



# **Chilime - Trishuli Transmission Line and Substations, Nepal**

## **STAKEHOLDER ENGAGEMENT PLAN**

**Final Report**

August, 2015

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## ANNEXES

- A: Stakeholder List
- B: Grievance Form

*Note: The epicentre of the 7.8 Gorkha Earthquake that hit Nepal on April 25th, 2015, was located only 50 km away from the Project area. The exact impacts to the Project area are not fully known yet. It is likely that the Project design will have to be amended due to impacts caused by the earthquake and the aftershocks. Any changes concerning this Project will be addressed during the next design stage.*

## 1

### **BACKGROUND AND OBJECTIVE**

This document is the Stakeholder Engagement Plan (SEP) for the Chilime – Trishuli Transmission Line and Substations Project (hereinafter referred to as “the Project”). The Project is being developed by the Nepal Electricity Authority (hereinafter referred to as “NEA” or “the Project Developer”), a governmental organization at national level, established in 1985. The Project is part of Nepal’s strategy to overcome the continuing power shortages and satisfy the growing demand of electricity.

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of others, and building relationships based on collaboration. Stakeholder consultation and disclosure are key elements of engagement and essential for delivery of successful projects.

The overall aim of this SEP is to ensure that a timely, consistent, comprehensive, coordinated and culturally appropriate approach is taken to consultation and project disclosure. It is intended to demonstrate the commitment of NEA to an international best practice approach to engagement in line with Nepali requirements, IFC’s 2012 Performance Standards (PS) on Environmental and Social Sustainability and the European Investment Bank’s (EIB) Environmental and Social Principles and Standards (2009), including EIB’s Social Assessment Guidelines (SAGs).

*This SEP is a living document, which will be amended and updated in the course of project planning and implementation.*

## 1.1

### *BRIEF DESCRIPTION OF THE PROJECT*

The Project is located in Rasuwa and Nuwakot districts approximately 40 km north northwest of Kathmandu and consisting of the following:

- Chilime 220/132 kV GIS Substation
- Trishuli – Chilime 220 kV Transmission Line (TL)
- Trishuli 3B Hub 220/132 kV AIS Substation
- 33/11 kV Neighbourhood Support Project (NSP)

The TL will serve as a connection between new hydropower plants in the Upper Trishuli Valley and Kathmandu Valley. The TL has a length of about 26.5 km and runs along the Trishuli River. The site location is presented in

The substations will require an area of about 5.3 ha (Trishuli) and 4.6 ha (Chilime). The 220 kV TL will consist of 39 angle towers with 15 m Right of Way (RoW) on each side of the TL. The tower bases will each have a size of around 15 m x 15 m.

The current stage of the Project is summarized below:

- the Feasibility Study has been finalized (December 2014);
- the Initial Environmental Examination (IEE) for Trishuli substation has been approved by the Ministry of Energy;
- the IEE for the TL and Chilime Substation has been submitted to the Ministry of Energy for approval;
- the land for Trishuli Substation has been acquired;
- acquisition of land for Chilime Substation is in process and almost complete (as of June 2015);
- the land for the TL will be acquired after the final survey by the contractor building the transmission line; and
- construction work is expected to start in May 2016 (B.S. Jestha 2073).

Figure 1

Site Location Map



## 1.2

### SOCIAL CONTEXT

The Project passes through 6 **Village Development Committees** (VDCs) and 22 settlements:

- **Goljung**
  - Thambuchet, Chyamdol
- **Gatlang**
  - Gre, Nasin village
- **Haku**
  - Hechambra dada, Sanu Haku, Relu odhar, Gursumba dada, Lumba dada, Gogane, Deurali dada
- **Dandagaon**
  - Kaptan Kharka, Siruchet, Khadku, Chipleti, Diyale, Dandagaon
- **Thulogaon**
  - Alchhi Bisauni, Salim bhitta village, Pairegau
- **Manakamana**
  - Archale Siran, Champani

There are 59 officially recognized Indigenous Peoples (IPs) in Nepal (*National Foundation of Development of Indigenous Nationalities Act, 2002*). 82.6 % of the population in the 6 project affected VDCs belong to these groups. Most of the people along the planned TL are Tamang (70.0 %). The other two IPs are Gurung (12.1 %) and Newar (0,5 %). The rest belong to the caste groups Brahmin Hill (9,9 %), Ghale (2.3 %) and Chhetri (1.2 %) and to the Dalit groups (“untouchable” castes) Kami (2.8 %), Damai (0.4 %) and Sarki (0.1 %).

The IPs speak their own language, but most of them also speak Nepali. The education level of the people living in the project affected VDCs is rather low, with an average literacy rate of 54 % (male: 60 %; female: 49 %). Agriculture is the main source of income.

## 2

### REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

According to national laws, the project requires only two Initial Environmental Examinations (IEEs) - one for the Trishuli substation and one for the TL and Chilime substation. A full scope ESIA is not needed for transmission lines and substations. However, in order to comply with the standards of the banks (KfW, EIB) additional components regarding stakeholder engagement and information disclosure were considered (see second and third bullet point below) which were not covered by the existing IEEs.

Stakeholder Engagement for the Project will be performed according to the following requirements:

- legislative requirements of the Federal Democratic Republic of Nepal;
- principles and procedures specified by the IFC Performance Standards on Environmental and Social Sustainability (January 2012), PS 1 (Stakeholder Engagement) and PS 7 (Indigenous Peoples)<sup>1</sup>; and
- principles and procedures specified by the EIB Environmental and Social Principles and Standards (2009).

