

Stakeholder Engagement Plan (SEP)

**Baucau Municipal Capital Water Supply Program
(P516103)**

**Ministry of Public Works
Democratic Republic of Timor-Leste**

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Abbreviation

BTL	Bee Timor-Leste Empresa Publica
CCA	Climate Change Adaptation
C-ESMP	Contractor – Environmental and Social Management Plan
CoC	Code of Conduct
CGAP	Country Gender Action Plan
DAF	Directorate of Administration and Finance
DED	Detailed Engineering Design
DEI	Directorate of Engineering and Investments
DOM	Directorate of Operation and Maintenance
EA	Executing Agency
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
ES	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESS	Environmental and Social Standard
GMF	<i>Grupu Maneja Fasilidade</i> (community water management groups)
GM	Grievance Mechanism
GoTL	Government of Timor Leste
HIRADC	Hazard Identification, Risk Assessment and Determining Control
HR	Human Resources
KONSSANTIL	National Council for Food Security, Sovereignty and Nutrition in Timor-Leste
LMP	Labor Management Procedure
MoEd	Ministry of Education
MoF	Ministry of Finance
MoH	Ministry of Health
MoJ	Ministry of Justice
MPW	Ministry of Public Works
MSA	Ministry of State Administration
NDLPCS	National Directorate of Lands, Properties and Cadastral Services
OHS	Occupational Health and Safety
PSC	Project Supervision Consultant
PMU	Project Management Unit
PZ	Pressure Zone
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEIS	Simplified Environmental Impact Statement
SEP	Stakeholder Engagement Plan
SMASA	Municipal Water, Sanitation and Environmental Service
SOP	Standard Operating Procedures
TOR	Terms of Reference

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Glossary of Key Terms

Affected Communities - Refers to groups of people living in close proximity to a project that could potentially be impacted by a project (“Stakeholders,” in contrast, refers to the broader group of people and organizations with an interest in the project).

Child Labor - A worker who is above the minimum age of 14 (or as specified by national law) and under 18 years of age that is employed or engaged in connection with the project.

Community Workers - People employed or engaged in providing community labor.

Consultation - The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

Contracted Workers - People employed or engaged through third parties to perform work related to core functions of the project, regardless of location.

Direct Workers - People employed or engaged directly by the Project to work specifically in relation to the project.

Engagement - A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.

Environmental and Social Impact Assessment - An assessment comprising various social and environmental studies which aim to identify project impacts and design appropriate mitigation measures to manage negative impacts, and to enhance positive ones.

Forced Labor - A worker who performs any work or service to the project not voluntarily, without the free and informed consent of the worker, under threat or other circumstances of restriction or deceit.

Grievance Redress Mechanism - a process for receiving, evaluating, and addressing project-related complaints from citizens, stakeholders and other affected communities.

Non-governmental Organizations - Private organizations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.

Partnership - In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

Primary Suppliers - Those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential to the core functions of the project.

Stakeholders - Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (IFC’s Handbook on Stakeholder Engagement (2007)); workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g. local authorities, neighboring projects, and/or nongovernmental organizations, etc.

1. Introduction

1. The purpose of this Stakeholder Engagement Plan (SEP) is to identify the key stakeholders of the Water Supply and Sanitation Project, Baucau subproject and propose stakeholder engagement measures. The project will have a strong communication and stakeholder engagement to ensure that all the stakeholders are being informed and consulted both prior and during project implementation and are given the opportunity to influence project activities. The SEP has been prepared according to the Environmental and Social Standards (specifically - ESS10: Stakeholder Engagement and Information Disclosure) of the World Bank Environmental & Social Framework (ESF) and will cover the whole life of the Project.

1.1 Project Background

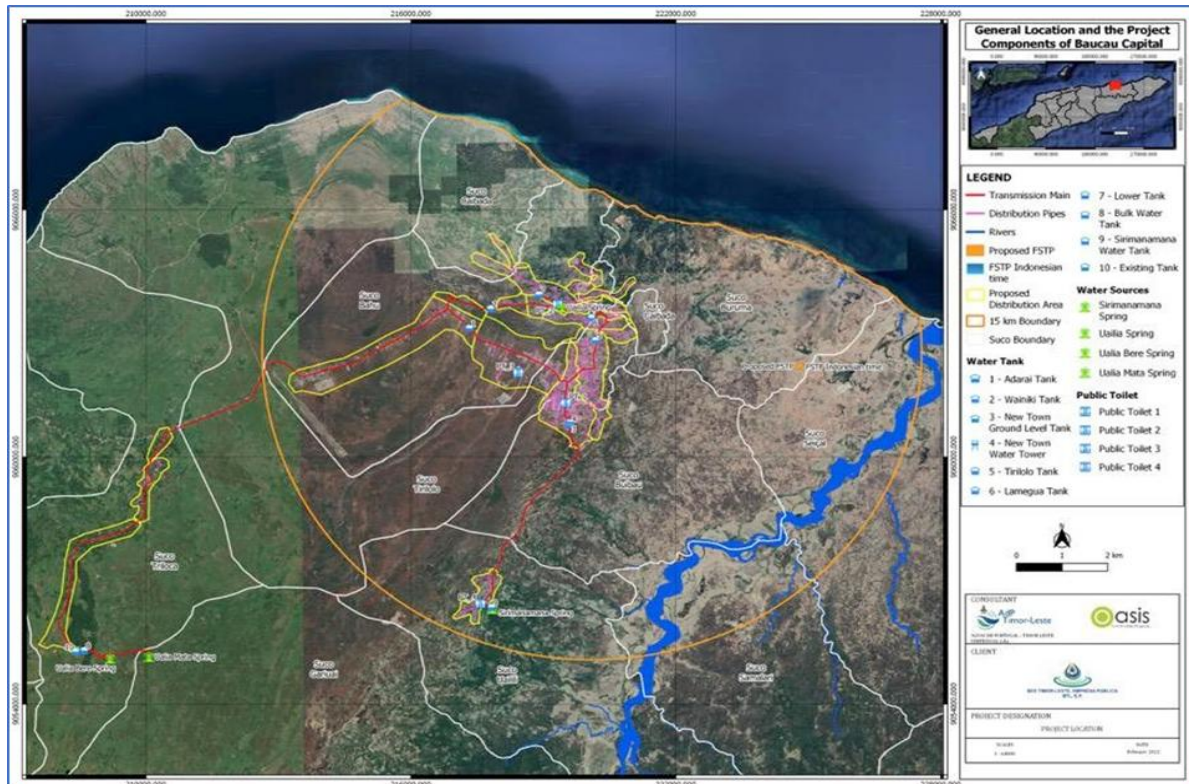
2. The Baucau Municipal Capital Water Supply Project aims to improve the quality of life of urban populations in the municipal capital of Baucau by providing safe, climate-resilient, and affordable drinking water services. The Project is expected to deliver safely managed water supply services to approximately 41,000 people through 5,700 household connections by 2031. The Project is aligned with the Timor-Leste Strategic Development Plan (2011–2030) and contributes to strengthening water security, enhancing climate resilience, and promoting sustainable management of water resources.
3. The Project responds to key water sector challenges identified in Timor-Leste, including limited access to reliable and safe water supply, vulnerabilities of water sources to climate variability, and institutional capacity constraints in service delivery. The Project focuses on improving water supply services in Baucau municipal capital, including peri-urban areas covering ten sucos.
4. The Ministry of Public Works (MPW) is the Implementing Agency (IA) responsible for overall project management, implementation, and monitoring. Bee Timor Leste Empresa Publiku (BTL, E.P.) will act as the Project Management Unit (PMU) and will be responsible for fiduciary management, environmental and social risk management, reporting, and technical implementation. BTL will also operate the water supply system upon completion.
5. Environmental and social instruments, including a Simplified Environmental Impact Statement (SEIS) and Environmental Management Plan (EMP), were prepared in 2022 in accordance with national regulations and an environmental license was granted. These instruments, along with the Stakeholder Engagement Plan (SEP), Resettlement Action Plan (RAP), and Labor Management Procedures (LMP), will be updated as needed to align with the final project scope, detailed engineering design (DED), and World Bank Environmental and Social Framework (ESF) requirements.

