

# Baljuvon – Sari Khosor Road Project ESIA

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Stakeholder Engagement Plan, April 2026



Vista  
Environment

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## Acronyms and Abbreviations

Acronym	Meaning
AP	Affected Person
BSK	Baljuvon – Sari Khosor
CEP	Committee for Environmental Protection (under the Government of Tajikistan)
CESMP	Construction Environmental and Social Management Plan
CSC	Construction Supervision Consultant
CSO	Civil Society Organization
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMPF	Environmental and Social Management Plan Framework
ESR	Environmental and Social Requirement (EBRD)
FGD	Focus Group Discussion
FP	Focal Person
GBVH	Gender-Based Violence and Harassment
GIIP	Good International Industry Practice
GoT	Government of the Republic of Tajikistan
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
IEE	Initial Environmental Examination
IPAM	Independent Project Accountability Mechanism (EBRD)
IUCN	International Union for Conservation of Nature
LAR	Land Acquisition and Resettlement
LARP	Land Acquisition and Resettlement Plan
LMP	Labour Management Procedures
MDB	Multilateral Development Bank
MoT	Ministry of Transport of the Republic of Tajikistan
NGO	Non-Governmental Organization

Acronym	Meaning
NP	National Park
OHS	Occupational Health and Safety
PDF	Portable Document Format
PIURR	Project Implementation Unit for Roads Rehabilitation
PR	Performance Requirement (EBRD)
PwD	Persons with Disabilities
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SES	Socio-Economic Survey
SMS	Short Message Service
SPS	Safeguard Policy Statement (ADB)
TOR	Terms of Reference
WWF	World Wide Fund for Nature

## I. Introduction and Background

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### 1.1. Background

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to the Republic of Tajikistan for the upgrade of the Baljuvon–Sari Khosor (BSK) road section. The Project Implementation Unit for Roads Rehabilitation (PIURR) under the Government of Tajikistan will act as the implementing agency.

The Project involves upgrading approximately 56 km of an existing unpaved road to a two-lane Category V standard to enable year-round access, improve safety, and enhance connectivity between settlements and regional markets.

The Project has been categorised as Category A under the EBRD Environmental and Social Policy (2024), requiring a full Environmental and Social Impact Assessment (ESIA) and meaningful stakeholder engagement throughout the project lifecycle.

### 1.2. Project Components

The BSK Project involves the upgrade of approximately 56 km of an existing unpaved and seasonally inaccessible road to a two-lane Category V standard. Key components include rehabilitation of the existing alignment; construction of paved carriageway, shoulders, drainage structures, culverts, and bridges; slope stabilization and erosion protection in mountainous sections; installation of road safety features and signage; and establishment of temporary construction facilities such as camps, borrow areas, material stockpiles, and access roads. The Project also includes ancillary activities required for construction and operation, including traffic management, utility coordination, and environmental and social mitigation measures. These components will be implemented in a manner designed to maintain access for local communities and minimize disruption during construction.

### 1.3. Project Objectives

The Project's primary objective is to provide a safe, reliable, and year-round road connection between Baljuvon district and the Sari Khosor area, improving mobility for local communities and strengthening regional connectivity. The upgraded road is intended to enhance access to essential services such as healthcare, education, and markets; improve road safety and reduce travel times; support local economic development, including agriculture and tourism; and increase climate resilience of transport infrastructure in a mountainous and hazard-prone area. The Project also aims to align with national development priorities and international lender requirements by integrating environmental and social risk management, meaningful stakeholder engagement, and inclusive development principles throughout the project lifecycle.

### 1.4. Purpose and Scope of the Stakeholder Engagement Plan (SEP)

The purpose of the Stakeholder Engagement Plan (SEP) is to outline the key stakeholders of the Project for all phases and to identify the methods of stakeholder engagement and establishment of constructive dialogue between the parties, and to introduce responsibilities in the implementation of stakeholder engagement activities. The SEP ensures broad and active stakeholder participation and establishes a constructive dialogue atmosphere in a timely manner during the project development process. Specifically, the SEP serves the following purposes:

- stakeholder identification and analysis;
- planning how the engagement with stakeholder will take place;
- disclosure of information;
- consultation with stakeholders;





- addressing and responding to grievances;
- monitoring and reporting on SEP.

This SEP is prepared in accordance with EBRD Environmental and Social Requirement 10 (ESR10). The scope and level of detail of the SEP will be scaled to fit the needs of the Project and the objectives of EBRD ESR10.

### 1.5. Structure of the SEP

The SEP is organized into sections that align with the requirements of EBRD ESR10. The structure ensures that all elements of stakeholder engagement- from identification through monitoring - are clearly defined and operational.

The SEP is structured as follows:

1. Introduction and Background – The section in hand.
2. Summary Description of the Project – Provides an overview of activities that will trigger further consultation and disclosure.
3. Stakeholder Identification and Analysis – Defines categories of stakeholders (affected parties, other interested parties, and disadvantaged/vulnerable groups), maps their interests and influence, and presents a stakeholder mapping matrix.
4. Institutional Analysis – Examines the roles, responsibilities, and expectations of key institutional stakeholders, including national ministries, municipal authorities, and multilateral development banks.
5. Planned Stakeholder Engagement Activities – Details the methods, timing, and frequency of engagement with each stakeholder group, including tailored approaches for vulnerable groups. Sets out inclusive measures such as women-only focus groups, accessible venues, and SEA/SH-sensitive engagement practices.
6. Stakeholder Engagement to Date – Describes the status of stakeholder engagement to date and planned consultations. It summarizes consultations undertaken to date, including findings from site visits, household surveys, and initial community discussions. Highlights key community concerns and priorities identified in the project area.
7. Grievance Redress Mechanism (GRM) – Describes the community and worker GRMs, including channels, service standards, survivor-centered SEA/SH pathways, and linkages to EBRD Independent Project Accountability Mechanism (IPAM).
8. Information Disclosure – Outlines the documents and information that will be disclosed, in what language(s), through which channels, and at what points in the project cycle.
9. Resources and Responsibilities – Sets out the roles of the Project Implementation Unit (PIURR), contractors, and social specialists, along with the budget and logistics needed for engagement activities.
10. Monitoring and Reporting – Defines indicators for monitoring the effectiveness of stakeholder engagement (e.g., number of consultations, GRM performance, participation of vulnerable groups), roles for data collection, and reporting commitments.
11. Annexes – Include supporting information such as consultation records, stakeholder comments and response matrices ("You Said / We Did"), sample GRM forms, and survey results.



## 2. Summary Description of the Project

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### 2.1 Project Activities

The BSK Project is a road rehabilitation and upgrade initiative located in Baljuvon district of Khatlon Region, Republic of Tajikistan. The Project follows an existing earth and gravel road alignment that currently provides limited and unreliable access, particularly during winter months and periods of heavy rainfall. Due to poor road conditions, landslides, mudflows, and snow accumulation, many settlements along the corridor experience seasonal isolation and constrained access to services, markets, and administrative centers.

The Project will upgrade the road to a two-lane Category V standard, enabling year-round traffic and improved safety for all road users. Works will largely be confined to the existing right-of-way, with localized widening, slope stabilization, and drainage improvements where required by terrain and safety considerations. Bridges and culverts will be rehabilitated or replaced to improve hydrological performance and reduce flood-related disruptions. Road safety measures such as signage, markings, and protective structures will be installed, particularly near settlements, schools, and areas of pedestrian activity.

Construction activities will be carried out in phases and are expected to include earthworks, pavement construction, operation of borrow areas and material processing facilities, transport of construction materials, and establishment of temporary worker camps and storage areas. These activities may result in temporary impacts such as increased noise, dust, traffic disruption, and restricted access near work sites. As such, the Project will require careful coordination with affected communities, road users, and local authorities, supported by clear communication, advance notice of works, and responsive grievance management.

The Project area includes approximately seventeen settlements located along or near the road corridor, ranging from small rural communities to larger village centers. While the alignment generally bypasses dense settlement cores, certain sections pass close to residential areas and community facilities, requiring targeted engagement to address safety, access, and livelihood concerns. The wider area of influence includes agricultural lands, transport routes, and tourism-related destinations, including the Sari Khosor area, which is recognized for its natural and recreational value.

The Project is being implemented by the PIURR under the Ministry of Transport of the Republic of Tajikistan, with financing support from international financial institutions. It has been classified as Category A under the EBRD Environmental and Social Policy (2024), reflecting the scale of works and the potential for significant environmental and social impacts if not properly managed. A full Environmental and Social Impact Assessment (ESIA) is therefore required, alongside ongoing stakeholder engagement in accordance with ESR10.

This Stakeholder Engagement Plan supports the Project by ensuring that affected parties, interested stakeholders, and vulnerable groups are informed, consulted, and able to participate meaningfully in decision-making throughout design, construction, and operation. The summary description provided here focuses on those aspects of the Project that are most relevant to stakeholder interaction, information disclosure, and grievance management, and will be updated as Project design and implementation progress.



### 3. Stakeholder Identification and Analysis

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#### 3.1. Key Definitions

Project stakeholders are defined as individuals, communities, businesses, local and international civil society organizations (CSO), and governmental entities whose interests or rights will be affected, directly or indirectly, by the Project, both positively and negatively, who may have an interest in the Project, and who have the potential to influence the Project outcomes in any way.

In accordance with the EBRD Environmental and Social Policy (2024) and ESR10, stakeholders are categorised as Affected Parties, Other Interested Parties, and Disadvantaged or Vulnerable Individuals or Groups:

- Affected Parties – stakeholders that are affected or may be affected by the project;
- Other Interested Parties – other parties who may have an interest in the project;
- Disadvantaged/Vulnerable Individuals or Groups - individuals or groups who may require special engagement efforts due to their vulnerable status.