## 2.1

### *NEPALI REQUIREMENTS*

In the Federal Democratic Republic of Nepal, the requirements for public consultation are guided by national laws and policies.

The Environment Protection Act (EPA), 1997, and the Environment Protection Rules (EPR), 1997, are the major legislations of Nepal defining the requirements of environmental impacts and public engagement for any development proposal. The Project requires an Initial Environmental Examination (IEE) as guided by the Environment Protection Rules, 1997 (Schedule 1)<sup>2</sup>. For carrying out IEE, Rule 7 (2) of the EPR, 1997 makes it mandatory for the Project Developer to publish a public notice in a national level daily newspaper and affix it in the concerned office of the Village Development Committee (VDC), in the school, in the hospital and/or the health-post. The VDC or the Municipality and District Development Committee (DDC) as well as concerned individuals or institutions can provide their written opinions and suggestions within 15 days. The Project Developer needs to further prepare a deed of public inquiry (Muchulka). The opinions and suggestions thus received need to be included in the IEE report.

Copies of the draft IEE report are provided by the Project Developer to the concerned VDCs and DDCs.

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<sup>1</sup> For the development of this SEP the IFC's handbook "Stakeholder Engagement" (2007) was used as a best practice guidance.

<sup>2</sup> According to Schedule 1 E(3) of EPR, 1997 with subsequent amendment (Nepal Gazette in 2065/11/26 BS), any transmission line of voltage level 132 kV or above, requires an Initial Environmental Examination (IEE).

## 2.2

### *INTERNATIONAL REQUIREMENTS*

EIB (European Investment Bank) and KfW Development Bank are supporting the Project. Thus IFC's 2012 Performance Standards (PS) on Environmental and Social Sustainability<sup>3</sup> apply to the Project. PS 1 describes the requirements for Stakeholder Engagement and Information Disclosure and PS 7 applies to Indigenous Peoples. Likewise, EIB's Environmental and Social Principles and Standards<sup>4</sup> are applicable to the Project (also see the Environmental and Social Handbook<sup>5</sup>). The EIB Standard 7 applies to the Rights and Interests of Vulnerable Groups and Standard 10 to Stakeholder Engagement.

### 2.2.1

#### *IFC Performance Standards on Environmental and Social Sustainability*

EIB and KfW are committed to community engagement that ensures the free, prior, and informed consultation of affected communities. Stakeholder Engagement shall be conducted on the basis of timely, relevant, understandable and accessible information, provided in a culturally appropriate format. In summary EIB & KfW require:

- *identification of people or communities* that could be affected by the Project, as well as other interested parties;
- *meaningful consultation* with Project-affected or other interested parties on environmental and social issues that could potentially affect them;
- disclosure of appropriate information and appropriate notification about this disclosure at a time when stakeholder *views can still influence the development of the Project*;
- stakeholder consultation during *all Project stages*, and starting *as early as possible* during Project planning and preparation;
- operation of a procedure by which people can *submit comments and complaints*;
- maintenance of a *constructive relationship* with stakeholders on an ongoing basis through meaningful engagement during Project implementation; and
- special provisions shall apply to consultations which involve *Indigenous Peoples* as well as individuals belonging to *vulnerable groups*<sup>6</sup>.

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<sup>3</sup> <http://www.ifc.org/performancestandards>

<sup>4</sup> [http://www.eib.org/attachments/strategies/eib\\_statement\\_esps\\_en.pdf](http://www.eib.org/attachments/strategies/eib_statement_esps_en.pdf)

<sup>5</sup> [http://www.eib.org/attachments/strategies/environmental\\_and\\_social\\_practices\\_handbook\\_en.pdf](http://www.eib.org/attachments/strategies/environmental_and_social_practices_handbook_en.pdf)

<sup>6</sup> People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by the Project than others and who may require particular measures to engage them in the process. Vulnerability is considered with regard to the Project context.



### ***IDENTIFICATION OF STAKEHOLDERS***

A stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the Project and its impacts. The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project. Stakeholder identification is an ongoing process, requiring regular review and updating as the Project proceeds.

The main groups of stakeholders identified so far are listed in Table 1. The list will be updated and modified in the course of the Project development by the Project Developer.

**Table 1**

**Identified Groups of Stakeholders related to the Project**

<b>Group of Stakeholders</b>	<b>Stakeholders</b>
<b>1. Land owner and users</b>	1.1 Individuals, legal entities, local administration holding land title documents 1.2 Tenants or occupiers without formal rights 1.3 Land users (grazing, farming or other activities);
<b>2. Local population</b>	2.1 Inhabitants of the project affected VDCs 2.2 Residents located near the two substations and the transmission line 2.3 Residents of settlements located near roads used for transporting materials during construction
<b>3. Administrative Bodies and Authorities</b>	3.1. National authorities (concerned ministries) 3.2. Regional authorities (district level government authorities) 3.3. Local authorities (VDCs)
<b>4. General public, Non-Governmental Organizations (NGOs) and independent experts</b>	4.1. General public 4.2 Specialized environmental, social and research organizations, NGOs 4.3 Experts on a national and international level
<b>5. Media</b>	5.1. Print media 5.2 Radio, TV 5.3. Internet sources
<b>6. Organizations involved in Project implementation</b>	6.1 Construction and design companies involved in implementation of the Project 6.2 Company staff 6.3 Contractors and contractor's staff
<b>7. Specific vulnerable groups who may be impacted by the Project.</b>	7.1 People with difficulty in engaging with the stakeholder consultation process 7.2 People with special vulnerability due to physical disability, social, political or economic standing, legal status, limited education, lack of employment or housing

The full list of stakeholders (administrative bodies, media and NGOs) is given in the *Annex A* to this SEP.