1.2 Component 1: Water Supply Infrastructure Development.

6. This component will finance the construction, rehabilitation, and upgrading of a centralized water supply system in the municipal capital and selected peri-urban areas of Baucau. The objective is to provide reliable, continuous, and safe drinking water supply services that meet international quality standards and are resilient to climate variability. The component is expected to benefit approximately 41,000 people through the installation of 5,700 household connections. Key activities include:
 - a) Updating Detailed Engineering Designs (DEDs), including hydraulic modelling, technical specifications, and system optimization to ensure climate resilience and sustainability.
 - b) Rehabilitation of existing and construction of existing and new intakes and the protection of the respective source
 - c) Expansion of storage capacity through construction of bulk water reservoirs, ground-level reservoirs, and elevated tanks to enhance supply reliability and drought resilience;
 - d) Installation of chlorination facilities to ensure water quality and reduce reliance on household-level treatment;

- e) Construction of buildings for operational use, including storage facilities and water quality laboratories;
- f) Replacement and extension of transmission and primary distribution pipelines, including installation of bulk meters; and
- g) Construction of distribution networks, household connections, and micro-metering systems to improve service delivery and water use efficiency.

Figure 1 Project Location Map



1.3 Component 2: Project Management and Supervision

7. This component will support the effective implementation and sustainability of the water supply infrastructure developed under Component 1. The water supply system will be operated by BTL in the Municipality of Baucau.
8. The component will finance supervision of construction activities and provide technical assistance (TA), capacity building, training, and operational support, including:
 - a) Technical, environmental, and social supervision of project implementation, including the implementation of the Gender Action Plan (GAP);
 - b) Monitoring and evaluation (M&E) activities and project audits;
 - c) Strengthening the service provider’s capacity, systems, and procedures for operation and maintenance (O&M) of the water supply system; and
 - d) Provision of technical assistance and operational support to ensure sustainable service delivery.
9. The Project will be implemented by MPW, with Bee Timor Leste Empresa Publica (hereinafter referred as “BTL”) serving as the PMU responsible for day-to-day management, including fiduciary, technical, and environmental and social aspects. BTL will also assume responsibility for the operation and maintenance of the system after construction.

10. This Stakeholder Engagement Plan (hereinafter referred as “SEP”) is prepared to identify the main stakeholder engagement requirements from the World Bank’s Environmental and Social Framework and risks that are associated with the project, and determine the mitigation and resources necessary to support this activity. As a living document, this SEP will be updated throughout the Project implementation.
11. This SEP is prepared to guide MPW as the Project Implementing Agency, BTL as the PMU, Contractors/Primary Supply and/or all third parties in establishing the approach to identify the potential risks and impacts on Project workers and impacted communities that typically result from construction works and other activities under Component 1 and component 2, and in ensuring inclusive and effective stakeholder engagement throughout the Project lifecycle.

2. Scope, Objectives, and Structure of the SEP

2.1 Purpose and Objectives of SEP

12. The purpose of the SEP is to provide a framework for appropriate stakeholder consultation and information disclosure in the context of the Timor Leste Water and Sanitation which meets both the National legislation and World Bank ESF requirements. The goal of the SEP is to facilitate project participatory decision-making by involving project-affected parties (PAPs), citizens in the project locations, and other stakeholders in a timely manner so that these groups are provided enough opportunity to voice their opinions and concerns to shape both the design and implementation of the project to incorporate those concerns. Following the guidance of the ESS10 of the World Bank’s ESF requirements, the objectives of the SEP are to:
 - a) Establish a systematic approach to stakeholder engagements that will help to identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties;
 - b) Assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance;
 - c) Promote and provide means for effective and inclusive engagement with project- affected parties throughout the project cycle on issues that could potentially affect them;
 - d) Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
 - e) Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.
13. Specifically, SEP serves the following purposes:
 - a) Stakeholder identification and analysis;
 - b) Planning how the engagement with stakeholder will take place;
 - c) Information disclosure;
 - d) Consultation with stakeholders;
 - e) Addressing and responding to grievances;
 - f) Monitoring and reporting on Stakeholder Engagement.
14. This SEP will be disclosed by MPW, the Project Implementing Entity, of the World Bank and BTL, E.P. of the MPW on its website. Moreover, the websites of relevant Municipality Agencies, under MPW will be used to disclose the SEP with links to the BTL, E.P. online Platform. The document will be disclosed in a manner accessible to stakeholders, and feedback received during consultations and through the disclosure process will be taken into account and incorporated, as appropriate, into the final version of the SEP.

2.2 Principles of Effective Stakeholder Engagement

15. The project's Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on "International Best Practice" include the following:
- a) Commitment is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process;
 - b) Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust;
 - c) Respect is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized;
 - d) Transparency is demonstrated when community concerns are responded in a timely, open and effective manner;
 - e) Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities;
 - f) Trust is achieved through open and meaningful dialogue that respects and upholds community's beliefs, values and opinions.

3. Regulatory Framework

3.1 Relevant National Laws and Regulations

16. Timor Leste does not have a standalone, cross-sector law dedicated to stakeholder engagement. However, public consultation requirements are established within the environmental regulatory framework.
17. Public consultation is mandated under Decree-Law No. 5/2011 on Environmental Licensing (as amended by Decree-Law No. 39/2022), particularly within the Environmental Impact Assessment (EIA) process. Article 11 provides for public consultation as part of project evaluation. In addition, Ministerial Decision No. 47/2017 establishes detailed procedures and requirements for public consultation during environmental assessment. These include consultation during the preparation of Environmental Impact Statements (EIS) and Environmental Management Plans (EMP), as well as consultation on draft documents to obtain feedback from affected stakeholders.
18. Public consultation aims to ensure access to information, raise awareness of potential environmental impacts and mitigation measures, and facilitate public participation in decision-making
19. According to Article 27 of the Timor Leste's Constitution of 2002, citizens may present complaints concerning acts or omissions on the part of public bodies to the Ombudsman, who shall undertake a review, without power of decision, and shall forward recommendations to the competent organs as deemed necessary. As mentioned in the Ombudsman of Timor Leste's website, complaints related to human rights can be submitted through online form, email, call to the given Dili office number, by visiting the Dili office or regional offices located in Baucau, Maliana, Oecusse and Same, or by submitting a written complaint in one of the designated boxes located the District Administration office in each of Timor Leste's 13 Municipalities.

3.2 World Bank Environmental and Social Standard on Stakeholder Engagement

20. The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS-10), "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". Specifically, the requirements of ESS-10 are as follow:

- a) Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders.
 - b) Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
 - c) The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) Stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
 - d) The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
21. This standard requires that the Borrower develops a Stakeholder Engagement Plan (SEP) that is proportionate to the nature and scale of the project and its potential risks and impacts, disclose it as early as possible before project appraisal, and seeks the views of stakeholders on the SEP, including on the identification of stakeholders and proposals for future engagement. An updated SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version. In addition, the Borrower should also develop and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

3.3 Gap Analysis between National Legislation and World Bank

22. The table below provides a brief analysis of the gaps and differences between the national legislation and World Bank requirements and details how these gaps will be addressed under the Project.