#### 3.2. Project Stakeholders

##### 3.2.1. Affected Parties

For the purposes of this SEP, “affected parties” are individuals, households, businesses, and institutions that are - or may reasonably be - directly impacted by Project Activities, as well as near-term enabling works and early operations. This subsection reflects the EBRD PR10/ESR10 approach to stakeholder categorization and the Project’s footprint.

##### 3.2.1.1. Primary affected parties (direct interface with works and/or operations)

- Adjacent residents and land users
- Nearby small businesses and vendors (kiosks, workshops, service shops) whose customer access, loading/parking, and utilities may be disrupted during construction logistics or short-term traffic management.
- Educational facilities within the local catchment (schools, training centers) affected by pupil/parent movements, pedestrian safety, and noise during daytime activities.
- Religious/cultural representatives and caretakers of culturally sensitive places potentially affected by site access, respectful conduct near cultural sites, and any chance-find procedures.
- Road users moving around the Project areas who may encounter temporary detours, altered bus stops, or short-term congestion from deliveries and abnormal loads.
- Construction workers and subcontractor personnel at Project sites, affected by site OHS conditions and the worker GRM (managed under the Labour Management Procedures (LMP) but recognized here as directly impacted stakeholders).

##### 3.2.1.2. Secondary affected parties (indirect or systemic effects)

- Communities located near borrow areas, construction camps, or material transport routes.
- Users of connecting roads experiencing changes in traffic volumes or safety conditions.
- Emergency services and service providers operating in the project vicinity who require coordinated access and traffic planning.



### 3.2.1.3. *Sensitive receptors and cultural heritage*

**Cultural/religious sites and heritage assets** along the road alignment—requiring pre-construction screening, chance-find procedures, and respectful site conduct in coordination with the Ministry of Culture/heritage bodies.

### 3.2.2. *Other Interested Parties*

“Other interested parties” are stakeholders who are not directly affected by works but have roles, mandates, or a demonstrated interest in the Project’s design, oversight, information flow, or performance.

- **Local and regional authorities**
- **Relevant ministries and regulatory agencies**
- **Environmental and social authorities**
- **Academia and research institutions**
- **Civil society organizations/NGOs** (inclusion, heritage, community safety) — outreach partners and independent voices on transparency and vulnerable-group needs.
- **Financiers and MDB partners** — standards assurance, disclosure expectations, and performance monitoring.
- **Media and general public** — information recipients via website postings, municipal portals, and press notes during disclosure.

These parties will be engaged mainly through key-informant interviews, technical workshops, formal correspondence, and public disclosure (websites/noticeboards/press), per the SEP’s planned activities and timelines.

### 3.2.3. *Disadvantaged/Vulnerable Individuals or Groups*

For engagement and risk management, the Project will apply targeted measures for people who may face greater barriers to information, mobility, safety, or voice. Indicative groups in Tajikistan include:

- **Women and girls**
- **Older persons** who may struggle with diversions, long walks, or night-time works.
- **Low-income households and informal workers** (e.g., street vendors/micro-enterprises near station boxes) whose livelihoods could be disrupted by access or utility interruptions.
- **Refugees/IDPs** and recent migrants who may lack networks, documentation, or language confidence to participate.

Initial community consultations conducted in March 2026 demonstrated inclusive engagement in practice, with women comprising five of the twenty-two respondents interviewed along the road corridor. This approach to ensuring female participation will be maintained and strengthened throughout subsequent ESIA consultation and engagement activities.

## 3.3. Stakeholder Mapping and Segmentation

For the purposes of this SEP, stakeholders have been mapped and segmented to ensure that engagement activities are tailored to their level of influence, their needs, and their potential vulnerabilities. Particular attention has been given to identifying disadvantaged or vulnerable groups, such as women, older persons, and persons with disabilities, so that their voices can be heard and their concerns appropriately reflected in the Project design.



Table 1 below presents the key stakeholder groups identified for the Project. It summarizes their characteristics, interests, and influence, and indicates the relevance of engagement with each group across different phases of Project preparation and implementation. This mapping serves as the foundation for designing targeted engagement strategies that are proportionate, inclusive, and effective.

Table 1: Initial Stakeholder Mapping and Segmentation

Stakeholder Group	Description	Area of Influence	Key Interests / Concerns	Level of Influence	Preferred Engagement Channels	Documentation
Local Residents and Land Users	Households and individuals living along the road corridor and in nearby, often dispersed settlements with limited alternative access routes	Road corridor and adjacent settlements	Road safety, access continuity, landslides, dust/noise, emergency access	Medium	Community meetings, household visits, noticeboards	Attendance sheets, minutes, photos
Local Businesses and Service Providers	Small shops, roadside vendors, service providers, and informal economic activities dependent on road access	Settlement nodes along the road	Customer access, construction disruption, safety	Medium	Door-to-door visits, small group meetings	Issue logs, meeting notes
Tourism Operators (Existing and Planned)	Hotels, guesthouses, tour operators, guides, transport providers, and recreational service providers operating in or planning activities in the northern valley and Sari-Khosor area	Northern valley and Sari-Khosor area	Reliable year-round access, visitor safety, construction timing, destination reputation	Medium–High	Targeted meetings, workshops, written briefings	Consultation summaries
Tourism Development Authorities	National and regional institutions responsible for tourism policy, planning, and promotion, including the Committee for Tourism Development under the Government of the Republic of Tajikistan, regional tourism development offices in Khatlon Region, and tourism information centres supporting destination development in areas such as Sari-Khosor	National and Khatlon regional level	Sustainable tourism development, access reliability, visitor safety, environmental protection	Medium	Formal meetings, correspondence, workshops	Meeting records, correspondence
Future Tourists / Visitors	Domestic and international visitors to the Sari-Khosor area and surrounding attractions	Entire corridor, especially northern section	Safety, environmental quality, uninterrupted access	Low (indirect)	Public disclosure, signage, online information	Disclosure records

Stakeholder Group	Description	Area of Influence	Key Interests / Concerns	Level of Influence	Preferred Engagement Channels	Documentation
Road Users	Drivers, public transport users, freight vehicles, pedestrians, cyclists, and livestock herders	Project road and connecting routes	Traffic safety, detours, travel time	Medium	Public notices, signage, community meetings	Communication logs
Protected Area Administration (Sari-Khosor)	Managers and staff responsible for the protected area at the northern terminus of the road and its buffer zones	Protected area and buffer zones	Habitat integrity, disturbance, visitor pressure	High	Formal coordination meetings	Official correspondence
Environmental NGOs – National	Tajikistan-based non-governmental organisations active in biodiversity conservation, protected areas, and environmental awareness, such as Nature Protection Team and Little Earth, with experience in wildlife protection, community engagement, and conservation education	Project area and national level	Species protection, effectiveness of mitigation measures, compliance with national standards	Medium	Technical meetings, information sharing	Meeting minutes
Environmental NGOs – International	International conservation organisations with mandates or programmes related to mountain ecosystems and flagship species, including organisations such as WWF, Fauna & Flora, BirdLife International, and the Snow Leopard Trust	National and international	Impacts on priority biodiversity, application of the mitigation hierarchy, international good practice	Medium	Formal consultation, disclosure	Consultation records
Species-Specific Stakeholders	Specialist institutions, researchers, and conservation organisations focusing on sensitive and protected species present or potentially present in the Project area, including snow leopard in the northern mountainous sections near Sari-Khosor and Himalayan griffon vulture colonies identified in the southern part of the road corridor	Northern and southern sections of the Project corridor	Habitat disturbance, noise and human activity, collision risks, cumulative impacts	Medium–High	Expert consultations, targeted engagement	Technical notes

Stakeholder Group	Description	Area of Influence	Key Interests / Concerns	Level of Influence	Preferred Engagement Channels	Documentation
Academic and Research Institutions	National and regional academic and scientific institutions with expertise in biodiversity, ecology, and environmental monitoring, including the National Academy of Sciences of Tajikistan (notably the Institute of Zoology and Parasitology and the Institute of Botany, Plant Physiology and Genetics), as well as universities such as Tajik National University and Kulob State University	National and regional	Scientific data integrity, protection of sensitive species and habitats, research and monitoring opportunities	Low–Medium	Technical meetings, expert consultations, data sharing, workshops	Meeting notes, technical correspondence
Media and General Public	Local and national media outlets and the general public	National	Transparency, public interest	Low	Press releases, websites	Disclosure logs
Financiers / MDBs	International financial institutions supporting or overseeing the Project	National and international	Environmental and social compliance, risk management	High	Formal reporting, supervision missions	Monitoring and progress reports



## 4. Institutional Analysis

The Project is being implemented in a context characterised by low population density but high environmental sensitivity and growing tourism potential. Effective stakeholder engagement therefore depends not only on direct engagement with communities and interest groups, but also on clear coordination among government institutions, regulatory authorities, scientific bodies, and financing partners. This institutional framework ensures that environmental protection, biodiversity conservation, tourism development, and public safety considerations are integrated into Project planning and implementation, and that stakeholder engagement activities are supported by clear mandates, accountability, and technical expertise. Table 2 below summarises the key institutions relevant to the Project and their roles in relation to stakeholder engagement.