Vulnerable groups are population groups that suffer from discrimination, unequal access to rights, unequal access to and control over resources or unequal access to development opportunities. As a result, they may be poorly integrated into the formal economy, may suffer from inadequate access to basic public goods and services, and may be excluded from political decision-making. As a result, they risk being disproportionately affected by project-related risks and adverse impacts. Such groups may include ethnic, religious, cultural, linguistic minorities, indigenous groups, female-headed households, children and youngsters, the elderly, persons with disabilities, and the poor.

In Nepal, Indigenous Peoples (Janajati, Adibasi) and Dalit (“untouchables”) fall under the category of vulnerable groups. 59 ethnic groups are officially recognized as Indigenous Peoples by the Nepali government. In the project area, the Indigenous Peoples consist of Tamang, Gurung and Newar. The Dalit groups are Kami, Damai and Sarki. Furthermore, women, disabled, the elderly, displaced persons (e.g. resettlement due to the construction of Sanjen Hydropower Project to the west of Chilime substation) and landless farmers are also particularly vulnerable.

In the case of vulnerable groups, the Project Developer has to ensure that vulnerable individuals and groups are duly and timely consulted, making sure that their concerns are heard, taking into account individuals’ and communities’ specificities, and delivered in an appropriate form, manner and language. This may be done in the form of focus group discussions. In some cases, special efforts must be made to ensure that vulnerable members have access to consultation events or discussion forums.

For projects with adverse impacts to Indigenous Peoples (IP), the Project Developer is required to engage them in a process of Informed Consultation and Participation (ICP)<sup>7</sup>. Furthermore, the process of Free, Prior and Informed Consent (FPIC) has to be applied in case IP are physically displaced<sup>8</sup> or if the Project is associated with any of the below listed potentially adverse impacts identified below<sup>9</sup>:

- impacts on lands and natural resources subject to traditional ownership or under customary use;
- relocation of Indigenous Peoples from lands and natural resources subject to traditional ownership or under customary use;

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<sup>7</sup> IFC Guidance Notes 103 & 104

<sup>8</sup> EIB: For projects that may lead to physical displacement of Indigenous Peoples, the Promoter is required to obtain their Free, Prior, and Informed Consent (FPIC).

<sup>9</sup> IFC Guidance Note 27

- significant impacts on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples lives, including natural areas with cultural and/or spiritual value such as sacred groves, sacred bodies of water and waterways, sacred trees, and sacred rocks; or
- use of cultural heritage, including knowledge, innovations or practices of Indigenous Peoples for commercial purposes.

The Project will impact land in possession of IPs, therefore FPIC has to be applied in this Project.<sup>10</sup> FPIC is a specific right for indigenous peoples as recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169/1989.

**Free:** A process that is self-directed by the community, free of coercion, expectations, intimidation, incentives or manipulation.

**Prior:** Prior means that consent has been sought sufficiently in advance of any authorization or commencement of activities and that respect is shown for time requirements of indigenous consultation/consensus processes.

**Informed:** The type of information that is provided should:

- be accurate,
- be in an appropriate language,
- include information, when available, on social, economic, environmental and cultural impacts and reasons for proposed activities, duration, affected locality, proposed benefits sharing and legal arrangements and people likely to be involved,
- be in a form that is understandable and that takes into account traditions of the community.

**Consent:** Consent must be sought and granted or withheld according to the unique formal or informal dynamic of each community.

The strategy and method for obtaining FPIC should be outlined in a communication plan (including the timeline and required resources). This can be a separate document from the SEP or can be integrated in future versions of this SEP.

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<sup>10</sup> The Land Acquisition and Compensation Plan (LACP), currently under preparation by NEA ESSD, will determine the exact extend of these impacts.

The following measures should be part of this strategy:

**During Project Design (e.g. before the Detailed Design Phase):**

- Indigenous Peoples should participate either directly or through their own freely chosen representatives and/or customary or other institutions specify which of these is entitled to express consent (or lack of) on their behalf.
- Organize meetings where the Project and its proposed activities and the impacts and mitigation measures are explained (i.e. discussing the results of the IEEs and the IEE Addendum, providing translated copies of the Non-Technical Summary).
  - The meetings should be conducted in a form that takes the traditions of the community into account.
  - Allow time for discussion without any project staff in attendance, when the IPs can discuss whether they are prepared to provide their consent, or return at an agreed later date for this purpose.
  - The inclusion of a gender perspective and the participation of women are essential, as well as the involvement of community members of different ages as appropriate (e.g. focus group discussions).
- Recording of the consultations.
- Recording the consent or non-consent.
  - Consent will be expressed in a collective manner through community representatives. The IPs will convey their decision either in writing using a template prepared by NEA or, if preferred, orally. If a document is prepared, it will be signed by the village head and will indicate that the decision was reached by consensus. The names, sex, ages, ethnic group, and occupation of each participant in the village meeting will be recorded in an annex to the document.

**During Project Development and Implementation:**

- Regular stakeholder meetings to determine whether the project responded to local communities' needs and aspirations.

**During Monitoring and Evaluation:**

- Monitoring and Evaluation will take into account IPs' issues and will evaluate whether the Project has been implemented in line with FPIC.