Table 1 Gap Analysis between the National Legislation and the World Bank

National Legislation	World Bank ESF	Project
<p>The national legislation has no requirement for a structured Stakeholder Engagement Plan (SEP) covering the full project lifecycle, although public consultation requirements exist under the EIA framework</p>	<p>Consultation with stakeholders and public involvement are the integral parts in the development and implementation of the SEP.</p>	<p>Timor Leste currently does not have clear national legislative provisions on the citizen and stakeholder engagement for specific investment programs and projects. In those cases, it relies on the relevant provisions of the WB requirements. The project will carry out a comprehensive consultative process with project - affected persons, local and state authorities, other stakeholders as being required through public disclosure meetings, individual consultations, and public consultations.</p>
<p>Public consultation is</p>	<p>ESS10 requires continuous</p>	<p>The project will ensure</p>

<p>primarily required during the environmental assessment stage and is not explicitly required throughout project implementation.</p>	<p>stakeholder engagement throughout the project lifecycle, including design, implementation, monitoring, and closure.</p>	<p>continuous stakeholder engagement throughout all stages of the project lifecycle in line with ESS10.</p>
<p>The national legislation has provisions that allow citizens to make complaints and grievances, but these provisions do not allow anonymity. The anonymous or submitted petitions without indicating the petitioner's postal or email address are not examined.</p>	<p>The World Bank ESS-10 allows the option of anonymous provision of grievances</p>	<p>The project will apply the WB standard and allow anonymous submission of grievances and complaints</p>
<p>The national legislation does not have special provisions to identify vulnerable groups during the consultation process or to tailor engagement measures to ensure their effective participation.</p>	<p>The ESS-10 specifically provides for the identification and engagement with the vulnerable groups that might be affected by the project to ensure that these groups also benefit from the project activities.</p>	<p>The SEP will identify affected vulnerable persons and engagement mechanisms to ensure that their voice is heard, and the concerns are addressed to the extent possible by the project.</p>
<p>The national legislation does not have provisions to establish a Project specific GRM.</p>	<p>According to the ESS-10 and ESS-2 the Project specific GRM should be established and be easily acceptable for all stakeholders at each stage of Project, including specific GRM for project workers.</p>	<p>The Project specific GRM will be established for all stakeholders at each stage of the Project, including GRM for all project workers.</p>

4. Summary of Previous Stakeholder Engagement Activities

23. The Project has undertaken a series of stakeholder consultations during the initial project scoping and design phase in 2020–2021, which informed the early development of project components and environmental and social considerations. Following this period, the Project experienced a hiatus in preparation. In 2026, stakeholder engagement activities resumed, including public consultation meetings (PCM) and focus group discussions (FGDs), to reflect updated project design, scope, and field conditions. These consultations have provided opportunities to inform stakeholders of project changes and to gather updated feedback and concerns from affected communities. Further details of these engagement activities, including key issues raised and responses provided, are summarized in the Table 2 below.

Table 2 Stakeholder Engagement Activities during Project scoping and early preparation

Project Phase	Stakeholders	Date	Topic	Issues raised
Project scoping and design	Community Nearby the project area	2 October 2020	<p>Presented the broad outline of the proposed Project, to receive information on the existing water supply (i.e., price, source, quality and quantity/access), and to gather community recommendations regarding the Project.</p> <p>Presented the various components of (Water supply, Sanitation, and Social Safeguards guidelines)</p> <p>The importance of women’s participation in the project progression and their opinions, ideas and suggestions being of equal importance from men’s</p> <p>The importance of having a good communication was also emphasized as it will help improve the project design and the success of the project implementation.</p> <p>The participants were also informed of the cut-off date, it’s relevance to the project and why the Socio-Economic Survey (SES) and Detail Measurement Survey (DMS) activities are being conducted by the Consultant.</p>	Which spring is being considered in this project to have potential of supplying all 11 Sucos in Baucau?
Project scoping and design	Rice Field Farmers	9 October 2020	<p>The impact of the project in water availability</p> <p>AdP Timor Leste is present to explain, from a technical point of view the work that has been done and the future design and respective potential impact on downstream users as all as implication on potential land uses and compensation mechanism that are currently in place for affected households.</p>	<p>No concerns raised.</p> <p>Supportive, constructive comments on how to push the project.</p>

Project Phase	Stakeholders	Date	Topic	Issues raised
			The participants were also informed of the cut-off date, it's relevance to the project and why the Socio-Economic Survey (SES) and Detail Measurement Survey (DMS) activities are being conducted by the Consultant.	
Project scoping and design	FGD with the Females in the nearby project area	10 November 2020	<p>Introduced the Detail Engineering Design Project in terms of water supply and sanitation of each Municipalities and the project benefit for the community.</p> <p>The benefit of the public toilets to female group in terms of community-based income generating activity.</p>	<p>No concerns raised.</p> <p>They participate in the voting of cost of public toilet user.</p> <p>Supportive, constructive comments on how to push the project.</p>
Project scoping and design	Ministry of Education and Culture, Ministry of Health, Labor and Social Protection	November 2021	<p>The donor's policy framework on safeguards</p> <p>Tentative design of the project components to meet the expectations.</p> <p>Arrangement for the project preparation.</p> <p>Discussions about the localities/sites included in the project.</p> <p>Alignment of the project with national strategy</p> <p>Investment viability of the project.</p> <p>Contribution of the project to the country's economic development, poverty reduction and shared prosperity.</p> <p>Project preparation timeline and the documentation required, such as the Environmental and Social Impact Assessment (ESIA) & Environmental and Social Management Framework (ESMF, the</p>	<p>No concerns raised.</p> <p>Supportive, constructive comments on how to push the project.</p>

Project Phase	Stakeholders	Date	Topic	Issues raised
			Stakeholder Engagement Plan (SEP) and the compliance with gender requirements of the World Bank. Technical meeting to discuss objectives and approach for WASH interventions in the areas of health and education. Design of components and methodology for selection of subprojects.	
Project scoping and design	Meeting with local stakeholders: Water and Sanitation Utility Providers & LPA	November 2021	Meeting to present overall Project objectives and activities and implementing arrangements and MPW requirements. Discuss Utility and gender assessments. Identification of local focal points for MPW activities	No concerns raised. Supportive, constructive comments on how to push the project.
Project update and re-engagement (post-design revision)	Affected Households (AHs), community members (including Samalakuliba and Afagua communities), local leaders, women groups	14–17 April 2026; 25–30 April 2026 (FGDs) and 15 April 2026 (PCM)	Presentation of updated project scope and components (water supply and social safeguards), including changes in water source; explanation of eligibility criteria, compensation process, upcoming socio-economic survey (SES) and Detailed Measurement Survey (DMS), and project GRM. Discussions also emphasized inclusive participation (including women) and the importance of continuous communication.	Community members raised concerns regarding the change of water source from Siri Mana-Mana to Uai-Sarake, particularly due to existing community use of the spring. Participants requested clearer technical explanations on water abstraction and its potential impacts on existing users. At the same time, strong support for the Project was expressed by some communities due to ongoing challenges in accessing clean water. The PMU clarified that feasibility studies confirmed the adequacy of the selected sources and that multiple water sources (including Uailia Mata, Uailia Bere, and Uailewa) would

Project Phase	Stakeholders	Date	Topic	Issues raised
				be used, with only part of the Uai-Sarake flow abstracted.

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5. Stakeholder Identification and Analysis

25. In order to define a communication and consultation process with the stakeholders, several groups that may be interested and/or affected by the Project implementation have been identified. There are several groups of people and social groups who are interested in the Project at different levels and can be classified as (i) Project Affected Parties (ii) other interested parties and (iii) disadvantaged or vulnerable groups.

5.1 Project Affected Parties (PAPs_

26. Project Affected Parties (PAPs) include individuals and entities who are directly affected, either positively or negatively, by the Project. These stakeholders will be closely engaged throughout the Project lifecycle to ensure that their views are taken into account in project design and implementation. These include:

- Community members who will benefit from improved water supply services in the municipal capital of Baucau and selected peri-urban sucos;
- Households and individuals who may be temporarily or permanently affected by construction activities (e.g., dust, noise, traffic disruption);
- Landowners and land users (including those under customary tenure) who may be affected by land acquisition for project infrastructure such as intakes, reservoirs, or pipelines;
- Communities located in proximity to water sources (e.g., springs) that may be used by the Project; and
- Local businesses and informal livelihood actors whose economic activities may be disrupted during construction.
- Project workers (including contracted and non-local labor) who may be involved in construction and project implementation.