Table 2: Institutional Analysis

Institution	Role in the Project	Mandate / Responsibility	Relevance to Stakeholder Engagement
Ministry of Transport of the Republic of Tajikistan (MoT)	Project owner	National transport policy, planning, and development of road infrastructure	Provides strategic oversight and ensures public accountability for Project delivery
Project Implementation Unit for Roads Rehabilitation (PIURR)	Implementing agency	Day-to-day project management, coordination of contractors and consultants, safeguards implementation	Lead responsibility for implementing the SEP, information disclosure, consultation activities, and grievance management
Local Authorities (District and Jamoat Administrations)	Local governance	Community administration, local development, and public order	Primary institutional interface with local residents, businesses, and tourism operators along the corridor
Committee for Environmental Protection under the Government of Tajikistan (CEP)	Environmental regulator	Environmental permitting, monitoring, inspections, and compliance enforcement	Regulatory oversight of environmental impacts; engagement on mitigation measures and monitoring
Protected Area Administration (Sari-Khosor)	Conservation authority	Management of the protected area and its buffer zones	Key partner for engagement on biodiversity protection, visitor management, and construction activities near the protected area
Ministry of Agriculture and relevant forestry/wildlife bodies	Natural resource oversight	Wildlife management and habitat protection	Coordination on impacts to protected species and implementation of biodiversity mitigation measures
Committee for Tourism Development under the Government of the Republic of Tajikistan	National tourism authority	Tourism policy formulation, planning, and promotion	Engagement on tourism development objectives, access improvements, and sustainability considerations

Institution	Role in the Project	Mandate / Responsibility	Relevance to Stakeholder Engagement
Regional Tourism Development Offices (Khatlon Region)	Regional tourism coordination	Destination support, tourism information, and local promotion	Interface with regional tourism stakeholders and dissemination of Project information
National Academy of Sciences of Tajikistan	Scientific advisory body	Research on biodiversity, ecology, geology, and natural hazards	Provides technical and scientific input on sensitive habitats, protected species, and environmental risks
Emergency Services (health, police, rescue services)	Public safety	Emergency preparedness and response	Coordination on road safety, emergency access during construction, and accident response
Financiers / Multilateral Development Banks (e.g. EBRD)	Project financing and oversight	Environmental and social policy compliance and supervision	Oversight of SEP implementation, disclosure requirements, and overall E&S performance

Given the Project's location in a low-density but environmentally and tourism-sensitive area, coordination between transport, environmental, tourism, and scientific institutions is critical. The institutional framework outlined above ensures that stakeholder engagement is supported by clear mandates, regulatory oversight, and technical expertise, particularly in relation to protected areas and sensitive species.



## 5. Planned Stakeholder Engagement Activities

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Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. Table 3 presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the various project stages.

Although population density along the Project corridor is relatively low, the Project is located in an environmentally sensitive mountain valley with growing tourism potential and proximity to a protected area. As a result, stakeholder engagement extends beyond directly affected households to include tourism operators, conservation authorities, scientific institutions, and national and international environmental organisations with a legitimate interest in biodiversity protection and sustainable destination development.

The Project will carry out stakeholder engagement activities that are inclusive, accessible, and proportionate to the different phases of project preparation and implementation. Activities will be tailored to provide timely information to stakeholders and to create opportunities for meaningful consultation on issues that affect them.

Targeted engagement will also be undertaken with tourism stakeholders, including local hotels, guesthouses, tour operators, and relevant tourism development authorities. Engagement with these stakeholders will focus on construction scheduling, access continuity, visitor safety, and long-term opportunities for sustainable tourism development associated with improved road access.

To ensure accessibility and inclusivity, advance public notice will be provided at least 14 calendar days prior to any in-person meeting, with all disclosure materials made available in Tajik and, where relevant, Russian. Measures will be taken to engage with disadvantaged and vulnerable groups. For example, women-only focus groups will be facilitated by female staff, scheduled around caregiving responsibilities, and held in safe and convenient venues. Engagement with older persons will be scheduled during daylight hours and, where necessary, supported with transport assistance. For persons with disabilities (PwD), consultation venues will be fully accessible, with seating and toilets provided; accessible PDFs and large-print handouts will be produced, and sign-language interpretation offered upon request.

Additional targeted strategies will be used for other vulnerable stakeholders identified for this Project. For internally displaced persons (IDPs), refugees, and migrants, disclosure materials will be translated where needed, simplified with visuals, and distributed through trusted intermediaries such as local NGOs and community leaders. For informal workers and low-income households—including kiosk vendors and market stall operators near worksites—consultation activities will be scheduled outside peak business hours, and project information will be shared via SMS/WhatsApp to minimize disruption to livelihoods. Where mobility or health barriers prevent participation, home visits and small-group sessions will be conducted.

Given the Project's proximity to the Sari-Khosor protected area and the presence of sensitive species such as snow leopard and Himalayan griffon vulture, targeted engagement will be undertaken with protected area authorities, environmental NGOs, and relevant academic and research institutions. This engagement will support the identification of biodiversity risks, review of mitigation measures, and incorporation of scientific and conservation expertise into project design and environmental management instruments.

Engagement around worksites will also incorporate SEA/SH-sensitive practices. A visible code of conduct will be displayed at project sites, referral pathways for survivors will be clearly signposted, and engagement staff will be trained to handle SEA/SH issues in a confidential, survivor-centered manner.



Across all engagement activities, the emphasis will be on providing stakeholders with relevant information in a form that they can understand, and providing opportunities to express views and influence project design. Activities are structured around the three main stages of the project: (i) technical assessments; (ii) preparation of environmental and social framework instruments; and (iii) project design preparation and disclosure of key findings and documents.

Feedback received through consultations, disclosure events, and written submissions will be systematically recorded and reviewed by the Project Implementation Unit (PIURR) and the design and supervision consultants. Stakeholder opinions, suggestions, and concerns are considered during the refinement of the project's technical design (e.g., site layout, access, noise barriers, traffic management) and the finalization of Environmental and Social instruments, including the ESMP, SEP, and LMP.

Comments received during the public disclosure period will be summarized in a "Consultation and Disclosure Report" that documents issues raised and how they were addressed in the final versions of the E&S instruments. Where feasible, relevant design modifications and mitigation measures will be incorporated to minimize adverse impacts and enhance community benefits.

The following table (Table 3) sets out the planned stakeholder engagement activities, their objectives, target groups, timing, and responsibilities.

Table 3: Stakeholder Engagement Plan

Project Stage / Activity	Engagement Method	Target Stakeholders	Purpose	Timing & Frequency	Responsibility
ESIA Disclosure and Scoping	Website disclosure; noticeboards; public display at jamoat offices and community venues; press notice; written submissions	General public; local residents; NGOs; academia; tourism authorities; financiers	Inform stakeholders about the Project and ESIA process; invite comments and identify key issues	At ESIA disclosure; minimum 120 days disclosure period	PIURR
Community Consultations (ESIA Stage)	Public meetings; small-group discussions; household visits (where needed)	Local residents; land users; local businesses; vulnerable groups	Identify local concerns on access, safety, construction impacts, and mitigation	During ESIA preparation; repeated as needed	PIURR / ESIA Consultant
Targeted Engagement with Vulnerable Groups	Women-only FGDs; home visits; small-group sessions; facilitated discussions	Women and girls; older persons; PWD; low-income households; informal workers	Ensure inclusive participation; identify differentiated impacts and mitigation measures	During ESIA and prior to construction; as needed	PIURR / Social Specialist
Tourism Stakeholder Engagement	Targeted meetings; workshops; written briefings	Tourism operators; tourism development authorities; local guides and service providers	Discuss construction scheduling, access continuity, visitor safety, and tourism opportunities	ESIA stage and prior to construction; ad hoc during construction	PIURR
Biodiversity and Protected Area Engagement	Technical meetings; expert consultations; information sharing	Protected Area Administration (Sari-Khosor); environmental NGOs; academic and research institutions	Review biodiversity risks, mitigation measures, and monitoring related to sensitive species and habitats	ESIA stage; prior to works near protected area; periodic during construction	PIURR / ESIA Consultant
Institutional and Regulatory Coordination	Technical workshops; bilateral meetings	Ministries; CEP; local authorities; emergency services	Confirm permits, traffic management, safety measures, and institutional coordination	ESIA and design stages; as required	PIURR

Project Stage / Activity	Engagement Method	Target Stakeholders	Purpose	Timing & Frequency	Responsibility
Pre-Construction Disclosure	Community briefings; site signage; SMS/WhatsApp notifications	Local residents; businesses; road users	Inform stakeholders about construction schedule, traffic changes, and contacts	Prior to commencement of works	PIURR / Contractors
Construction-Phase Engagement	Fortnightly bulletins; site noticeboards; community liaison	Local residents; businesses; road users; tourism operators	Maintain information flow; manage expectations; address grievances	Throughout construction	Contractors (with PIURR oversight)
SEA/SH-Sensitive Engagement	Display of codes of conduct; confidential reporting channels; trained staff	Local communities; workers; vulnerable groups	Prevent SEA/SH risks; ensure safe and confidential reporting	Throughout construction and operation	PIURR / Contractors
Feedback and Reporting	“You Said / We Did” matrix; consultation summaries; website updates	All stakeholders	Demonstrate how stakeholder input influenced Project design and mitigation	After major consultations and disclosures	PIURR
Operation-Phase Engagement	Periodic information updates; GRM operation	Road users; communities; tourism stakeholders	Address operational issues; maintain dialogue	During operation; as needed	PIURR / Road Operator

*All venues PwD-accessible; sign-language on request; large-print/accessible PDFs available.*

Engagement activities will be adapted as Project design advances and construction methods are finalised, with additional targeted engagement undertaken where new risks or stakeholder concerns emerge.