**Note:** It is advisable to apply FPIC to all other affected people, not just indigenous groups. Engaging the majority of affected people in the Project

area in a special way may cause discontent among the people who do not qualify as indigenous groups.

5

## **STAKEHOLDER ENGAGEMENT PROGRAM**

The following stakeholder engagement activities are planned for the project implementation phase:

1. Pre-construction: Disclosure of the two IEEs, the IEE Addendum and Non-Technical Summary (NTS) (starting [to be filled in by NEA]);
2. Construction (envisaged May 2016 / B.S. Jestha 2073); and
3. Operation (envisaged June 2018 / B.S. Ashadh 2075).

At each stage, certain engagement activities will be conducted to keep the stakeholders informed and continuously reach for their feedback.

This version of the SEP has been prepared for Phase 1 (Disclosure of the IEEs and supplemental ESIA documents) and will be disclosed together with:

- the two IEEs;
- the IEE Addendum;
- the Non-Technical Summary; and
- the Environmental and Social Management Plan (ESMP).

Any individual or group wishing to make comments on the SEP is invited to do so as part of the current disclosure process.

Future versions of the SEP which are under responsibility of NEA should be consulted with affected communities to achieve feedback on perception of engagement during the pre-construction phase. Specific information should be presented how indigenous and vulnerable groups will be consulted (e.g. formats of events); mechanisms to feed disclosure results back and to consider them.

The tables below give a brief description of actions that have already taken place and actions to be taken to implement this SEP.

Detailed plans for later phases of the Project will be developed during the next phases of the Project (construction and operation). The intention will be to continue an active program of engagement with affected and interested parties to ensure they are kept informed and have an opportunity to continue a constructive dialogue about the Project and with the Project Developer NEA.

Table 2

*Stakeholder activities that have already been undertaken*

Activity/Element	Target Stakeholders	Description	Timing
1. Formal newspaper notices	All stakeholders	The public notice was published in Gorkhapatra (dated Dec 18, 2014) seeking the views, opinions and suggestions about the project. The advertisement referred the readers to the project contact address for further information, and also explained where the copies of IEE can be inspected or copied.	Within 15 days of notice publication
2. Draft IEE document in hard copies	All stakeholders	The draft IEE report was made available in hard copies for public inspection at the DDC offices of Rasuwa and Nuwakot, whereas the hardcopies of the executive summary (in Nepali language) were made available in all six VDC offices for public inspection	All materials were made available for review and comment for 15 days, starting Dec. 18, 2014
3. Public notice at each VDC office and places of people congregation.	All stakeholders	Copies of the public notice (published in Gorkhapatra) were affixed in all the Project affected VDC offices; DDC Office, and other places of people congregation like health-post, CFUG offices. Public deeds were also prepared.	Within 15 days of notice publication
4. Collection of Views/ Opinions and Suggestions	All stakeholders	Views and suggestions of stakeholders were collected in written form and incorporated in the draft IEE report	After the publication of notice (Dec 18, 2014 onwards)
5. Receiving approval or consent letters from the stakeholders	VDC, CFUGs	Consent/ Approval letter from 2 CFUG (Chankang and Shree Dakshinkalika); all 6 Project affected VDCs (Goljung, Thulogaun, Dadagaun, Gatlang, Haku and Manakamana) have been received.	After the publication of notice (Dec 18, 2014 onwards)

Table 3

*Action Plan for Future Stakeholder Engagement and Disclosure*

Activity/Element	Target Stakeholders	Description	Timing
6. Online publication of all documents on the project website (in English and Nepali language).	All stakeholders	This SEP, the updated IEEs, the NTS and the ESMP will be available in digital format (as pdf files) on the project website ( <a href="http://www.nea.org.np">www.nea.org.np</a> ). The project website will provide an email address ( <a href="mailto:ct220kv.dctlp@nea.org.np">ct220kv.dctlp@nea.org.np</a> , <a href="mailto:tr3bs220kv@gmail.com">tr3bs220kv@gmail.com</a> ) where written submissions can be emailed and a postal address for written submissions: Nepal Electricity Authority Transmission Directorate Chilime-Trishuli 220 kV Transmission Line Project	All online materials will be available for review and comment for 30 days, starting on <b>[to be filled in by NEA]</b> . They will also remain available on the website thereafter but the on-line email facility for receipt of comments will be closed.