5.2 Other interested parties

27. Other Interested Parties include individuals, groups, and institutions that may not be directly affected by the Project but have an interest in its implementation or may influence its outcomes. These stakeholders will be engaged through information sharing, consultations, and coordination mechanisms to support effective project implementation. These include:

- Government institutions at national and municipal levels, including the Ministry of Public Works (MPW), Ministry of State Administration (MSA), Ministry of Finance (MoF), Ministry of Health (MoH), Ministry of Education (MoEd), and the National Directorate of Lands, Properties and Cadastral Services (NDLPCS) under the Ministry of Justice (MoJ);
- Bee Timor Leste Empresa Pública (BTL, E.P.) as the Project Management Unit (PMU) and future service provider;
- Municipal authorities of Baucau involved in local coordination and community engagement;
- Traditional leaders (Lian Na'in), who play a key role in customary decision-making and management of natural resources;
- Suco Councils and local governance structures at village level;
- Water source owners and custodians, particularly for spring sources used by the Project;

- Religious institutions (including the Church), which have strong influence in community mobilization and social acceptance;
 - Veterans groups, police, and military representatives, who may play a role in community dynamics and local governance;
 - Contractors and subcontractors involved in construction and implementation activities.
 - Development partners and international organizations working in the water sector, such as the World Bank, Asian Development Bank (ADB), UNICEF, and WaterAid;
 - Civil society organizations (CSOs), community-based organizations (CBOs), and non-governmental organizations (NGOs) active in water, governance, and community development;
 - Academic institutions, private sector actors, and the general public.
28. Particular attention will be given to women and other vulnerable groups who may face increased exposure to risks associated with project-worker interactions during construction and household-level service connections. Targeted measures will be implemented to ensure safe, inclusive, and culturally appropriate engagement.

5.3 Disadvantaged / vulnerable individuals or groups

29. The Project recognizes that certain individuals or groups may be disproportionately affected by the Project or may face barriers to participating in the consultation process. Specific measures will be taken to ensure that these groups are adequately informed and able to participate meaningfully in the stakeholder engagement process. Targeted engagement strategies will be developed to ensure that these groups are effectively reached, their concerns are understood, and their participation is facilitated throughout the Project lifecycle. At this stage, disadvantaged/vulnerable individuals or groups within this Project could consist of:
- **Female-headed households**, who may be impaired from accessing information because they are disproportionately impacted by poverty, access to resources or lack of voice in the community, or because they have limited time to participate because of their activities and various commitments, but could be adversely impacted by Project activities such as workers influx;
 - **Elderly people**, who may be impaired from accessing information, maybe because they are incapacitated to read, to hear or to walk, or because they live alone and at a distance that prevent them from accessing information available in public places or near the sub-project sites, even though they might be adversely impacted by construction activities such as noise;
 - **People with disability** who may also be impaired from accessing information and yet be adversely impacted by Project activities if for instance these generate obstruction works on a road which would adversely impact people using wheelchairs or visually-impaired persons;
 - **Youth and children**, whose views may not be listened to but who may be adversely impact by Project activities such as increased traffic or community health and safety impacts; and
 - **Households deemed to reside below the poverty lines**, or whose income is significantly lower than the average income of their surrounding communities, that may be affected by the Project and therefore their income status could be further impacted.
 - **Individuals or households affected by land acquisition**, including those under customary land tenure systems, who may be particularly vulnerable due to unclear land rights or limited access to grievance mechanisms.

5.4 Stakeholder Interest and Influence

30. Analysis and Prioritization of Stakeholder Groups Based on Level of Interest in and Influence over the Project

Table 3 Summary of Project Stakeholder and their Role in the Project

Stakeholders who may directly or indirectly be involved with the Project	Role
Beneficiary Communities directly benefitting from the improved water supply and sanitation services.	Primary beneficiaries of improved water supply services; actively participate in consultations, provide feedback on service delivery, connection arrangements, and tariff acceptability.
Local community members are either temporarily or permanently adversely affected by project construction activities, land acquisition, etc.	Actively involved in the process of discussing project design, construction implications and manner in which they would be compensated for the temporary or permanent effect to their assets and livelihoods; engaged through grievance mechanisms and ongoing communication.
Communities located near water sources (e.g., springs) and water source custodians/owners	Key stakeholders in discussions related to water abstraction, protection of water sources, and culturally appropriate management of natural resources; require intensive engagement to avoid conflict.
Vulnerable, disadvantaged and relatively voiceless sections of the community including, women, landless, aging population, etc. need to be reached out to address their concerns.	To be reached out to, made fully aware of project design and operating considerations, construction-related impacts and their concerns and opinions proactively sought and incorporated as part of project design, as well as to be protected from disproportionate impacts.
Project workers (including contractors, subcontractors, and labor force)	Responsible for implementing project works; must comply with project codes of conduct, including SEA/SH requirements; key stakeholders in labor management and occupational health and safety.
Traditional leaders (Lian Na'in), Suco Councils, and community leaders	Play a central role in community decision-making, conflict resolution, and acceptance of the Project, particularly in relation to land, water sources, and local customs
The Municipality of Baucau	Support local coordination, facilitate community engagement, and assist in addressing local concerns and grievances.
Ministry of Public Works (MPW)	Project Implementing Agency responsible for overall policy guidance, coordination, and oversight.
Bee Timor Leste Empresa Pública (BTL, E.P.)	Project Management Unit (PMU) responsible for project implementation, stakeholder engagement, environmental and social risk management, and future operation of the water supply system.
Ministry of Justice (MoJ) and NDLPCS	Responsible for land administration, land acquisition processes, and resolution of land-related issues, including customary tenure.

Stakeholders who may directly or indirectly be involved with the Project	Role
Ministry of Health (MoH)	Supports public health aspects related to improved water access and hygiene outcomes.
Ministry of State Administration (MSA)	Supports coordination with local governments and administrative structures.
Ministry of Agriculture and relevant water resource authorities (e.g., DNRAS/ANLA)	Support water resource management and sustainability considerations for abstraction and use.
Project Steering Committee (PSC).	To provide overall policy guidance during Project preparation and implementation. It will coordinate interventions from various ministries and agencies in charge of water supply and sanitation development.
Development partners and International Organizations like World Bank, ADB, UNICEF, and Water Aid, etc.	Provide financial, technical, and capacity-building support, and contribute to sector knowledge and coordination.
Civil society organizations (CSOs), NGOs, and community-based organizations (CBOs)	Support community engagement, awareness raising, and social inclusion, particularly for vulnerable groups.
Religious institutions (including the Church)	Influential in community mobilization, awareness raising, and building social acceptance of the Project.
Veterans groups, police, and military representatives	Relevant for local governance dynamics, stability, and community relations, particularly in sensitive areas.
Private sector and local businesses	May be affected by construction activities and benefit from improved water services; potential partners in service delivery and local economic activities.

6. Stakeholder Engagement Program

31. The Stakeholder Engagement Program is a key component of this SEP and is designed to ensure inclusive, transparent, and continuous engagement with all stakeholders throughout the Project lifecycle. Effective engagement will support the achievement of project objectives, enhance social sustainability, and mitigate environmental and social risks.
32. The SEP will ensure meaningful participation of all stakeholder groups, including disadvantaged and vulnerable individuals who may face barriers to participation due to social, economic, cultural, or physical constraints. Targeted measures will be implemented to enable their effective inclusion.
33. Stakeholder engagement will be implemented as a dynamic and iterative process. Stakeholder interests, risks, and engagement needs may evolve over time, particularly in a context characterized by land acquisition, community expectations, and cultural sensitivities related to water sources. Therefore, this SEP will be periodically reviewed and updated throughout Project implementation

6.1 Purpose and timing of stakeholder engagement program

34. The Project will implement a structured and continuous engagement program with all relevant stakeholders throughout the Project lifecycle. The primary objectives of stakeholder engagement are to:
 - Provide timely, transparent, and accessible information about the Project;

- Enable stakeholders to express their views, concerns, and expectations;
 - Incorporate stakeholder feedback into project design and implementation where feasible;
 - Build trust and maintain constructive relationships with communities and institutions; and
 - Support mitigation of environmental and social risks, including those related to land acquisition, cultural practices, labor influx, and community health and safety
35. Given the “substantial” social risk profile of the Project, particular emphasis will be placed on engaging stakeholders affected by land acquisition, communities associated with water sources (e.g., springs), and vulnerable groups, as well as managing expectations related to employment opportunities and service delivery.
36. Stakeholder engagement activities will be implemented across the following key project phases:
- **Project Design and Finalization of Detailed Engineering Design (DED)**
Engagement will focus on validation of design options, identification of affected stakeholders (including landowners and water source users), and consultation on environmental and social instruments.
 - **Pre-Construction Phase**
Engagement will focus on land acquisition processes, compensation arrangements, disclosure of project impacts, and preparation of communities for construction activities.
 - **Construction Phase**
Engagement will be intensified in areas affected by civil works to address construction-related impacts (e.g., noise, dust, traffic disruption), worker-community interactions, SEA/SH risk mitigation, and grievance management.
 - **Operation Phase**
Engagement will focus on service delivery feedback, tariff awareness, affordability concerns, and long-term sustainability of water supply services.
37. The timing and frequency of engagement activities will be disclosed in advance and adapted to local conditions, ensuring accessibility for all stakeholder groups.