## 6. Stakeholder Engagement to Date

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### 6.1. Initial Consultations

Formal stakeholder engagement was initiated for the Project in 2023. Engagement was resumed in early 2026 as part of ongoing ESIA preparation, including expert consultations, a household socio-economic survey, and community interviews along the road corridor. The following table summarises all consultations completed to date:

Table 4: Stakeholder Engagement to Date

Date	Type of Engagement	Location	Stakeholders	No. Participants	Key Topics Discussed	Key Outcomes / Findings
<b>30 May 2023</b>	Informal stakeholder meeting	Sari Khosor Hotel	Hotel manager; consultants	2+	Access conditions; tourism seasonality; road safety; service provision	Confirmed tourism potential of Sari Khosor; poor road condition limits year-round access; access improvements expected to increase visitor numbers.
<b>8 June 2023</b>	Informal community consultation	Qiozuno settlement	Local householder; consultants	2+	Population decline; winter isolation; access to schools and health services	Highlighted seasonal isolation and out-migration due to poor accessibility; reinforced socio-economic need for year-round access.
<b>8 June 2023</b>	Institutional consultation	Shahidon Office	State Entity for Protected Natural Areas; consultants	3+	Location and boundaries of Sari Khosor Nature Park; ecological sensitivity	Park passport and land-use documentation provided; need for careful consideration of indirect impacts and habitat sensitivity confirmed.
<b>14 June 2023</b>	Institutional consultation	Ministry of Transport (MoT)	Chief Engineer; consultants	2+	Environmental sensitivities; protected areas; project scope	Confirmed environmental constraints and regulatory considerations; alignment near nature park noted.
<b>15–16 June 2023</b>	Institutional consultation	Dushanbe	MoT; State Entity for Protected Natural Areas; consultants	4+	Species lists; mapping of Sari Khosor Nature Park; baseline monitoring programme	Species list shared (noted as outdated); mapping information provided; need for updated biodiversity surveys identified.
<b>26 August 2023</b>	Public consultation	Jamoat Baljuvon	Community members; PIURR; consultants	6	Project overview; environmental impacts; land acquisition; GRM	Community expressed strong support; concerns about road width and pedestrian safety raised.

Date	Type of Engagement	Location	Stakeholders	No. Participants	Key Topics Discussed	Key Outcomes / Findings
<b>5 September 2023</b>	Public consultation	Hukumat Baljuvon	Local authorities; community members	19 (two meetings same day)	Design parameters; compensation principles; construction schedule	Requests for clarity on valuation methodology and timing of compensation.
<b>6 September 2023</b>	Public consultation	Jamoat Baljuvon	Community members	6	Land acquisition impacts; mitigation measures	Emphasis on minimizing impact on businesses and agricultural land.
<b>13 September 2023</b>	Public consultation	Jamoat Sari & Khosor Shahidon	Community members	69	safety; employment opportunities	High attendance in Shahidon; interest in employment opportunities during construction; support for improved access.
<b>9 March 2026</b>	Expert consultation (biodiversity – flora)	Dushanbe (Academy of Sciences)	Botanical expert (Institute of Botany); consultants	2+	Distribution of Red Data Book plant species; habitat characteristics; sensitivity to construction	Preliminary list of plant species of conservation concern developed; regional distribution patterns clarified; need for potential follow-up surveys identified
<b>10 March 2026</b>	Expert consultation (biodiversity – mammals)	Dushanbe (Academy of Sciences)	Mammalogy expert (Institute of Zoology); consultants	2+	Mountain mammal distribution; habitat use; seasonal movements; disturbance sensitivity	Preliminary list of mammal species of conservation concern prepared; key habitats and sensitivities identified; follow-up input agreed

Date	Type of Engagement	Location	Stakeholders	No. Participants	Key Topics Discussed	Key Outcomes / Findings
<b>10 March 2026</b>	Expert consultation (biodiversity – avifauna)	Dushanbe (Academy of Sciences)	Ornithology expert (Institute of Zoology); consultants	2+	Bird migration routes; nesting habitats; disturbance during breeding; riparian ecology	Preliminary list of bird species of conservation concern prepared; important habitats identified; recommendations for further assessment provided
<b>March 2026 (2<sup>nd</sup> to 3<sup>rd</sup> &amp; 16<sup>th</sup> to 19<sup>th</sup>)</b>	Socio-economic survey (household-level engagement)	Project corridor (Baljuvon – Sari Khosor)	Affected households (49 households surveyed)	49 households (372 individuals represented)	Household demographics; income sources; land use; project impacts; road access conditions; community perceptions	Survey confirms strong reliance on seasonal income and agriculture; 4.49% of total land area affected; majority report poor road access and seasonal isolation; strong support for road improvement and expected economic benefits, including tourism
<b>18<sup>th</sup> March 2026</b>	Informal community consultations and structured interviews	Various Villages along the Baljuvon–Sarikhosor road corridor	Local residents (farmers, drivers, small traders)	2	Road surface condition; seasonal road closures; access to markets, health and education services; landslides and flooding; dust impacts	Respondents confirmed poor road condition significantly affects daily life and market access.
<b>25 March 2026</b>	Informal community consultations	Villages along the Baljuvon–Sarikhosor road corridor	Local residents including farmers, construction	20 (including 5 women)	Road surface condition; travel time to district centre (~2 hours);	Strong community support for road rehabilitation. Key concerns: dust control, road safety for pedestrians and livestock, protection of water sources and irrigation channels.

Date	Type of Engagement	Location	Stakeholders	No. Participants	Key Topics Discussed	Key Outcomes / Findings
	and structured interviews	(incl. Dulongmaidon, Doshmandi, Bogizogon, Toidara, Khorma, Chiltori, Dashti Kilko, Shahidon)	workers, shepherds, small traders, drivers, and women		landslides, flooding, rockfalls and mudflows; dust impacts on agriculture and housing; access to markets, health and schools; natural spring near Chiltori village	Primary recommendation: employ local labour during construction. One respondent flagged a natural spring near Chiltori requiring consideration in project design.
<b>20 April 2026</b>	Formal community consultations	Baljuvon	Local community and Head of Jamoat	72 participants	Formal presentation of the draft ESIA findings, resettlement and livelihoods impacts, stakeholder engagement and GRM (see Project Information Brochures in Annex A)	The meeting was overwhelmingly positive. All participants agreed that the new road was of great importance to the region and for connectivity to the Sari Khosor district. Only one question was raised, relating to the issue of gender and how gender aspects would be considered by the Project. The ESIA team responded that a Gender Action Plan will be prepared by PIURR for the Project.
<b>20 April 2026</b>	Formal community consultations	Shahidon Jamoat	Local community and Head of Jamoat	75 participants	Formal presentation of the draft ESIA findings, resettlement and livelihoods impacts,	The meeting was overwhelmingly positive. All participants were keen for the project to start noting that the current condition of the road severely affected their livelihoods. They also noted that movement along the existing corridor was very dangerous leading to at least

Date	Type of Engagement	Location	Stakeholders	No. Participants	Key Topics Discussed	Key Outcomes / Findings
					stakeholder engagement and GRM (see Project Information Brochures in Annex A)	1-2 fatalities every year. They also noted that the road severely hampered their economic ambitions, specifically regarding the movement of agricultural products to market. Several attendees commented that they had no concerns about noise or dust, the long terms benefits of the road improvements was far more important to them than any short-term impacts. Only two comments were raised regarding management of the project. The first related to street lighting and if it would be provided in the town, PIURR responded that it would. Secondly a question was raised about the protection of overhead electricity network during construction. This was noted and the ESIA has been updated to expand upon the mitigation already drafted to manage this aspect.
<b>21 April 2026</b>	Formal Meeting	Dushanbe	Committee for Environmental Protection (CEP)	3	Locations of the Protected Areas within proximity of the project including Sari Khosor NP and Nurek Reserve. Discussion on the Bukhara Deer Farm.	The CEP did not answer the questions, but instead requested they be sent in writing for an official written response.





Note: All 2026 site visits have been significantly affected by adverse weather conditions, which have impacted access along the road corridor and restricted the extent of community engagement that could be carried out.

Note: A meeting with the Committee for Tourism was requested for the 22 April 2026 by PIURR. However, the Committee failed to turn up for the meeting.

## 7. Grievance Redress Mechanism

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### 7.1. General

A grievance is an issue, concern, problem, or claim (perceived or actual) that an individual or community group wants to see resolved. The Grievance Redress Mechanism (GRM) is a locally based, project-site-specific extra-legal way to deal with and resolve activity-related grievances/complaints faster than legal mechanisms and thus enhance project performance standards in terms of environmental and social safeguards.

### 7.2. Purpose and Alignment with EBRD Requirements

In accordance with the EBRD Environmental and Social Policy (2024), PR10, a project-level GRM has been established for the Project. The GRM is designed to provide a transparent, culturally appropriate, and accessible process for receiving, assessing, and resolving concerns and complaints from Project-affected people and other stakeholders throughout all phases of the Project lifecycle.

The GRM applies to environmental, social, land acquisition, resettlement, labour, community health and safety, biodiversity, and stakeholder engagement issues associated with the Project. The mechanism does not prevent or limit access to judicial or administrative remedies and operates independently of such processes.

### 7.3. GRM Principles

The Project GRM is guided by the following principles, consistent with EBRD PR10:

- **Accessibility:** The GRM is available to all stakeholders, including vulnerable and disadvantaged groups, at no cost and without the need for legal representation.
- **Transparency and predictability:** Clear procedures, responsibilities, and timelines are publicly disclosed.
- **Fairness and impartiality:** Grievances are assessed objectively and without discrimination.
- **Confidentiality and data protection:** Personal data are protected, and sensitive cases are handled discreetly.
- **Non-retaliation:** Complainants are protected from retaliation or adverse consequences.
- **Timeliness:** Grievances are acknowledged and addressed within defined timeframes.
- **SEA/SH sensitivity:** Complaints related to sexual exploitation, abuse, or harassment are handled through survivor-centred, confidential pathways.

### 7.4. Types of Grievances Covered

The GRM accepts grievances related to, but not limited to:

- Land acquisition, compensation, and resettlement entitlements
- Temporary or permanent access restrictions
- Construction impacts (noise, dust, vibration, waste, traffic safety)
- Environmental impacts, including impacts on water, biodiversity, and protected areas
- Labour and working conditions (where they affect community members)
- Conduct of contractors and workers
- Stakeholder engagement, disclosure, and consultation processes



- Sexual exploitation and abuse / sexual harassment (SEA/SH)

## 7.5. Grievance Redress Committee

All grievances related to the Project will be addressed with the participation of the PIURR, Construction Supervision Consultant and Contractor's representatives. In more complex cases, representatives of other authorized institutions are to be invited. The GRM covers issues related to social, environmental and other safeguard issues under the EBRD SPS (2024) and applicable laws of Tajikistan.