Activity/Element	Target Stakeholders	Description	Timing
		<p>Kharipati, Bhaktapur +977-1-6616784</p> <p>The Project website will contain details of the Grievance Procedure (see Section 5 of this SEP).</p>	The online grievance procedure will remain open for public use for the foreseeable future.
7. Availability of the Project documents as hard copy in Bhaktapur, Thambuchet, Manakamana and the offices of the affected VDCs	All stakeholders	<p>The IEEs and the IEE Addendum, the NTS and other public information documents will be available in hard copy for public inspection at</p> <ul style="list-style-type: none"> <li>- the office of the Chilime-Trishuli 220 kV Transmission Line Project, Kharipati, Bhaktapur,</li> <li>- the Project Site Office in Thambuchet, Rasuwa,</li> <li>- the Project Site Office in Manakamana, Nuwakot,</li> <li>- Gatlang VDC Office,</li> <li>- Goljung VDC Office,</li> <li>- Haku VDC Office,</li> <li>- Thulogaun VDC Office,</li> <li>- Dadagaun VDC Office, and</li> <li>- Manakamana VDC Office.</li> </ul> <p>Comment forms will be provided for people to give their comments.</p>	All materials will be available for review and comment for 30 days, starting on <b>[to be filled in by NEA]</b> .
8. Project information 'hotline'	All stakeholders	<p>A staffed project information hotline will be in operation for the duration of the 30 day consultation period: +977-1-6616784. It will be manned during normal business hours in Kathmandu and outside of these, an answer phone facility will be available so callers can leave a message and if needed can be called back during business hours. The telephone number will be advertised by the communication channels described in this SEP (homepage, newspaper, public meeting).</p>	Hotline will be operational for 30 days, starting on <b>[to be filled in by NEA]</b> .
9. Formal newspaper notices	All stakeholders	<p>The public hearings are announced in newspapers in the Nepali language 20 days in advance and cover results of the EIA. The advertisements will refer readers to the project website for further information, and explain where copies of the disclosure documents can be inspected.</p>	20 days in advance of the public hearings
10. Notices at public places	All stakeholders	<p>NEA will make notices at public places. This information channel will also be used to announce construction/increased traffic activities.</p>	20 days in advance of the public hearings/continuously during Project implementation.
11. Appoint Community Liaison Officer to act as connection between	Local population	<p>The local liaison officer will be appointed and employed by NEA. He will be the local point of contact for the affected communities. His responsibility include providing Project related information on behalf of NEA (e.g. related to start of major construction</p>	Open ended.



Activity/Element	Target Stakeholders	Description	Timing
NEA and the stakeholders		operations or traffic in areas open to public) and receiving grievances made orally or filled via the grievance form.	
12. Comment Form and Grievance Form	All stakeholders	A pre-printed comment form (see <i>Annex B</i> ) will be made widely available during public meetings and in the Project area. Comments can also be provided orally, by email or by telephone and will be logged by the SGE/WPY Complaints Manager. Comments from individuals can be provided anonymously if wished.	Open ended.
13. Install grievance boxes in Thambuchet and Manakamana and the offices of the affected VDCs	Local population	The grievance boxes will be installed at the Project Site Offices in Thambuchet and Manakamana and at the VDC offices in Gatlang, Goljung, Haku, Thulogaun, Dadagaun and Manakamana and will be equipped with grievance forms so that the people can file written grievances. The Community Liaison Officer will be responsible for emptying the grievance boxes on a regular basis and provide the NEA Complaints Manager with the grievance forms.	Open ended.
14. Engagement of vulnerable groups	Vulnerable groups	Vulnerable groups within the community that will require particular measures to engage them in the process (e.g. focus group discussions), the Complaints Manager and his team will identify appropriate means of making contact, explaining the Project and understanding their views. See also Chapter 4.	During Project Design and as needed
15. Engagement of Indigenous Peoples	Indigenous Peoples	Engage IPs in a process of Informed Consultation and Participation (ICP) and undertake Free, Prior and Informed Consent (FPIC). See also Chapter 4.	During Project Design and as needed
16. Future SEP versions	Local population	Future versions of the SEP, which are under responsibility of NEA, should be consulted with affected communities to achieve feedback on perception of engagement during the pre-construction phase. Specific information should be presented how indigenous and vulnerable groups will be consulted (e.g. formats of events); mechanisms to feed disclosure results back and to consider them.	During Project Implementation and Operation or as needed

## 6 *GRIEVANCE PROCEDURE*

### 6.1 *OVERVIEW*

A grievance is considered to be any complaint about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments and concerns about Project activities during construction or operation, or perceived incidents or impacts have been addressed,.

A Grievance Procedure specific to the Project will be developed with the following aims:

- to build and maintain trust with all stakeholders;
- to prevent adverse consequences of failure to adequately address grievances; and
- to identify and manage stakeholder concerns and thus support effective risk management.

### 6.2 *INSTITUTIONAL SETUP*

NEA will establish an Environmental Management and Grievances Redress Unit under the Project organizational setup. This Unit will be under direct supervision of the Project Manager Office (PMO) and will have three sections, namely the Land Acquisition and Rehabilitation Section (LARS), the Project Information Center (PIC) and the Mitigation Implementation Section (MIS). LARS will be responsible for the implementation of land acquisition and rehabilitation program, whereas public disclosure work will be conducted through PIC. The MIS will implement mitigation measures proposed in the IEEs. The MIS will coordinate the work district level agencies such as District Forest Office, District Development Committee, and District Land Revenue and others.

### 6.3 *GRIEVANCE PROCEDURE*

The Grievance Procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available on the Project website, in other materials and during stakeholder consultation. Also, NEA will require its contractors to establish a grievance mechanism for all workers. This will be included in the contracts. All workers will be informed of the grievance process and new workers will be informed when they join the

Project. Information on contact points will be posted on staff information boards and on site information boards. The grievance procedure comprises the following steps:

1. **Identification of grievance:** Stakeholders shall be able to use the following methods to submit a grievance:
  - oral via Project information hotline or the Community Liaison Officer;
  - by filling the grievance form online ([www.nea.org.np](http://www.nea.org.np)); and
  - in writing via the grievance boxes located at the Project Site Offices in Thambuchet and Manakamana and at the VDC offices in Gatlang, Goljung, Haku, Thulogaun, Dadagaun and Manakamana.

The grievance is recorded and classified in the 'Grievance Log' (written and electronic) by the Complaints Manager employed by NEA. The Grievance Log will be held at NEA's office.