6.2 Engagement methods to be used

38. A combination of engagement methods will be used to ensure broad, inclusive, and culturally appropriate communication, taking into account stakeholder preferences in Baucau (including the preference for in-person consultations and use of Tetum language).
- **Public Consultations / virtual consultations.** Consultations have been and will continue to be organized during the project design stage and the project implementation. Public consultations will be organized for any updated/addendum RAP documents, as well as site specific ESIA and other ESF documents. Face-to-face consultations at municipal, suco, and aldeia levels will be the primary engagement method. These will involve community members, Suco Councils, traditional leaders (Lian Na’in), and other local stakeholders. Moreover, public consultations will be held on an ongoing basis as part of the community engagement process during the project cycle.
 - **Focused Group Discussion (FGDs).** Targeted discussions will be held with specific stakeholder groups, including women, vulnerable households, water source custodians, and affected landowners.
 - **Household-Level Engagement.** Direct engagement with households will be conducted, particularly for connection installation, land acquisition, and addressing concerns related to service access and affordability.
 - **Key Informant Interviews.** Interviews with government officials, traditional leaders, religious institutions, and sector experts will be conducted to inform project decision-making.

- **Information Materials (Leaflets, Posters, Notices).** Information will be disseminated through simple, visual materials in Tetum, distributed through community meetings, churches, schools, and health centers.
- **Information Boards and Signage.** Information boards will be installed at project sites and public locations with updates on project activities, timelines, and grievance channels.
- **Digital Platforms and Communication Channels.** BTL's digital platform (www.btl.tl), SMS, and telephone communication will be used to complement face-to-face engagement where feasible.
- **Grievance Redress Mechanism (GRM).** A project-specific GRM will be established in line with ESS10. Multiple intake channels will be provided, including in-person, phone, SMS, and online submissions. Anonymous complaints will be accepted. The GRM will include measures to handle sensitive complaints, including SEA/SH-related grievances.
- **Engagement with Project Workers.** Regular engagement sessions with contractors and workers will be conducted to reinforce Code of Conduct requirements, including SEA/SH prevention and community interaction protocols.
- **Letters.** The letters will be an instrument used in order to facilitate the Project implementation process through good collaboration between the implementing entities and other stakeholders.
- **Reports.** The reports will be used to monitor the Project implementation and to keep informed the main stakeholders of the Project.

6.3 Proposed strategy for information disclosure

39. The methods of the information disclosure will vary according to the target group as follows:

- Regular meetings with government – central, and district/municipal;
- Community-level meetings and facilitation through local leadership structures (including Suco Councils and traditional leaders);
- Public information dissemination and disclosure (i.e. through local media, information boards, village representatives and/or leaders);
- Direct engagement with affected individuals and households
- Interview with representatives of local communities and organizations;
- Public meetings (in municipality, suco, aldeia), and workshops with civil society organizations, development partners, and relevant institutions.

40. Information disclosure formats will also vary according to the requirements from the government, i.e. as per requirements of ANLA for disclosure of SEIS and EMP and other environmental documents. The requirements include public consultation of the draft SEIS and EMP and endorsement from the implementing agency (Ministry of Public Works) for the disclosure of the the final version of the documents. Disclosure of the environment documents will be in an appropriate form, manner, and language and at an accessible location to be understood to the affected people and local stakeholders and also to be publicly disclosed by GoTL including posting on WB's website.

41. Public information materials to enable wider access to project information, as well as progress, will be developed during project implementation. The materials referred to are: (i) the booklet, (ii) big size banners, (iii) project status summary sheet. The booklet will be prepared when we disclosed land map, government resolution on compensation packages. The banners is when the project will share information on warning signs or information regarding hotline call centre. Project status summary will be shared on BTL, E.P. website. Stakeholders' communication and consultation preferences, particularly those of target communities will also be carefully assessed to promote greater participation and social inclusion.

42. Table 5 below provides a preliminary summary of the information to be disclosed to stakeholder groups. As this document is a living document that will be updated as the Project progresses, the following Tables described in this Chapter are to be considered as an evolving tool and will be updated at any point during project preparation and implementation. Some of the proposed information in this current document may be removed by the Project if no longer considered relevant.
43. All project-related information will be disclosed in Tetum and forms accessible to target communities and the wider public. Communities will retain the right to ask for information about the status of the Project, their entitlements, eligibility criteria as well as responsibilities, and the GM channels will be made accessible for the communities.

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Table 4 Proposed Strategy for Information Disclosure

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Project Design / Finalization (DED)	Updated project scope, design options, environmental and social instruments (SEP, RAP, LMP, SEIS/EMP), identification of affected stakeholders	Public consultations (suco/aldeia level); focus group discussions (FGDs); meetings with traditional leaders (Lian Na'in); information materials (leaflets, posters); BTL website	During design finalization and prior to appraisal	Affected communities; landowners; water source users; vulnerable groups; local authorities	PMU (BTL), MPW, ES Consultants
Project Pre-Construction	Procurement and Open Bid Announcement	Online platform; Mass media; Project and Company website	Following the finalization of the Bidding Document	General Public	PMU
Project Pre-Construction	Land acquisition processes, eligibility and compensation, construction schedule, expected impacts (noise, dust, traffic), mitigation measures, GRM (including SEA/SH reporting channels)	Community meetings; household visits; FGDs with affected landowners; public disclosure via information boards; local leaders engagement; BTL website	Prior to land acquisition and before commencement of works	Project affected households; customary landowners; vulnerable groups; Suco Councils; traditional leaders	PMU (BTL), Contractors, ES Consultants
Project Pre-Construction	Construction Schedule and socialization of ES Risks and prevention/mitigation (i.e. from land clearing and heavy equipment mobilization); traffic management plans; temporary service disruptions; health and safety measures; SEA/SH Code of Conduct and awareness; hiring procedures	Public consultations; information boards at worksites; community meetings; SMS/phone notifications; engagement through local leaders; grievance channels	Following the finalization of the Construction Schedule and HIRADC document	All affected communities; All Project Workers; Relevant Government Authorities; vulnerable groups	ES Consultant, Contractor, PMU

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Project Construction	Site-specific impacts and mitigation measures (e.g., excavation, road use, noise, dust)	Public Consultation; Project website; Periodic meeting; Bulletin board; Direct engagement with nearby households	Prior to each activity that may impact the communities	All affected communities; All Project Workers; Relevant Government Authorities; local businesses; vulnerable groups	ES Consultant, Contractor, PMU
Project Construction	Grievance Mechanism Procedure (including the introduction of the responsible party from the Contractor & PSC) and anonymous reporting channels and SEA/SH- sensitive procedures	Public Consultation; Project website; Periodic community meeting; Bulletin board; hotline/phone/SMS;	Prior to Construction and throughout the project duration.	All affected communities; All Project Workers; All stakeholders	ES Consultant, Contractor, PMU
Project Operation	Socialization of Project Operation, including Water service connection procedures, tariffs, billing, and grievance procedures	Public Consultation; Project website; Bulletin board; Community outreach; Leaflets; help desk/customer service;	Prior to commissioning and early operation phase	General Public; Beneficiary households; Vulnerable groups.	BTL (Operator), PMU
Project Operation	Service performance updates, planned maintenance, service interruptions	Customer communication (SMS, phone, website); community meetings; notice boards	Periodic (as needed during operation)	General Public; Beneficiaries	BTL (Operator), PMU

