparency, traceability, and accountability in the management of complaints, while also serving as a feedback mechanism to identify systemic issues and improve project implementation.
- 47. **Grievance Register and Case Tracking:** All grievances received at any level—whether at the commune, PIU, or PMU—will be recorded in a centralized Grievance Register maintained by the ESMU of the PMU. This register may take the form of a structured Excel database or a printed record book. Each complaint will be assigned a unique identifier and will include the date of submission, details of the complainant (if not anonymous), a clear description of the issue (including its location and relevant parties), the entry point (commune, PIU, or contractor), and all actions taken to date. It will also record the final resolution or outcome, date of closure, and any outstanding follow-up actions. The register will be updated in real-time as cases move through the resolution process.
- 48. To facilitate effective case tracking and analysis, the register may include separate tabs or categories—for example, by province, type of grievance (e.g., construction-related, land, environmental), or severity. GRM focal persons at the commune and PIU levels will be trained and responsible for ensuring timely and complete documentation of all grievances submitted orally or in writing.

- 49. **Standardized Forms and Documentation:** To support systematic recording, grievance intake forms will be used to capture all relevant details when complaints are submitted verbally. These forms will ensure that no information is lost during the initial interaction and will be signed by the recipient and, where appropriate, the complainant. Similarly, when a resolution is reached, a grievance resolution form will be completed to document the agreed actions. These may be co-signed by both the project and complainant, particularly for sensitive cases involving compensation or voluntary donation. These paper or digital records will be filed and linked to the master grievance register for accountability and audit purposes.
- 50. **Confidential Case Management:** For grievances involving sensitive matters—such as allegations of gender-based violence, labor exploitation, or corruption—a separate confidential log may be maintained. Access to these records will be restricted to authorized personnel only. While the sensitive nature of such grievances will limit the level of detail shared publicly, they will still be counted in grievance statistics for reporting purposes, ensuring that such cases are not overlooked while respecting the complainant's right to privacy.
- 51. **Internal Monitoring and Reporting:** The ESMU of the PMU will compile internal GRM reports on a monthly basis, summarizing key trends and statistics for project management. These reports will detail the number of new grievances received, resolved, or pending; the nature of complaints received; duration of unresolved cases; and any emerging patterns or severe issues. Such reports will inform the Project Director and technical teams of potential risks and allow for timely corrective actions. For instance, if multiple grievances originate from a specific contractor's area of work or commune, targeted engagement or remedial measures can be undertaken.
- 52. **External Reporting and Stakeholder Transparency:** The project is committed to sharing grievance-related information with its stakeholders to build trust and demonstrate the responsiveness of the GRM.
- 53. **Quarterly Progress Reports to AllB** will include a dedicated section on GRM status, with disaggregated data on grievances received and resolved, types of issues encountered, and significant resolution outcomes.
- 54. **Government reporting** will include communication with relevant agencies, particularly the Ministry of Rural Development and the General Department of Resettlement, to update them on grievances related to land acquisition or resettlement that fall within their remit. Serious unresolved issues may be escalated to the Project Steering Committee.
- 55. **Community-level feedback** will be provided during consultation meetings. Summaries of local grievances (e.g., "three grievances received in the last quarter related to dust and blocked access, all resolved") will be shared to illustrate the functioning of the GRM. Where community input led to design modifications or additional mitigation measures, this will also be communicated back to the affected groups, reinforcing the consultative and responsive nature of the project.
- 56. **Documentation of Complex Cases:** Where grievances remain unresolved for an extended period or escalate to higher levels (e.g., the PMU or external accountability mechanisms), all correspondence, meeting records, technical assessments, and decisions will be comprehensively documented. This not only protects the integrity of the project but also provides an evidentiary trail if cases are referred to the judiciary or AIIB's Project-Affected People's Mechanism (PPM). Such documentation includes signed meeting minutes, technical review notes, written resolutions or settlement proposals, and complainant feedback.
- 57. **Learning from Grievance Trends:** In addition to serving as an accountability tool, the grievance records will be regularly analyzed to identify underlying implementation issues. If recurring themes emerge—such as excessive dust in multiple sites or dissatisfaction with compensation processes—these will be flagged to the relevant implementation teams for review and improvement. The ESU will include such trend analysis in the semi-annual

safeguards monitoring reports submitted to AIIB, and key lessons will be discussed during internal management reviews.