The PIURR members of the GRC include:

- Chief Engineer
- Social safeguard specialist
- Environmental safeguard specialist
- MoT lawyer other specialists as necessary

Grievance Redress Committee (GRC) will be operating during the entire project cycle. A Focal Person (FP) appointed at each Project Jamoat will coordinate between APs, GRC members at local and PIURR level. The PIURR has been involved in all consultations with project affected persons. The PIURR is in charge to provide the full contact details of GRC members to Jamoats within project influence area so that any aggrieved person can reach out the GRC in case of project related questions, concerns or complaints on social, environmental and LAR issues.

The GRCs will function for the duration of the project implementation. The PIURR will conduct training for members of the GRC at the Hukumat level.

## 7.6. Grievance Handling Procedure

### 7.6.1. GRM: Project Level

Grievances can be lodged with the Focal Person at Jamoat's GRC. A sample grievance application form is included in Annex D. Jamoat's FP, in consultations with the PIURR safeguard specialist, will screen the grievance for eligibility. If eligible, Jamoat's FP will organize a meeting of the GRC. The PIURR representatives will be informed and invited to the meeting.

The complaint registered with the GRM should be reviewed, addressed and a decision made on its relevancy to the Project within 14 calendar days from the date of application submission. If the case is complex or requires more detailed investigation (e.g., inspection by technical experts or legal opinion from the state or certified private entities) the complaint review period may be extended to 30 calendar days or more, if necessary. In such cases, written notification should be sent to the complainant explaining the reasons for extension, describing the process and indicating the expected dates for the delivery of the results of the revision.

All supporting documents such as photographs, related certificates and legal and technical expert opinions, if required, should be prepared, reviewed and assessed. Once the complaint is resolved, the GRC will organize a complaint closure meeting, where the complainant confirms the closure of the complaint. The PIURR representative will oversee the resolution of the complaint.

All efforts will be made to settle issues at the Project level. All complaints and resolutions will be properly documented by the PIURR and made available for review, monitoring and evaluation purposes. A PIURR safeguard specialist keeps in regular contact with the FP of the GRCs and will have a database for the whole Project's grievance cases, including the status of grievances. This report will be regularly included in monthly project progress reports.

### 7.6.2. GRM: Legal System

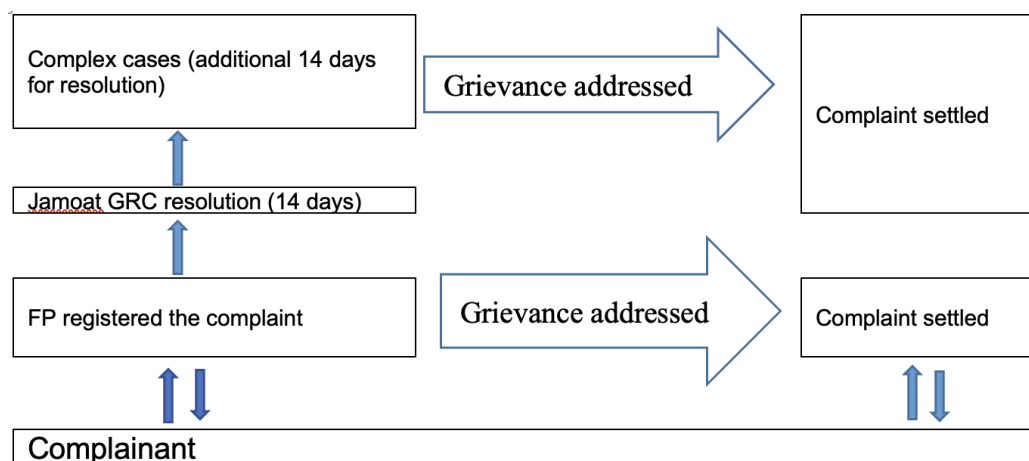
Regardless of the set grievance mechanism and procedures, APs will have the right to submit their cases to a court of law at any point in time of the grievance redress process. All efforts will be made to settle the issues at the Project level through community consultation with affected person. If not possible, attempts will be made to resolve the issues at the PIURR level to avoid/minimize litigation as much as possible. All complaints and resolutions will be properly documented by the PIURR and made available for review, monitoring and evaluation purposes.

### 7.6.3. GRM: EBRD Independent Project Accountability Mechanism

If the complaints remains unresolved, as a last resort APs may register a complaint with the EBRD. In this case, the Focal Person will inform the complainants that they can refer their complaints through the EBRD Tajikistan Resident Mission for proper coordination with the responsible project officer and relevant staff. Alternatively, the complainants may access the EBRD Independent Project Accountability Mechanism through its Chief Accountability Officer. The Independent Project Accountability Mechanism (IPAM) addresses concerns raised by project-affected people and organizations in relation to obligations of the Bank as per the Environmental and Social Policy and Access to Information Policy. IPAM reports directly to the Board of Directors and is independent of Bank management. IPAM is accessible via:

- The link on EBRD website: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/submit-a-complaint.html>
- Tajikistan Resident Office  
Head of Office: Holger Wiefel  
34 Rudaki avenue, 12 floor, 734025 Dushanbe, Tajikistan  
Tel: +992 (48) 701 13 25
- Independent Project Accountability Mechanism  
Attn: Chief Accountability Officer  
European Bank for Reconstruction and Development  
Five Bank Street, London, E14 4BG, UK

Project Location Map



### 7.7. GRC Contacts

The local authorities in accordance with the requirements of Articles 26 of the Law of the Republic of Tajikistan "On regulatory legal acts" and 19, 20 of the Constitutional Law of the Republic of Tajikistan "On local executive body of the government" provided the list of persons to be acting as the members of local GRCs in relevant rayons as given in the table below.



The Baljuvon District GRC has jurisdiction over all Project-affected Jamoats within the district, including Baljuvon Jamoat and Shahidon Jamoat. A Focal Person will be designated at each Jamoat office to serve as the first point of contact for grievances and to liaise with the district-level GRC.

Table 5: Composition of GRC at Local level

Full Name	Position	Phone
Grievance Redress Committee in Baljuvon District		
Yusupzoda Izzatullo	Deputy Chairman of the Baljuvon District Administration	939637880
Gaforzoda Abdurakhmon	Chief Architect	937383929
Abdulloev Umed	Chairman of the Land Management Committee of Baljuvon District	101333332
Gulov Davlatali	Chairman of Baljuvon Jamoat	933072907, 904778842
Mirzoev Saimumin	Land Management Specialist of Baljuvon Jamoat	203326555

#### Representatives of the PIURR Safeguards Unit

<p>Nodirkhonov Shodikhon Resettlement specialist of Project Implementation Unit for Roads Rehabilitation</p> <p>Address: 14 Ayni Street, 4th Floor, Dushanbe, Tajikistan Tel: + 992 37 222 20 78 + 992 93 840 16 00 Email: shodihon@piu.ru</p>	<p>Mirzoev Farhod Environmental specialist of Project Implementation Unit for Roads Rehabilitation</p> <p>Address: 14 Ayni Street, 4th Floor, Dushanbe, Tajikistan Tel: + 992 50 777 71 71 Email: farhodpiu@mail.ru</p>
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## 7.8. GRC Complaint Register, Records and Documentation

The PIURR of the MoT will maintain the complaint register. This will include a record of all complaints for regular monitoring of grievances and results of services performed by the GRCs for periodic review by the EBRD. A sample grievance log to be used for the project is attached in Annex B.

PIURR will conduct training for GRC members on grievance registration procedures at the beginning of RP implementation and keep this practice for the entire project duration, as needed.

## 7.9. Technical Experts

When requested by the PIURR to provide technical expertise for the assessment of an impact claimed by the complainant, the relevant expert will:

- examine the case, perform relevant tests or an investigation
- prepare a short report based on the results of the examination completed
- recommend if further or additional legal opinion or expertise is needed to make a judgement on the substance of the case.

## 7.10. SEA/SH Sensitive Grievance Handling

SEA/SH-related grievances are managed through a separate, survivor-centred process, consistent with EBRD good practice:

- Complaints may be submitted anonymously



- No investigation or information sharing occurs without survivor consent
- Survivors are referred to appropriate support services where available
- SEA/SH cases are recorded only as anonymised statistics for monitoring purposes

All personnel involved in grievance handling receive training on SEA/SH risk mitigation and confidential response protocols.

### 7.11. Worker GRM

A separate Worker Grievance Redress Mechanism (Worker GRM) will be established and implemented in accordance with EBRD Performance Requirement 2 (PR2) and the Project's LMP.

Key features include:

- Coverage of working conditions, wages, hours, OHS, discrimination, harassment, and worker conduct
- Multiple access channels, including anonymous submissions
- Confidentiality and non-retaliation
- SEA/SH survivor-centred handling consistent with Section 7.8
- Escalation to PIURR and, where applicable, labour authorities

Aggregate, non-identifying data from the Worker GRM will be reported alongside community GRM performance indicators.

### 7.12. Monitoring, Reporting and Disclosure

GRM performance will be monitored using PR10-aligned indicators, including:

- Number and type of grievances received
- Percentage acknowledged within 5 working days
- Percentage resolved within 30 working days
- Number of anonymous grievances
- SEA/SH cases reported as aggregated statistics only

Grievance data will be reviewed monthly and summarised in quarterly reports to the EBRD. Aggregated GRM performance information will be disclosed publicly, while ensuring confidentiality and data protection.