Table 5 Proposed Strategy for Consultation

Project stage	Topic of consultation	Method Proposed	Timetable: Location and dates	Target stakeholders	Responsibilities
Project Design / Finalization (DED)	Project design, water source selection, impacts on communities, environmental and social risks, validation of ES instruments (SEP, RAP, LMP, SEIS/EMP)	Public consultations (suco/aldeia level); FGDs; meetings with traditional leaders (Lian Na'in); key informant interviews; community meetings	During DED finalization and prior to appraisal	Affected communities; water source users/custodians; landowners; vulnerable groups; Suco Councils; local authorities	PMU (BTL), MPW, ES Consultants
Project Pre-Construction	Land acquisition process; compensation and eligibility criteria; livelihood restoration; rights of affected persons; GRM procedures (including SEA/SH reporting); cultural considerations related to land and water sources	Public consultations; FGDs with affected households; household visits; meetings with traditional leaders; community meetings	Prior to the land acquisition activities and before commencement of works	Project-affected households; customary landowners; vulnerable groups; Lian Na'in; Suco Councils; relevant government agencies (NDLPCS, MoJ)	PMU (BTL), Contractors, ES Consultants
Project Pre-Construction	Construction schedule; anticipated impacts (noise, dust, traffic); mitigation measures; community health and safety	Community meetings; public announcements; information boards; coordination meetings with local leaders	Prior to the commencement of the Construction	Affected communities; local businesses; vulnerable groups; municipal authorities	PMU, Contractor

Project stage	Topic of consultation	Method Proposed	Timetable: Location and dates	Target stakeholders	Responsibilities
Project Pre-Construction	Local recruitment process; labor requirements; code of conduct; equal opportunity and non-discrimination principles	Community briefings; meetings with local leaders; public notices; BTL platform	Prior to Construction activities	Local communities; job seekers; youth; vulnerable groups	Contractor; PMU (incl. HR officer),
Construction	Construction progress and activities; temporary disruptions (traffic, access, noise); safety measures; mitigation actions; SEA/SH awareness; GRM access	Regular community meetings; FGDs; engagement through Suco Councils and Lian Na'in; information boards at sites; direct household engagement	Throughout construction phase (regular/ongoing)	Affected communities; nearby households; vulnerable groups; local authorities	Contractors, PMU (BTL)
Construction	Worker-community interaction; code of conduct; labor behavior expectations; SEA/SH prevention measures	worker meetings; community awareness sessions	Throughout construction phase	Project workers; nearby communities	Contractors, PMU
Construction	Site-specific high-impact activities (e.g., excavation, road works, water supply disruptions) and mitigation measures	Site-level meetings; direct engagement with affected households; advance notice to communities	Prior to specific high-impact activities	Adjacent communities; local businesses; vulnerable groups	Contractors, PMU
Operation	Water service connection procedures; tariff structure; affordability considerations; billing; grievance procedures	Public consultations; community outreach; leaflets; help desk/customer service; BTL platform	Prior to commissioning and early operation	Beneficiary households; vulnerable groups; general public	BTL (Operator), PMU
Operation	Service quality, maintenance, planned service interruptions, customer feedback	Community meetings; customer communication (SMS/phone/website); periodic consultations	During operation (periodic)	Beneficiaries; general public	BTL (Operator)

6.4 Proposed strategy to incorporate the view of vulnerable groups

44. The Project will adopt targeted and inclusive strategies to ensure that disadvantaged and vulnerable groups are able to meaningfully participate in stakeholder engagement processes and that their views are adequately reflected in project design and implementation.
45. Engagement with vulnerable groups will include:
- Conducting focused group discussions (FGDs) in locations and at times convenient and accessible to vulnerable groups;
 - Undertaking household-level visits and direct outreach, particularly for individuals with limited mobility or restricted access to public meetings;
 - Facilitating discussions through trusted local structures, including Suco Councils and traditional leaders (Lian Na'in), where appropriate;
 - Ensuring the use of Tetum and culturally appropriate communication methods;
 - Providing safe and confidential channels, particularly for sensitive issues such as SEA/SH; and
 - Engaging women and other vulnerable groups in separate consultations where needed to ensure that their voices are heard without constraints
46. Particular attention will be given to women, elderly persons, persons with disabilities, low-income households, and individuals affected by land acquisition, as well as those who may face increased exposure to risks related to project-worker interactions during construction.
47. The approach to engaging vulnerable groups will be continuously refined throughout the Project lifecycle, based on feedback received and evolving project conditions. Vulnerable groups will be engaged at all key stages of the Project, including design, pre-construction, construction, and operation. A summary of consultations done in 2020-2021 and again in 2026 with vulnerable groups and key feedback is provided in Table 6 below

Table 6 Vulnerable Groups Consultation

No	Group engaged	Topic	Feedback and question	Answer
1	Women groups	Willingness to pay and water use	We need to manage the water because the water is very important for all people; people know how to manage it specially women. For instance we buy \$2 of electrical credit to support us in fill up our water tanks because it seems like we manage our deposit for having water to use for a long time not even depend on Water Taps every day. \$0.25/day for 1,000 liters of water is the preferred cost.	This preferred unit cost will be considered for future water utility's operation and maintenance stage.
3	Farmer group	Water sources capacity	It is necessary to identify other water sources that exist in Baucau, because water sources in Uailia have decreased.	Currently field work is planned for Baucau in order to ascertain potential water sources Tests has been conducted and the

No	Group engaged	Topic	Feedback and question	Answer
				report is included in the DED
4	Farmer group	Social impact	How are you preparing to handle social problems in the future implementation period?	<p>Environmental & Social tools will be prepared and implemented throughout the project implementation in order to tackle any issues that arise.</p> <p>Currently all of the previously Social safeguards tools prepared by the DED consultant are being updated to align with the WB's ESF.</p>
5	Women groups and affected households (AHs)	Project update, water source change, and participation (<i>consultation in 2026</i>)	Concerns were raised regarding the change of water source from Siri Mana-Mana to Uai-Sarake, particularly as the spring is currently used by the community. Women participants also highlighted the importance of being informed and involved throughout the project cycle.	<p>The PMU explained that feasibility studies have been conducted confirming the adequacy of the selected sources. It was clarified that the Project will use multiple water sources (including Uailia Mata, Uailia Bere, and Uailewa), and only part of the Uai-Sarake flow will be abstracted. The</p> <p>PMU also committed to continued inclusive engagement and communication throughout the Project.</p>
6	Water-stressed communities (e.g., Samalakuliba and Afagua)	Access to water services (<i>consultation in 2026</i>)	Representatives expressed strong support for the Project, highlighting ongoing challenges in accessing clean and reliable water. They noted that improved water supply is urgently needed to support daily living conditions.	<p>The Project confirmed its objective to improve access to safely managed water supply for all target communities. The installation of household connections and improved system reliability are expected to address these constraints.</p>

6.5 Future Phase of Project

48. Stakeholders will be kept informed as the project develops, including in the reporting on the Project's environmental and social performance and implementation of SEP and GRM. Periodic reports (at least on annual basis) will be made available to the stakeholders, with more frequent reports to be made during an active period of the Project when the community may experience more impacts or prior to the commencement of the next Project's stage (the Operation and Maintenance stage). Documentation and information on the update of Project activities and the result of consultation with stakeholders will also be published by PMU in the following locations: PMU office - Ministry of Public Works, Dili, Timor-Leste, and Ministry of Finance website: <https://www.mof.gov.tl>

7. Grievance Redress Mechanism

7.1 Objective

49. The Ministry of Public Works (MPW), through Bee Timor Leste Empresa Pública (BTL, E.P.) as the Project Management Unit (PMU), will establish and operate a Project-level Grievance Redress Mechanism (GRM) to receive, evaluate, and address project-related complaints in a timely, transparent, and culturally appropriate manner.
50. The GRM will address grievances related to environmental, social, land acquisition, labor, community health and safety, and gender-related issues, including Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). The mechanism will be accessible to all stakeholders, including project-affected persons, beneficiaries, project workers, and vulnerable groups
51. The objectives of the GRM are to:
- Provide an accessible and inclusive platform for stakeholders to raise concerns or complaints;
 - Ensure that grievances are addressed promptly and fairly;
 - Strengthen trust and transparency between the Project and stakeholders; and
 - Identify and resolve issues early to prevent escalation.
52. The GRM will include multiple intake channels (in-person, phone, SMS, and online) and will allow **anonymous submissions**. The mechanism will be designed to ensure accessibility for vulnerable groups and will include provisions for confidential handling of sensitive complaints, particularly SEA/SH-related grievances.
53. While the Project will utilize and coordinate with existing grievance mechanisms at the community and institutional levels (e.g., Suco Councils, traditional leaders, and relevant government entities), the Project GRM will operate as a dedicated system to ensure consistent and timely resolution of project-related complaints. The PMU will serve as the central focal point for managing and monitoring grievances.