2. **Grievance is formally acknowledged** through a personal meeting, phone call, or letter as appropriate, within 10 working days of submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.
3. **The Complaints Manager delegates the grievance** in writing to the relevant NEA department(s)/personnel /contractor for development of an appropriate response. The Complaints Manager will estimate the subject matter of this grievance and identify the risk category. If required, the grievance may be sent for consideration of the senior management.
4. **A response is developed** by the delegated team and Complaints Manager with input from the Senior Management and others, as necessary. The Project should consider the establishment of a conflict resolution "committee" for the management of complex grievance issues. The set-up of this committee should be agreed upon with NEA representatives, local authorities and traditional leaders / community representatives during the establishment of the grievance mechanism.
5. **Required actions are implemented** to deal with the issue, and completion of these is recorded on the grievance log.
6. **The response is signed-off** by the Complaints Manager. The sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance to indicate agreement.
7. **The response is communicated to the affected party;** the response should be carefully coordinated. The Complaints Manager ensures that a suitable approach to communicating the response to the affected party is agreed and implemented. The response to a grievance will be provided 20 working days after receipt of the grievance.

8. **The response of the complainant is recorded** to help assess whether the grievance is closed or whether further action is needed. The Complaints Manager should use appropriate communication channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood and is satisfied with the response. The complainants' response should be recorded in the grievance log. Ideally, both parties should sign off the grievance to confirm closure.
9. **The grievance is closed** with sign-off from the Complaints Manager, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required the Complaints Manager should return to Step 2 to re-assess the grievance and then take appropriate action. Once the Complaints Manager has assessed whether the grievance can be closed, he/she will sign off to approve closure of the grievance on the grievance log or by written communication.

The Grievance Form is presented in *Annex B*.

If actions taken on a grievance are not resolved to the satisfaction of the complainant, a stakeholder may turn to court in accordance with the existing legislation of Nepal.

According to experience with development projects in Nepal, the following main types of grievances can be expected:

1. grievances related to land acquisition and resettlement requirements, and
2. grievances related to compensation or entitlement. If the Project Affected People (PAP)/Households (Hhs) or local community are not satisfied with the decision of the Compensation Fixation Committee/Local Consultative Forums (LCFs) or in absence of any response of its representatives, within 35 days of the complaint, the PAP/Hhs or community may submit its case to the District Court for the issues related to acquisition and compensation.

Other types of grievances may occur as well though.

## 7

### **RECORDING AND MONITORING**

This section presents an overview of the reports that will be used to report on and monitor stakeholder engagement activities.

## 7.1 *STAKEHOLDER REGISTER*

It is important that issues raised during the consultation process are recorded in a logical and systematic way. The register will record:

- reference number for the stakeholder;
- name and contact details (unless requesting anonymity);
- date of contact(s);
- issue(s) raised (comment, suggestion, question, complaint, etc.);
- proposed response and actions to be taken; and
- status (recorded, active, closed).

Where many stakeholders raise similar issues these will be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

## 8 *COMMUNITY PROGRAMMES AND BENEFITS*

As described in the IEEs and IEE Addendum, the following activities and programmes related to public health and safety, education and benefits will be undertaken:

- A Health, Sanitation and Safety Program will be conducted to alert local communities to construction related safety issues and electrocution and educate them about health and sanitation issues.
- Anti-climb guards will be installed at the base of each tower and an education programme for local schools will be developed to highlight the dangers of e.g. kite flying in proximity to the overhead lines.
- The necessary precaution and warning signs will be placed at major construction sites and dangerous areas to make local people aware of the construction activities and the associated risks. Access to construction areas and the substations will be restricted to authorized people only.
- Workers will be trained and instructed on how to act in a responsible manner during and after working hours, including rules on interactions with local communities to prevent conflicts with local

residents or other disruptions. The Project developer will communicate and implement a strict code of conduct.

- NEA will recruit unskilled workers from within the Project area and the affected communities.
- The water supply of the Project area will be strengthened by installing new pipelines and by improving the storage of water at the source.
- Development of a Conservation Awareness Programme to educate about the importance of forest conservation, plantation and economic importance of forest and its role in rural society.
- A Wildlife Conservation Awareness programme will be implemented. The programme will cover the importance of wildlife conservation, wildlife occurrence in the Project area, existing rules and regulations with respect to wildlife and benefits associated with the wildlife conservation.
- NEA plans to establish one tree nursery in Nuwakot and one in Rasuwa during the first year of project construction. Community Forest Users Groups will be trained for this purpose. The Project will provide seeds and the required technical support. The seedlings will be purchased and used by the Project for its reforestation programme.
- A training program for skills like welding, plumbing, electrical wiring etc. will be established. A training package will be developed to encourage people to initiate their business.
- A training programme on improved agricultural farming system will be established. The program will train the local communities in farming of local vegetables and applying new techniques for better yield.
- Furthermore training programs concerning livestock farming, fruit cultivation, medicinal herbs, use of organic fertilizer, irrigation techniques, appropriate cropping patterns, and methods of harvesting, processing and storage will be conducted.
- A training programme on tourism and handicraft will be provided to the Project affected people.

- A skill development programme (e.g. baking, beauty parlour, tailoring, handicraft, computer training, secretary) will be provided to women in the affected VDCs.

## 9

### *REPORTING*

NEA will update this SEP prior to construction and a second time prior to operation. Additional updates due to Project development may be required. In the process of updating the SEP the past stakeholder engagement activities will be described.

Annual reports will be made available to affected communities concerning ongoing risks, impacts and mitigation measures.