### 7.13. Data Protection and Privacy

Personal data collected through stakeholder engagement activities and the GRM, including names, contact details, and grievance records, will be handled in accordance with applicable national legislation and EBRD requirements. Access to grievance registers and consultation records will be restricted to authorised personnel only. Data will be stored securely, used solely for Project purposes, anonymised where appropriate (including for reporting), and retained only for the duration necessary to fulfil monitoring and reporting obligations.

### 7.14. Awareness Raising

Information on the GRM will be included in Project Information Materials, disclosed through public noticeboards and websites, and explained during stakeholder engagement activities to ensure stakeholders are aware of their rights and available channels for raising concerns.





## 8. Information Disclosure

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### 8.1. Objectives of Information Disclosure

Information disclosure is a core element of meaningful stakeholder engagement under PR10. The objective of information disclosure for the Project is to ensure that Project-affected people and other interested stakeholders have timely access to relevant, accurate, and understandable information about the Project, its potential environmental and social impacts, proposed mitigation measures, and opportunities for engagement.

Disclosure activities are designed to support informed participation in decision-making, promote transparency and accountability, and enable stakeholders to raise questions, comments, and grievances throughout all phases of the Project lifecycle.

### 8.2. Disclosure Principles

Information disclosure for the Project will be guided by the following principles:

- **Timeliness:** Information is disclosed early enough to allow stakeholders to understand issues and provide informed input.
- **Accessibility:** Information is disclosed through channels that are locally accessible and appropriate to stakeholder needs.
- **Inclusivity:** Disclosure materials are provided in formats and languages that are understandable to different stakeholder groups, including vulnerable and disadvantaged groups.
- **Proportionality:** The level of detail disclosed is commensurate with the Project's risks, impacts, and stage of development.
- **Transparency:** Information on Project decisions, mitigation measures, and stakeholder feedback is disclosed in a clear and consistent manner.

### 8.3. Language and Formats

Project information will be disclosed primarily in Tajik, with Russian versions provided where relevant. English versions of key documents will be disclosed for financiers and international stakeholders.

To support inclusive access:

- Printed materials will be made available at local authority offices and community venues.
- Accessible formats (large print, simplified summaries, visual materials) will be provided where needed.
- Verbal explanations will be provided during consultations to support stakeholders with low literacy.

### 8.4. Disclosure Channels

Information will be disclosed through a combination of the following channels:

- Project and/or PIURR website
- Local authority offices (district and jamoat buildings)
- Publicly accessible community locations in the Project area
- Noticeboards at construction sites
- SMS/WhatsApp notifications (where available)



- Public meetings and consultation events
- Financiers' websites, where required

Disclosure channels will be selected to ensure that stakeholders with limited internet access can still obtain Project information.

### 8.5. Disclosure Timing and Updates

Disclosure will be undertaken at key stages of the Project, including:

- ESIA disclosure and consultation
- Finalisation of environmental and social instruments
- Pre-construction phase
- Construction phase (ongoing updates)
- Operation phase (as relevant)

Information will be updated as Project design evolves and when material changes occur that may affect stakeholders.

### 8.6. Feedback and Transparency

Stakeholders will be provided with opportunities to submit comments and questions on disclosed information through consultations, written submissions, and the Grievance Redress Mechanism (GRM). Feedback received will be reviewed and addressed by the Project Implementation Unit for Roads Rehabilitation (PIURR).

A summary of stakeholder comments and responses ("You Said / We Did") will be disclosed following major disclosure periods to demonstrate how stakeholder input has informed Project design and mitigation measures.

Table 6: Information Disclosure

Document / Item	Channel & Location	Language(s)	Timing / Updates	Responsible	Evidence
Draft ESIA package (ESIA, ESMP, SEP, ESMPF, LMP)	Project website; local authority offices; public venues (e.g. jamoat buildings); financiers' websites (where required)	Tajik; Russian; English (for financiers)	During ESIA disclosure period (minimum 120 days for Category A); updated prior to finalisation	PIURR	Screenshots; posting logs; disclosure letters
Consultation notices	Local authority noticeboards; community venues; project website; SMS/WhatsApp (where available)	Tajik (+ Russian where relevant)	At least 14 calendar days prior to each consultation	PIURR	Copies of notices; photos; web captures
GRM information and access	Website; posters in affected communities; leaflets at meetings; verbal explanation during consultations	Tajik (+ accessible formats as needed)	Prior to construction and throughout Project implementation	PIURR	Live links; photos of posters; GRM logs
Consultation materials (presentations, handouts)	Website downloads; printed copies at meetings	Tajik; Russian; English (for financiers)	Prior to consultations where feasible; archived after events	PIURR / ESIA Consultant	Upload logs; PDFs
Consultation minutes and attendance records	Website (engagement section); hard copies on request	Tajik (English summaries where relevant)	Within 10 working days following each consultation	PIURR / ESIA Consultant	Signed attendance sheets; minutes; photos
Stakeholder comments and response matrix ("You Said / We Did") and final E&S instruments	Project website; disclosure venues; ESIA annexes	Tajik; Russian; English (summary)	Following disclosure period and ESIA finalisation	PIURR / ESIA Consultant	Published matrices; final ESIA documents



Information disclosure commitments set out in this section will be reviewed periodically and updated as necessary to reflect changes in Project design, stakeholder needs, or regulatory requirements.

## 9. Resources and Responsibilities for SEP Implementation

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### 9.1. Roles and Responsibilities

Effective implementation of this SEP requires clear allocation of roles and responsibilities among the PIURR, contractors, and supporting consultants. Roles are structured to ensure that stakeholder engagement, information disclosure, and grievance management are implemented consistently and in line with PR10 throughout the Project lifecycle.

#### **Project Implementation Unit for Roads Rehabilitation**

PIURR holds overall responsibility for implementation and oversight of the SEP. Key responsibilities include:

- Ensuring that stakeholder engagement activities are planned and implemented in accordance with Sections 5–8 of this SEP
- Leading information disclosure activities, including disclosure of environmental and social documents and consultation outcomes
- Oversight and coordination of the project-level Grievance Redress Mechanism (GRM), including escalation and reporting
- Ensuring SEA/SH-sensitive grievance handling in accordance with Section 7
- Coordinating engagement with government authorities, tourism development bodies, protected area administrations, environmental NGOs, and academic institutions
- Maintaining records of stakeholder engagement activities, disclosures, and grievances
- Reporting on SEP implementation and GRM performance to the EBRD

#### **Contractors**

Contractors engaged for construction works will support SEP implementation at site level. Their responsibilities include:

- Appointing site-level stakeholder engagement and grievance focal points
- Implementing site-based information disclosure measures, including signage and notices
- Serving as the first point of contact for community grievances during construction
- Managing the Worker Grievance Redress Mechanism in accordance with PR2 and the Project's Labour Management Procedures
- Supporting PIURR in the timely resolution and documentation of grievances
- Ensuring that contractor personnel are trained on community relations, code of conduct requirements, and SEA/SH risk mitigation

#### **Construction Supervision Consultant (CSC) – Also Referred to as the “Engineer”**

The CSC supports PIURR in monitoring and verification of SEP implementation. Responsibilities include:

- Verifying the effectiveness of stakeholder engagement and disclosure activities at site level
- Supporting grievance assessment, site inspections, and technical reviews
- Advising PIURR on corrective actions where gaps in SEP implementation are identified
- Supporting documentation and reporting related to stakeholder engagement and grievances



## Environmental and Social Specialists

Environmental and social specialists engaged by PIURR or through the CSC will provide technical support for SEP implementation, including:

- Facilitating engagement with vulnerable groups, tourism stakeholders, and biodiversity-related stakeholders
- Supporting SEA/SH-sensitive engagement and grievance handling
- Assisting in the preparation of disclosure materials and consultation summaries
- Supporting monitoring, reporting, and continuous improvement of engagement practices

Prior to public disclosure, the SEP will be reviewed and discussed in a Client-led workshop to confirm roles, responsibilities, and implementation arrangements.

### 9.2. Resources for Stakeholder Engagement

PIURR will ensure that adequate financial, human, and logistical resources are made available to implement the SEP effectively throughout the Project lifecycle. Resources will be scaled proportionately to the Project's environmental and social risks and the intensity of engagement required at different stages.

Resources may include, as appropriate:

- Dedicated environmental and social staff within PIURR
- Budgetary provisions for stakeholder engagement activities, including meetings, travel, venue hire, translation, and disclosure materials
- Resources for operation of the GRM, including grievance tracking, communication, and reporting
- Training for PIURR staff, contractors, and consultants on stakeholder engagement, GRM procedures, and SEA/SH risk mitigation
- Logistical support for engagement with remote communities and institutions

Resource requirements will be reviewed periodically and adjusted as necessary to reflect Project progress, stakeholder needs, and any emerging risks or issues.

### 9.3. Coordination and Continuous Improvement

PIURR will coordinate regularly with contractors, consultants, and relevant institutions to ensure consistent application of the SEP. Lessons learned from stakeholder engagement activities and GRM operation will be used to improve engagement approaches over time.

Where monitoring identifies gaps or recurring concerns, PIURR will take corrective action, including adjusting engagement methods, strengthening communication, or allocating additional resources, as necessary.

## 10. Monitoring and Reporting

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### 10.1. Objectives of Monitoring and Reporting

Monitoring and reporting are essential to ensure that stakeholder engagement, information disclosure, and grievance management activities are implemented effectively and in accordance with this SEP and EBRD requirements. The objectives of monitoring and reporting are to:

- Track implementation of planned stakeholder engagement activities
- Assess the effectiveness and inclusiveness of engagement and disclosure
- Monitor performance of the Grievance Redress Mechanism (GRM) and Worker GRM
- Identify gaps, emerging risks, or recurring concerns
- Support adaptive management and continuous improvement

### 10.2. Monitoring Indicators

Monitoring will be undertaken using qualitative and quantitative indicators aligned with Sections 5–8 of this SEP. Indicative indicators include, but are not limited to:

#### **Stakeholder Engagement**

- Number and type of engagement activities conducted (by stakeholder group)
- Participation levels, including participation of vulnerable and disadvantaged groups
- Issues raised during consultations and follow-up actions taken

#### **Information Disclosure**

- Documents disclosed and disclosure channels used
- Timeliness of disclosure relative to Project milestones
- Accessibility of information (languages, formats, locations)

#### **Grievance Redress Mechanism**

- Number and type of grievances received (community and workers)
- Percentage of grievances acknowledged within 5 working days
- Percentage of grievances resolved within 30 working days

#### **Number of grievances escalated beyond site level**

- SEA/SH cases reported as aggregated, anonymised statistics only
- Monitoring indicators may be refined during Project implementation to reflect evolving stakeholder needs and Project conditions.