7.2 GRM Structure and Institutional Arrangements

54. A Project Grievance Redress Committee (GRC) will be established to oversee grievance resolution, ensure impartial review of cases, and support coordination across relevant stakeholders.
55. The GRC will include representatives from:
- BTL (PMU) – including Environmental, Social, and Gender Specialists
 - Contractor(s)

- Municipal authorities
 - Local authorities (including Suco Chiefs and, where appropriate, traditional leaders such as Lian Na'in)
 - Relevant government agencies (e.g., Ministry of Justice/NDLPCS for land-related grievances)
 - Service providers or referral partners for SEA/SH cases
56. The composition of the GRC will ensure gender balance, and female members will be included in all cases involving female complainants. Where necessary, separate and confidential procedures will be followed for sensitive grievances.
57. The GRC will function as a decision-support body, while the PMU will remain responsible for day-to-day management of the GRM, including receiving, registering, tracking, and reporting grievances.

7.3 GRM Operation and Responsibilities

58. The PMU will designate GRM focal points at both central and municipal levels to ensure accessibility to communities in Baucau. These focal points will:
- Receive and register grievances;
 - Acknowledge receipt of complaints in a timely manner;
 - Coordinate investigation and resolution;
 - Ensure communication of outcomes to complainants; and
 - Maintain records and report on GRM performance.
59. Contractors will also be required to maintain site-level grievance intake mechanisms and coordinate closely with the PMU to ensure proper documentation and resolution of complaints related to construction activities and workers.
60. The GRM will cover three broad categories of grievances:
- Environmental and safety issues (e.g., dust, noise, traffic, construction impacts);
 - Social issues, including land acquisition, access, community disputes, and labor conditions; and
 - Sensitive grievances, including SEA/SH, which will be handled through confidential and survivor-centered procedures with referral to appropriate service providers.
61. For land-related grievances, the Project will coordinate with the Ministry of Justice (MoJ) and the National Directorate of Lands, Properties and Cadastral Services (NDLPCS), while ensuring that Project-level processes remain accessible and responsive.
62. For sensitive cases, particularly SEA/SH, the GRM will ensure:
- Confidential handling and survivor-centered approach;
 - Multiple safe reporting channels;
 - Referral pathways to qualified service providers; and
 - No requirement for survivors to use formal project grievance procedures if they prefer external support.

7.4 Interim Arrangements

63. In the event that the full GRM is not operational at the early stages of Project implementation, the PMU will establish an **interim GRM arrangement** to manage grievances.
64. During this period, designated BTL representatives at the municipal level (Baucau) will act as GRM focal points and will ensure that grievances are received, documented, and escalated to the PMU for resolution.
65. The interim GRM will follow the same principles of accessibility, transparency, confidentiality, and timely response as the full GRM.

7.5 Grievance Redress Process

66. Table 7 below presents the grievance redress process which is compliant with the mechanism envisaged in the agreed 2019 RPF of the Project, Expropriation Law (No.8/2017) and Land Law (No. 13/2017), as well as the World Bank Environmental and Social Framework (ESS10).

Table 7. Grievance Redress Process

Step	Process	Duration
1. Grievance Intake	PAPs submit his/her grievance in person, via phone call, or via complain box to the GRM operator and will proceed to database checking. Anonymous submissions are accepted.	Within 1 working day
2. Acknowledgment and Registration	The complainant receives confirmation that his/her grievance has been received. The grievance is entered in the database using a grievance registry form, and assigned to a focal point for follow-up..	Within 2 working days
3. Screening and Assessment	The grievance is reviewed and categorized (environmental, social, land, labor, SEA/SH). An appropriate resolution pathway is determined. Where necessary, meetings with the complainant and relevant stakeholders (including local leaders such as Suco Chiefs or Lian Na'in) are conducted. Minutes are recorded and added to the grievance database	Within 5 working days
4. Resolution and Escalation	<p>Resolution & Complainant Satisfaction</p> <p><u>Project Level Resolution</u></p> <p>Grievance focal points and its related department will provide solution to the grievance and discussed it with the PSC Manager for final approval.</p> <p>If resolution is agreed (Yes); The process concludes with a written agreement signed by the complainant(s) and PSC manager</p> <p>If unresolved (No); or at any stage if PAP is not satisfied the grievance will be escalated to higher level</p>	Within 14 working days
	<p><u>Management Level Resolution:</u></p> <p>ESU and the Technical unit within the PMU will provide solution to the grievance and discussed it with the PMU manager for final approval.</p>	

	<p>If resolution is agreed (Yes); The process concludes with a written agreement signed by the complainant(s) and PMU manager</p> <p>If unresolved (No); or at any stage if PAP is not satisfied the grievance will be elevated to next level</p>	
	<p><u>Ministry Level Resolution</u></p> <p>PMU and the MPW coordinator refers the matter to the designated government offices (DGPW, Land Dept., Agriculture Dept., Housing Dept. & MoF – Loan Unit)</p> <p>If resolution is agreed (Yes); The process concludes with a written agreement signed by the complainant(s) and Minister of MPW</p> <p>If unresolved (No); or at any stage if PAP is not satisfied the grievance will be elevated to next level</p>	<p>Within 30 working days</p>
<p>5. Judicial Resolution (if needed)</p>	<p>If unresolved, the complainant retains the right to refer the case to the formal judicial system. The Project GRM does not impede access to legal remedies</p>	<p>As per national legal procedures</p>

66. SEA/SH-related grievances will NOT follow the standard process above. They will be handled confidentially, through survivor-centered approach, and with referral to specialized service providers.

67. The PMU will keep a record of grievances received, including names and pertinent information about the PAPs, nature of the complaints, dates the complaints are lodged, and resolution of the same. Grievances not resolved will also be recorded, detailing negotiations and proposals which could not be agreed on, and the dates these negotiations took place.

68. At any stage in the GRM, the complainant may have the option to elevate the complaint to authorized local courts for litigation following the rules of court. During the litigation of the case, the Government will request from the court that the project proceed without disruption while the case is being heard. If any party is dissatisfied with the ruling of the civil court, that party can elevate the case to a higher court. The Government shall implement the decision of the court. The project-level GRM should not impede access to the country's jurisdiction or administrative remedies. There are no charges or fees levied to the PAPs for the lodgement and processing of complaints.

7.6 GRM Record Keeping

69. All complaints should be recorded in a log system and will be maintained as a database. The log system consists of the following information: (i) Number reference to database, (ii) Name of project, (iii) Name of contractor, (iv) Name of the complainant, (v) Spouse name, (vi) Address and phone, (vii) Occupation, (viii) Date of birth, (ix) Date and time of receipt of complaint, (x) Name of person recorded the case, (xi) Category of complaint, (xii) Type of action, (xiii) Status of grievance process (delegate, fact finding, appeals, settlement, close, unable to complete, (xiv) Delegated units (and responsible staff) as necessary, (xv) Status of final report, (xvi) Status of providing information to the complaining party, and (xvii) Feedback status of a person who is complaining.

70. For confidential or anonymous complaints, including SEA/SH cases, identifying information will not be recorded, and data will be managed with strict confidentiality.

71. A summary of this information will be included in the quarterly/biannual monitoring reports which will be submitted to the World Bank. Key information to be provided include (i) number of grievances received; (ii) types of grievances; (iii) resolution rates and timelines; and (iv) key trends and lessons learned.

8. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

72. The Project Management Unit (PMU) will engage and work with stakeholders to build and maintain constructive coordination/relationships. All PMU members are representatives of the PMU staff.
73. An Environmental and Social (E&S) Focal Point will be appointed by the PMU to ensure the effective implementation of the Stakeholder Engagement Plan (SEP). The E&S Focal Point will be responsible for coordinating stakeholder engagement activities, facilitating communication with stakeholders, and ensuring that engagement activities are carried out in accordance with the SEP.
74. The implementation of the SEP will be financed under the Project, primarily through the component on Project Management and Supervision. The PMU will be responsible for overall coordination (including with the Steering Committee), problem-solving, and ensuring compliance with the World ESF.
75. The PMU will work and communicate with the District/Municipal authorities, contractors, local leaders (including Suco Councils and, where appropriate, traditional leaders such as Lian Na'in) and other stakeholders and will use it to:
 - a) Deliver the latest information and keep stakeholders/community informed of the progress;
 - b) Deliver the information to stakeholders about the complaints mechanisms and procedures described in this SEP
 - c) Consult with the interest groups and ensure that consultation is inclusive and can be accessed both in format and location according to the group characteristics.
 - d) Ensure that stakeholder feedback is documented and incorporated into Project implementation where appropriate.
76. Contractors will support stakeholder engagement at the site level, particularly during construction, including community outreach, information disclosure, and operation of site-level grievance intake points. Contractors will coordinate with the PMU to ensure consistency with the SEP.
77. The PMU will ensure that sufficient human and financial resources are allocated for the effective implementation of stakeholder engagement activities throughout the Project lifecycle. The indicative budget for stakeholder engagement will be included under project implementation costs and reviewed periodically.
78. The tentative budget for implementing the stakeholder engagement plan will be described under the Component 3 of the ESF implementation. Table 7 below provides an overview of the previous stakeholder engagement plan budget (for over than 3 years period) in another similar sub-project.
79. Based on this previous sub-project, the stakeholder engagement activities covered a variety of social issues that were also part of other project documents, so it has also been budgeted in other plans. PMU will conduct a periodic review (every six months) of the developed budget, to determine if any changes to stakeholder classification or engagement are required. If so, the budget plan will be updated, and a new revision distributed.

Table 6 Overview of the Financing Needs, taken from previous similar Sub-Project

Component	Expenditure Items	Qty	Unit Cost (US\$)	Months	Total cost (US\$)
3	Recruitment of Specialist and Facilitators				
	Community Engagement Specialist (Intl)	1	13,000	6	78,000
	Community Facilitator-1 (Nat'l)	1	2,000	22	44,000
	Community Facilitator-2 (Nat'l)	1	2,000	12	24,000
2 & 3	Stakeholder engagement and community awareness materials and campaign				
	Communication materials (leaflets, posters, PR kits including design)	LS			2,000
	Project press conferences (twice per year)	3	1,500		4,500
	Public consultations at the national level	2	3,000		6,000
	Public consultations at the district level	3	1,500		4,500
	Public consultations at the suco level	10	300		3,000
3	Capacity building on community engagement for PMU/MPW – Environment and Social Safeguard Officer				
	Training (Social issues, outreach, GM, etc.)	6	1,500		9,000
3	GM operationalization				
	Suggestions / GM boxes (PMU, Municipality, Administrative Post and Suco)	10	100		1,000
	MIS/GM database (including mobile application with online and offline uploads)	Lump sum			50
	GM Meetings	Lump sum			1,000
Total					176,000

9. Monitoring and Reporting

80. Monitoring of Stakeholder Engagement implementation will be conducted to review the effectiveness of the performed strategy of engagement and to provide input to the next Stakeholder Engagement activity.
81. The E&S Focal Point will be responsible for documenting the implementation of the SEP, including recording stakeholder engagement activities and compiling relevant information for reporting purposes. This will include:
- Date and location of engagement activities;
 - Type of engagement (e.g., public meetings, FGDs, household visits);
 - Stakeholder groups engaged (including vulnerable groups); and
 - Summary of key issues raised and responses provided.
82. The information collected by the E&S Focal Point will be used to prepare inputs to the Project's Environmental and Social (E&S) Progress Reports.
83. The PMU Coordinator will be responsible for overseeing the quality of monitoring and reporting and ensuring that accurate and complete information on stakeholder engagement is incorporated into the Project's E&S Progress Reports

84. Stakeholder engagement activities and outcomes will be compiled into regular reports (quarterly or biannual) and submitted to the World Bank as part of environmental and social performance reporting, including GRM performance as well as reported to the Ministry of Public Works.

9.1 Involvement of stakeholders in monitoring activities

85. Stakeholders, including community representatives, local authorities, and civil society organizations, will be involved in monitoring Project implementation where appropriate. This may include participation in consultation meetings, feedback sessions, and monitoring visits.

86. The E&S Focal Point will track commitments made during consultations and ensure that follow-up actions are implemented. This includes monitoring any changes resulting from updates in project design, stakeholder needs, or SEP implementation

87. Where necessary, the Project may engage independent third parties (e.g., NGOs or consultants) to support monitoring of stakeholder engagement activities, particularly in view of the Project's substantial social risk and the complexity of stakeholder interactions.

9.2 Reporting back to stakeholder groups

88. Results from stakeholder engagement activities will be reported back to stakeholder groups through potential engagement channels such as Project website, bulletin board or other online platforms. Timeline for the first reporting back to stakeholder groups will be updated after the initial consultation being held.

89. Reporting back to stakeholders will include:

- Summary of issues raised during consultations;
- Actions taken or proposed in response;
- Status of grievance resolution (in aggregated form); and
- Updates on Project progress and key milestones.


90. Reporting will be conducted on a regular basis, particularly during active phases of the Project (e.g., construction) and after major consultation activities

91. Special efforts will be made to ensure that vulnerable groups receive feedback in accessible formats and through appropriate channels, including direct outreach where needed.

ANNEX 1: Grievance Redress Mechanism Forms

Complaints Registry Form

Note: Name and address of the complainant can be left blank for anonymous grievances

 Democratic Republic of Timor-Leste BEE TIMOR-LESTE E.P. Ministry of Public Works	
COMPLAINT REGISTRY FORM	
DATE: ____/____/____ (dd/mm/yy)	CRF: 001
Complaint Category: _____	
<u>COMPLAINANT PROFILE</u>	
Name : _____	Age : _____
Gender : <input type="checkbox"/> Male <input type="checkbox"/> Female	Civil Status : <input type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Widow/er
Address	_____
Aldeia	_____
Suco	_____
Administrative Post	_____
<u>Complaint Details</u>	
Attending Officer:	
Name/Designation	Complainant Signature

Notes:

Category 1 Social Issues

Category 2 Environmental Issues

Category 3 Complaints related to violations of policies, guidelines, and procedures

- Category 4 Complaints related to breach of contract Complaints regarding misuse of funds/lack of transparency, or other financial*
- Category 5 Management problems*
- Category 6 Complaints related to abuse of power/intervention by the project or government*
- Category 7 Complaints regarding staff performance*
- Category 8 Force majeure report*
- Category 9 Complaints about Project intervention*
- Category 10 Others*

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Complaints Investigation Form

Notes: Consent from the complainant on disclosure of the grievance information (incl. to third parties) shall be received prior to conducting the investigation activities.

Grievance ID	Brief Description and Category of Grievance	Personnel/Department in Charge	Targeted timelines	Investigation Status
<i>[Fill in name/ID of grievance and the status (open or close) and date]</i>	Category: Related Activity: Location: Source:	<i>[Name and signature of person/department in charge of handling the grievance]</i>	Investigation date: Discussion with complainant date: Close out date:	<i>[Mark with open or close following the timeline dates]</i>
<p><u>Investigation</u></p> <p>Direct Cause of Grievance:</p> <p>Root Cause Analysis:</p>				
<p><u>Follow Up:</u></p> <p>Action Plan:</p> <p>Result at the Close Out Date: <i>[closed or remain open/requires additional investigation]</i></p>				
<p>Date and Signature of Involved Parties [after considered as Closed]</p> <p> <i>[Complainant]</i> <i>[Investigation officer/team representative]</i> <i>[Project Coordinator/GRM Officer]</i> </p>				