VI. IMPLEMENTATION, MONITORING, AND REPORTING

6.1 Roles and Responsibilities

- 58. Effective and inclusive stakeholder engagement under the NRRPCP-II requires coordinated efforts across multiple actors, each playing a defined role in ensuring that stakeholders are meaningfully informed, consulted, and empowered throughout the project lifecycle. These responsibilities are distributed across MRD at the national level, Provincial and District-level Project Implementation Units, site contractors, local authorities, and community representatives. Ensuring clarity on these roles is essential to support smooth implementation, promote transparency, and uphold social safeguard commitments. The ESMU within the PMU will act as the lead agency overseeing and coordinating SEP execution, while PIUs and contractors will lead on-the-ground activities in their respective jurisdictions.
- 59. The table below presents a detailed delineation of roles and responsibilities of all key stakeholders involved in implementing the SEP. This structure enables the project to institutionalize stakeholder engagement functions at each level of decision-making and field operations, supporting early risk identification, culturally appropriate consultation, and effective grievance redress throughout planning, construction, and operation phases.

Table 4: Roles and Responsibilities for SEP Implementation

Actor/Stakeholder / Responsible Entity	Responsibilities
PMU Environmental and Social Management Unit (ESMU)	 Lead planning, oversight, and implementation of the SEP across all project phases. Coordinate stakeholder engagement activities at national level and provide technical guidance to PIUs. Monitor SEP and GRM implementation, ensure records are maintained, and integrate feedback into decision-making. Submit quarterly and semi-annual SEP progress reports to AIIB and other stakeholders. Develop and maintain stakeholder database, consultation logs, and grievance register. Provide technical backstopping and capacity building to PIUs and contractors on SEP and grievance resolution.
Provincial/District PIUs (hosted in PDRDs)	 Implement day-to-day SEP activities in their respective provinces/districts. Conduct local-level consultations, manage grievance handling at field level, and monitor contractor performance on community engagement. Maintain records of consultations, feedback received and resolved grievances. Report monthly to PMU on stakeholder engagement and GRM updates. Coordinate with Commune Councils and local stakeholders to ensure culturally appropriate and inclusive engagement.

Actor/Stakeholder / Responsible Entity	Responsibilities
Contractors and Subcontractors	 Engage with communities before and during construction regarding schedule, activities, and potential impacts. Designate Community Liaison Officers (CLOs) to receive and record construction-related grievances. Address construction-level complaints promptly (dust, noise, access disruptions) and inform PIU of actions taken. Disclose and implement Code of Conduct and site-specific Environmental and Social Management Plans (CESMPs). Participate in monthly GRM/consultation meetings at site level. Submit regular reports to PIUs on SEP compliance, community feedback, and GRM outcomes.
Commune Councils / Village Chiefs / Local GRM Focal Points	 Act as first-line liaison with affected communities for consultations and grievance intake. Organize community meetings and help facilitate inclusive participation, especially among women and vulnerable groups. Maintain GRM record books or complaint boxes and refer unresolved cases to PIUs. Support information dissemination and local-level monitoring.
GDR and Resettlement Working Groups	 Lead all consultations related to land acquisition, DMS, and compensation. Ensure affected persons are consulted in accordance with the RPF and SOP-LAR. Oversee grievance handling related to compensation claims and land disputes. Collaborate with PMU and PIUs to ensure smooth implementation of resettlement measures.
Indigenous Community Representatives / Elders (where applicable)	 Participate in IP screening, consultations, and IPP preparation. Facilitate culturally appropriate engagement methods and FPIC processes where triggered. Help monitor IPP implementation and provide feedback to the project team.

60. By clearly assigning duties across all levels of implementation, the NRRPCP-II ensures that stakeholder engagement remains a continuous and shared responsibility. This clarity of roles also supports early identification of issues, timely resolution of grievances, and effective community participation—particularly of vulnerable and Indigenous groups. Moving forward, periodic reviews of these responsibilities will be conducted to ensure they remain relevant and aligned with evolving project realities. Adjustments, if needed, will be integrated into updated versions of the SEP and communicated to all implementing partners.