### 10.3. Monitoring Responsibilities

Monitoring and reporting responsibilities are allocated as follows:

#### **PIURR**

- Overall responsibility for monitoring SEP implementation and GRM performance
- Maintenance of stakeholder engagement records and grievance logs





- Preparation of periodic monitoring reports

#### **Contractors**

- Site-level monitoring of engagement activities and grievances
- Reporting of grievances and engagement activities to PIURR

#### **Construction Supervision Consultant (CSC)**

- Verification of monitoring data
- Site inspections and review of stakeholder engagement practices
- Support to PIURR in identifying corrective actions

### **10.4. Reporting**

Monitoring results will be documented and reported through the following mechanisms:

**Internal reporting:** Regular review of monitoring data by PIURR to inform day-to-day management decisions.

**External reporting:** Periodic reporting to the EBRD on SEP implementation and GRM performance, as part of Project environmental and social reporting requirements.

**Public disclosure:** Aggregated information on stakeholder engagement activities and GRM performance will be disclosed publicly, where appropriate, while ensuring confidentiality and data protection.

### **10.5. Adaptive Management and Continuous Improvement**

Stakeholder engagement and grievance management are dynamic processes that evolve over the Project lifecycle. PIURR will apply an adaptive management approach, using monitoring results, stakeholder feedback, and GRM data to:

- Adjust engagement methods and frequency
- Improve accessibility and inclusiveness of engagement and disclosure
- Strengthen grievance handling procedures
- Allocate additional resources where needed

Where monitoring identifies recurring or systemic issues, corrective actions will be implemented in a timely manner and reflected in updated engagement practices.

The SEP will be updated where material changes to Project design, scope, risks, or stakeholder concerns occur, and any updated versions will be disclosed in accordance with Section 8.

## Annex A: Stakeholder Consultation Data

This annex presents supporting data from stakeholder engagement and expert consultations conducted in 2026 as part of ESIA preparation for the Baljuvon–Sari Khosor Road Project. It covers community consultations conducted along the road corridor in March 2026 and expert consultations with national biodiversity specialists from the Academy of Sciences of the Republic of Tajikistan.

### A.1 Community Consultations (March 2026)

Community consultations and structured interviews were conducted along the Baljuvon–Sarikhosor road corridor in two stages in March 2026. The purpose was to collect the views, concerns, and recommendations of local residents potentially affected by or benefiting from the road rehabilitation project.

Due to adverse weather conditions during the first stage, sections of the road were washed out and access to several villages was temporarily impossible, limiting the number of interviews that could be completed at that time.

#### Settlements covered:

Village	Approximate Population
Dulonmaidon	~220
Doshmandi	~380
Bogizogon	~890
Toidara	~215
Khorma	~96
Chiltori	~120
Dashti Kilko	~150
Shakhidon (Jamoat Center)	~1,650

#### Respondent profile:

A total of 22 individuals were interviewed across both stages, including 5 women. Main occupations represented included farmers, construction workers, shepherds, small traders, and drivers. The age distribution of respondents was as follows:

Age Group	Percentage
Under 30 years	36%
30–50 years	55%
Over 50 years	9%

#### Key findings:



Road condition and access: All respondents identified poor road condition as the primary issue affecting their daily lives. Current travel time to Baljuvon is approximately two hours, increasing significantly during rain and winter periods. Seasonal road closures isolate communities from markets, health services, and schools.

Natural hazards: Respondents reported landslides, flooding and washouts, rockfalls, mudflows, and dust as recurring hazards along the corridor. Several sections are periodically completely blocked. A natural spring near Chiltori village was flagged by one respondent as requiring consideration in project design.

Community expectations: All respondents expressed strong support for the project. Improved road access is expected to benefit agricultural market access (particularly for potatoes and apples), health and education services, transport safety, and employment opportunities.

Construction recommendations: Key recommendations included employing local workers, coordinating works with Jamoat authorities, maintaining road access throughout construction, controlling dust, ensuring pedestrian and livestock safety, and protecting water sources and irrigation channels.

## **A.2 Biodiversity Expert Consultations (March 2026)**

Consultations were conducted with national scientific experts from the Academy of Sciences of the Republic of Tajikistan by Alikhon Latifi in March 2026. The objective was to verify the occurrence and conservation status of species potentially present within the project area and to ensure the biodiversity assessment reflects the most current scientific knowledge available for the region. Particular attention was given to species listed in the Red Data Book of the Republic of Tajikistan and the IUCN Red List.

Botanical Expert — 9 March 2026 Expert: K. Bobokalonov, Candidate of Biological Sciences, Institute of Botany

The consultation focused on the diversity and distribution of rare and protected plant species in foothill and mountainous ecosystems, habitat characteristics within the project area, and the sensitivity of local vegetation to construction activities. A preliminary list of plant species of conservation concern potentially occurring within the project area was compiled. Continued cooperation was agreed for subsequent survey stages if required.

Mammalogy Expert — 10 March 2026 Expert: Z. Amirov, Candidate of Biological Sciences, Institute of Zoology and Parasitology

The consultation addressed distribution patterns of rare and protected mammals, potential occurrence of mountain ungulates, seasonal movement and habitat use patterns, and sensitivity to construction-related disturbance, noise, and habitat fragmentation. A preliminary list of mammal species of conservation concern was prepared, with key habitats identified. Continued collaboration was agreed.

Ornithology Expert — 10 March 2026 Expert: G. Garibmamadov, Candidate of Biological Sciences, Institute of Zoology and Parasitology

The consultation covered potential occurrence of rare and protected bird species, the area's role as a migratory route, the ecological importance of riparian and nesting habitats, and sensitivity to construction disturbance during breeding periods. A preliminary list of bird species of conservation concern was prepared, alongside identification of habitats important for nesting and migratory birds. Further cooperation was agreed if additional ornithological input is required.

## **A.3 Formal Stakeholder Consultations (April 2026)**

**April «20», 2026**



## The office of the Executive body of state authority of the Baljuvon District, 10:30am

### Participants:

1. Affected persons and residents of the district;
2. Representatives of the Executive Authority of Baljuvon District and the Baljuvon town jamoat;
3. Representative of the Project Implementation unit for roads Rehabilitation and Reconstruction the Consulting company VISTA Environment;
4. Representatives of the district's subordinate Government agencies;
5. Other interested persons.

### Agenda:

1. Brief information about the project;
2. Brief information on the Environmental and Social Policy of the EBRD;
3. Introduction to the Environmental Impact Assessment (EIA) report;
4. Introduction to the requirements of the Resettlement Action Plan;
5. Other unforeseen issues.

The Public consultation was held with the aim of providing information about the project, the Environmental and Social Policy of the EBRD, the ESIA report, and the requirements of the Resettlement Plan.

In addition to representatives of the executive Authority of Baljuvon District and the Baljuvon town jamoat, the consultation was attended by representatives of the— Project Implementation unit for roads Rehabilitation and Reconstruction Saidov K., Project Coordinator, and Nodirkhonov Sh., Resettlement Specialist — as well as representatives of the consulting company VISTA Environment — Nick Skinner, Team Leader, and Abduvohidzoda E., Local Consultant.

During the meeting on environmental protection issues, detailed information was presented, particularly regarding the Environmental Impact Assessment report and the requirements for implementing the Resettlement Action Plan. It was also emphasized that participants could review the Environmental Impact Assessment report on the official website of the Ministry of Transport and submit their comments within 30 days after the meeting. Information leaflets were also distributed to the participants during the meeting.

The following questions were raised by the participants to the members of the working group:

#	Question	Answer
1	In the event of relocation of residential houses within the framework of the project, what types of compensation and assistance are provided?	It should be noted that physical or economic displacement is not anticipated within the framework of the project. However, in the event that such a situation arises, the full value of buildings and structures will be determined and compensated by the project based on market value. In addition, affected households will receive other forms of assistance, such as compensation for severe impact, vulnerability support (if applicable), transportation of belongings, re-documentation (obtaining a land use certificate and technical passport), and preparation of a land plot.
2	Are measures for protection against natural hazards included within the framework of the project?	The project has been developed taking into account actual site conditions. In particular, during the design stage, natural hazards such as mudflows and landslides were studied, and accordingly, culverts and bridges

		were designed. In addition, the project has been prepared and will be implemented with consideration of climate change. At the same time, during project implementation, there is also the possibility of introducing adjustments and taking into account other relevant conditions if necessary.
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The participants signed to confirm their attendance at the public consultation and receipt of information on the Environmental Impact Assessment, as well as land allocation for population resettlement.