### 9.1

#### *EVALUATION OF EFFECTIVENESS*

The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the SEP. This evaluation will examine the extent to which activities were implemented in accordance with the SEP, including FPIC (see Chapter 4) and the extent to which they achieved the aims defined here. The results and any lessons learned will then be incorporated into further updates of the SEP as the Project evolves.

## CONTENTS

# ANNEXES

- A: Stakeholder List
- B: Grievance Form



ANNEX A

## Stakeholder List

No	Stakeholder	Contact details (address, phone, fax, e-mail)
<b>Project Developer</b>		
1.	Nepal Electricity Authority Transmission Directorate Chilime-Trishuli 220 kV Transmission Line Project	Kharipati, Bhaktapur, Nepal Phone : +977-1-6616784 Fax : +977-1-6616784 E-mail: ct220kv@gmail.com ct22kv.dctpl@nea.org.np webpage: www.nea.org.np
<b>National Supervisory Authorities</b>		
1.	Ministry of Energy, Government of Nepal	Singh Durbar, Kathmandu, Nepal tel. : + 977-1-4211516 Fax : +977-1-4211510 E-mail : info@moen.gov.np webpage: www.moen.gov.np
2.	Department of Electricity Development	Post Box No. 2507 576 Bhakti Thapa Sadak (4), Anamnagar Kathmandu, Nepal Phone: +977-1- 4480326, 4479507, 4480425 Fax:+977-1- 4480257 email: info@doed.gov.np webpage: www.doed.gov.np
3.	Ministry of Forest and Soil Conservation	Singh Durbar, Kathmandu, Nepal tel: +977-1-4211567 fax: +977-1-4211868 webpage: www.mfsc.gov.np
4.	Department of Forest	Babarmahal, Kathmandu tel: +977-1-4220303, 422123, 4216379 fax : +977-1-4227374 email : info@dof.gov.np webpage: www.dof.gov.np
5.	Ministry of Federal Affairs and Local Development	Singh Durbar, Kathmandu, Nepal tel: +977-1-4200000, 4200309 Fax : +977-1-4200318 email: info@mofald.gov.np webpage: www.mofald.gov.np
6.	Ministry of Home Affairs	Singhdurbar, Kathmandu, Nepal Phone: 4211208, 4211214 Fax No. : 4211257, 4211286 Email: <a href="mailto:gunaso@moha.gov.np">gunaso@moha.gov.np</a>
<b>District Level Government Authorities</b>		
1.	District Development Committee (DDC)	Dhunche, Rasuwa

No	Stakeholder	Contact details (address, phone, fax, e-mail)
	Office, Rasuwa Local Development Officer (LDO): Gajendra Kumar Thakur	tel. +977-10-540142, 540252, 540257, 540144 fax: +977-10-540143 email: info@dderasuwa.gov.np webpage: www.ddcrasuwa.gov.np
2.	District Development Committee (DDC) Office, Nuwakot LDO: Rajendra Kumar KC	Bidur, Nuwakot webpage: http://ddcnuwakot.gov.np/
4.	District Forest Office, Rasuwa District Forest Officer: Rajendra Prasad Niraula	Dhunche, Rasuwa tel. +977-10-540107
5.	District Forest Office, Nuwakot Asst. Forest Officer: Rajkumar Yadav	Bidur, Nuwakot tel: +977-10-560007
6.	District Administration Office, Rasuwa Chief District Officer (CDO):	Dhunche, Rasuwa tel: +977-10-540131
<b>Local Level Government Authorities</b>		
1.	Gatlang VDC Office Rasuwa	VDC Secretary: Nirmal Magrati
2.	Goljung VDC Office Rasuwa	VDC Secretary: Tikam Bahadur Shahi
3.	Haku VDC Office Rasuwa	VDC Secretary: Nirmal Magrati
4.	Thulogaun VDC office Rasuwa	VDC Secretary: Purna Bhandari
5.	Dadagaun VDC Office Rasuwa	[to be filled in by NEA]
6.	Manakamana VDC Office Nuwakot	[to be filled in by NEA]
7.	Dadagaun Health-Post Rasuwa	Asst. Health Post Incharge: Pren Narayan Sah
<b>Project affected CFUGs (Community Forest User Groups)</b>		
1.	Naonggang Pakha CFUG Rasuwa District, Goljung VDC, ward-9	[to be filled in by NEA]
2.	Goljung Pigore CFUG Rasuwa District, Goljung VDC, ward-1 - 9	[to be filled in by NEA]
3.	Gilgung /Pachgode CFUG Rasuwa District, Goljung VDC, ward-1 - 9	[to be filled in by NEA]
4.	Changkang CFUG Rasuwa District, Gatlang VDC, ward-7,8	President: Raju Tamang

No	Stakeholder	Contact details (address, phone, fax, e-mail)
5.	Bomjomane CFUG Rasuwa District, Gatalang VDC, ward-1 - 6	[to be filled in by NEA]
6.	Jomokharka Nehasing CFUG Rasuwa District, Haku VDC, ward- 1	[to be filled in by NEA]
7.	Nehasingpakha CFUG Rasuwa District, Haku VDC, ward-2	[to be filled in by NEA]
8.	Rilunehasing Danda CFUG Rasuwa District, Haku VDC, ward-2,7	[to be filled in by NEA]
9.	Thulo haku kaloban CFUG Rasuwa District, Haku VDC, ward-4,6	[to be filled in by NEA]
10	Shree Dakshinkalika CFUG Rasuwa District, Haku VDC, ward-8,9	[to be filled in by NEA]
11	Gogane Mahila CFUG Rasuwa District, Haku,9, c/o Dachhinkali	[to be filled in by NEA]
12	Guptipakha CFUG Rasuwa District, Dandagaun VDC, ward-7	[to be filled in by NEA]
13	Dharmapakha CFUG Rasuwa District, Dandagaun VDC, ward-6 ,7	[to be filled in by NEA]
14	Chipletipatal CFUG Rasuwa District, Thulogaun VDC, ward- 8,9	[to be filled in by NEA]
15	Kareli Gaunthali CFUG Rasuwa District, Thulogaun VDC, ward- 8	[to be filled in by NEA]
16	Dhuskore CFUG Rasuwa District, Thulogaun VDC, ward- 8	[to be filled in by NEA]
17	Chhangetuppo CFUG Rasuwa District, Thulogaun VDC, ward- 7	[to be filled in by NEA]
18	Jamblehirpakha CFUG Nuwakot District, Manakamana VDC, ward- 5	[to be filled in by NEA]
<b>Design Contractors</b>		
1.	[to be filled in by NEA]	
<b>Mass media</b>		
1.	[to be filled in by NEA]	
2.	[to be filled in by NEA]	
3.	[to be filled in by NEA]	

No	Stakeholder	Contact details (address, phone, fax, e-mail)
4.	[to be filled in by NEA]	
<b>Non-government organizations</b>		
1.	UNDP (United Nations Development Programme)	<b>UNDP:</b> UN House P.O Box 107 Kathmandu, Nepal Phone: +977-1-5523200 Fax: +977-1-5523991, 5523986 E-mail: registry.np@undp.org Website: <a href="http://www.np.undp.org/content/nepal/en/home/operations/contact_us.html">http://www.np.undp.org/content/nepal/en/home/operations/contact_us.html</a>
2.	RCIW (Rural Community Infrastructure Works Programme): Supported by DFID (Department for International Development)	<b>RCIW:</b> Organization located address: Simikot VDC, Ward No. 4, Humla Nepal Phone: 087-680152 E-mail: info@hcdakarnali.org.np  <b>DFID:</b> Gail Marzetti (Head of DFID Nepal) DFID Nepal British Embassy PO Box 106 Kathmandu, Nepal Phone: +977 1 5542980 Fax: +977 1 5000179 E-mail: nepal-enquiries@dfid.gov.uk
3.	DACA (Decentralized Action for Children and Women): Supported by UNICEF (United Nations International Children's Emergency Fund)	<b>UNICEF:</b> P.O. Box 1187 UN House, Pulchowk, Lalitpur Kathmandu, Nepal tel. +977-1-5523200 fax. +977-1-5527280, 5535.395 email: kathmandu@unicef.org
4.	RAIDP (Rural Access Improvement and Decentralization project): Supported by IDA (International Development Association)	<b>RAIDP:</b> Jawalakhel, Lalitpur, Nepal. Attn: The Project Coordinator. Phone: +977-01 -5546268, 5543505. Fax: +977-01-5546524. E-mail: raidppcu@dolidar.gov.np.  <b>IDA:</b> HEADQUARTERS The World Bank 1818 H Street, NW USA Washington, DC 20433 Phone: (202) 473-1000 Fax: (202) 477-6391

No	Stakeholder	Contact details (address, phone, fax, e-mail)
5.	Agricultural Perspective Plan Programm (DFID)	Department for International Development (DFID) E-mail: gd-mcdonald@dfid.gov.uk Phone: +44.1355.84.3228 Fax: +44.1355.84.3327
6.	MEDEP (Micro enterprise Development Program): Supported by UNDP (United Nations Development Programme)	MEDEP Project focal point: Dr. Ramji Prasad Neupane National Programme Manager Dhobighat, Lalitpur P.O. Box 107 Kathmandu, Nepal Tel: 977-1-5541949, 5541951 Fax: 977-1-5541950 E-mail: info@medep.org.np  UNDP focal point: Ms. Nabina Shrestha Poverty and Inclusion Unit UNDP UN House, Pulchowk P.O.Box 107 Kathmandu, Nepal Phone: 977-1- 552 3200 Fax: 977-1-552 3991 E-mail: registry.np@undp.org.np
7.	NDVS (National Development Volunteer Service)	NDVS: Address: Baluwatar, Kathmandu, Nepal Contact Nos: +977-1-4446285, +977-1-4446329 Website : www.ndvs.gov.np E-mail: info@ndvs.gov.np

ANNEX B

## Grievance Form

## Public Grievance Form

Reference No (assigned by NEA):

*Please enter your contact information and grievance. This information will be dealt with confidentially.*

*Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by NEA.*

Full Name

\_\_\_\_\_

Anonymous submission

I want to remain anonymous

Please mark how you wish to be contacted (mail, telephone, e-mail).

By mail (please provide mailing address): \_\_\_\_\_  
\_\_\_\_\_

By telephone (please provide telephone number): \_\_\_\_\_

By e-mail (please provide e-mail address): \_\_\_\_\_

Preferred language for communication

Nepali

English

Other, please specify: \_\_\_\_\_

Description of incident or grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of incident/grievance:

\_\_\_\_\_

One time incident/grievance (date \_\_\_\_\_)

Happened more than once (how many times? \_\_\_\_\_)

On-going (currently experiencing problem)

What would you like to see happen to resolve the problem?

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Please return this form to:** NEA, Mr./Mrs. **[to be filled in by NEA]**

We will register your complaint within 10 working days and provide an answer within 20 working days.