Nº	Name	Occupation and profession
1	Kholov Nekruz	Laboratory Manager
2	Abdullozoda Osia	District Sanitary and Epidemiological Surveillance Center (SES), Baljuvon
3	Gafurova Z.	HR Specialist, SES
4	Hukmatova G.	Cleaner
5	Husenov S.	Director of MNMJO (abbreviation)
6	Safarkhonzoda J.	Head of ASIN Department
7	Khojaev Abdugaffor	Community Leader
8	Khairullozoda F.	Fund Chief Specialist
9	Azimov Ikromiddin	Insurance Director
10	Vohidov Jamshed	Warehouse Manager (KFD)
11	Kamolov Qurbon	Cultural Worker
12	Kamolov Fazliddin	Head of AIDS Center
13	Salomova N.	Doctor
14	Sobirov Alisher	Chief Editor
15	Azizov Khayrandesh	Office Clerk
16	Saidov Emomali	Head of Social Protection Department
17	Khojaev Samariddin	Deputy Head of Amonatbank Branch
18	Ibrohimzoda M.	Director of "BMMG" State Enterprise
19	Ahadzoda S.	SSU, Baljuvon District
20	Abdulloev U.	Head of Land Management Committee
21	Ghaforzoda A.	Chief Architect
22	Kimyoi N.	Archive Department Head
23	Safarova Shahnoza	Secretary
24	Ashurova Rukhshona	Organizational Department Specialist
25	Tamanna M.	Chief Organizational Specialist
26	Aminzoda Maftuna	Organizational Department Specialist
27	Kabulzoda Alifmo	Social Development Department Specialist
28	Shoirai Fayzali	Leading Specialist
29	Sharipova Nasiba	Nurse
30	Rahimzoda Sayyora	Nurse
31	Akbarzoda Farida	Doctor
32	Hukmatova Z.	Nurse
33	Parvina Ubaydullo	Nurse
34	Yusupov Olim	Medical Assistant (Brother of Medicine)
35	Gulova Ra'nogul	Nurse
36	Rashidova Olufta	Nurse
37	Oimahmadova J.	Nurse
38	Jalilova Z.	Nurse
39	Turakhonov A.M.	Head of Investment Department
40	Khayriniso M.	Office Clerk
41	Sabrina O.	Nurse

No	Name	Occupation and profession
42	Marshoyev D.	Rural Medical Facility (RMF)
43	Muhabbatzoda J.	Director of Summer Park
44	Malohati I.	Office Clerk
45	Malohat A.	Singer
46	Fariza R.	Cleaner
47	Moiri M.	Specialist
48	Abdulkhayrova K.	Cleaner
49	Boboeva Sh.	Cleaner
50	Khojazoda Sunnatullo	Leading Specialist
51	Isupov Olimjon	District Resident
52	Bobojoni Kholmahmad	Medical Assistant (Brother of Medicine)
53	Nusratov Anvar	District Resident
54	Mahmadaliyev I.	Jamoat Secretary, Baljuvon
55	Jumazoda Z.J.	Head of MDNRA, Baljuvon
56	Sheraliyeva R.E.	Gymnasium Director
57	Faridabonu A.	Statistics Department Specialist
58	Khojaeva Zarina	District Resident
59	Kholova Jumagul	Cleaner
60	Nabotova Idigul	District Resident
61	Musoeva Sh.S.	Cleaner
62	Rozikov Sh.A.	Chief Specialist, Culture Department
63	Haydarzoda S.	Student
64	Azizullozoda A.	Student
65	Gulmahmadzoda A.	Ecology Department Head
66	Gulov D.	Chairman of Baljuvon Jamoat
67	Khojaev D.	Pensioner
68	Muqimov B.	Farmer Household Owner
69	Nodirkhonov Sh.	Resettlement Specialist
70	Yusupov S.	Unemployed Person
71	Toirov M.	Entrepreneur
72	Mirzolev F.	Car Mechanic
73	Bodomov J.	Farmer
74	Gulov Y.	Pensioner
75	Murodova M.	House wife

Total: 74 people

Male: 41 p or 55,4%

Female: 33 p or 44,6%









**April «20», 2026**

**The office of jamoat of Sari Khosor, 14:30pm**

Participants:

1. Affected persons and residents of the district;
2. Representatives of the Executive Authority of Baljuvon District and the Baljuvon town jamoat;
3. Representative of the Project Implementation unit for roads Rehabilitation and Reconstruction the Consulting company VISTA Environment;
4. Representatives of the district's subordinate Government agencies;
5. Other interested persons.

Agenda:

1. Brief information about the project;
2. Brief information on the Environmental and Social Policy of the EBRD;
3. Introduction to the Environmental Impact Assessment (EIA) report;
4. Introduction to the requirements of the Resettlement Action Plan;
5. Other unforeseen issues.

The Public consultation was held with the aim of providing information about the project, the Environmental and Social Policy of the EBRD, the ESIA report, and the requirements of the Resettlement Plan.





In addition to representatives of the executive Authority of Baljuvon District and the Baljuvon town jamoat, the consultation was attended by representatives of the— Project Implementation unit for roads Rehabilitation and Reconstruction Saidov K., Project Coordinator, and Nodirkhonov Sh., Resettlement Specialist — as well as representatives of the consulting company VISTA Environment — Nick Skinner, Team Leader, and Abduvohidzoda E., Local Consultant.

During the meeting on environmental protection issues, detailed information was presented, particularly regarding the Environmental Impact Assessment report and the requirements for implementing the Resettlement Action Plan. It was also emphasized that participants could review the Environmental Impact Assessment report on the official website of the Ministry of Transport and submit their comments within 30 days after the meeting. Information leaflets were also distributed to the participants during the meeting.

The following questions were raised by the participants to the members of the working group:

#	Question:	Answer:
1	Is the installation of a lighting system planned within the project?	Yes, within the project, the installation of a lighting system is planned only in populated areas and at bus stops.
2	Along the existing road there is a power line, and most of its poles are in poor condition. Does the project include replacement and relocation of the power line?	All utility networks — including water supply lines, power lines, and communication lines that are affected by the project — will be relocated at the project's expense. Specific provisions are included in the ESIA to inform the community about any temporary interruptions to power supply during construction works.
3	In this area, large floods occur in spring, and the river water level rises, causing significant damage both to the existing road and surrounding lands. What protective measures are included in the project?	Climate conditions, flooding, and other natural hazards were studied during the survey phase. Based on actual conditions such as rainfall, flooding, and related factors, the project was designed accordingly, with climate change also taken into account. Considering all these factors, substantial riverbank protection works have been included in the project, and additional protective measures will be implemented during construction if necessary.
4	Where can we apply in case of complaints or requests?	For the purpose of handling complaints, the project has established a Grievance Redress Mechanism (GRM), which is specifically designed to ensure the prompt review of all complaints and requests from individuals and legal entities. In addition, a Grievance Redress Committee has been established, consisting of representatives of neighborhood leaders, the jamoat chairperson, the relevant deputy district head, district sub-division agencies, staff of the Road Rehabilitation Project Implementation Unit, consultants, the project contractor (project management office), and other relevant institutions. At the end of the distributed information leaflets, contact phone numbers and email addresses of responsible project personnel are indicated.
5	How long will the construction works take?	The duration of the construction works will be determined depending on the scope of the construction activities and other related factors. Using available resources, the implementation of construction works will be accelerated as much as possible.

Participants signed to confirm their attendance at the public consultation meeting and to acknowledge receipt of information regarding the ESIA, as well as land allocation for population resettlement.

Nº	Name	Occupation and Profession
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1	Yatimov Davlat	Pensioner
2	Sharifov A.	Doctor
3	Odinayev E.	Nature Park Employee
4	Nosirov S.	Teacher
5	Zuhurov S.	Pensioner
6	Fayzulloev J.	Teacher
7	Safarzoda S.	Teacher
8	Yatimov I.	Unemployed
9	Sadiev A.	Director of “Dusty” Company
10	Toirov I.	Chief Doctor
11	Azizova L.	Museum Manager
12	Saidov S.	Farm Manager
13	Ismoilova M.	Boarding School Staff
14	Shokirova Sh.	Cleaner
15	Nabieva M.	Cleaner
16	Yatimova M.	Cleaner
17	Yatimova N.	Cleaner
18	Mamajoni S.	Cleaner
19	Ghoibova Kh	Educator
20	Saidova Z.	Nurse
21	Qurbonova S	Homemaker
22	Yunusova O.	Cook
23	Samadova O.	Laundry Worker (Boarding School)
24	Mahmadaliyeva S.	Cleaner
25	Jabborova M.	Nurse
26	Safiya B.	Cleaner
27	Sayyora M.	Nurse
28	Sharipova D. — Cook	Cook
29	Saidaliyeva M.	Cleaner
30	Mahmadaliyeva Sh	Cleaner
31	Qurbonova H	Cleaner
32	Saidova D.	Cleaner
33	Yusupov R.	Community Leader
34	Kholov M.	Boarding School Director
35	Shokirov A	Forestry Worker
36	Yusupov I	Community Leader
37	Yusupov S.	Forestry Worker
38	Mizrobov D	Electricity Company Worker
39	Fatoyev A	Forestry Worker
40	Valiev A.	Unemployed
41	Saidov T.	Unemployed
42	Yatimova L	Cleaner
43	Rahmatulloev B.	Director of Disabled Home
44	Farshedi J.	Senior Inspector
45	Rahmatulloev N.	Pensioner
46	Abrorov A.	Teacher
47	Fatoyev S	Military Employee
48	Yatimov S	Community Leader
49	Saidov P	Pensioner
50	Mahmudov F.	Electricity Company Worker
51	Aminov O.	Unemployed
52	Saidov A.	Unemployed
53	Rizomov M	Unemployed
54	Mahmudjoni F.	Teacher

55	Sayfulloev S	Unemployed
56	Daminov S.	Entrepreneur
57	Saidov I.	Electricity Company Worker
58	Sorboni A.	Unemployed
59	Sayfulloev J	Entrepreneur
60	Sayfulloev F.	Unemployed
61	Daminov A	Unemployed
62	Khayrulloev S.	Unemployed
63	Begov M.	Unemployed
64	Saidov A.	Unemployed
65	Saidov R	Forestry Worker
66	Ahmadov R.	Unemployed
67	Solehov O	Unemployed
68	Ulfatov Kh.	Entrepreneur
69	Kamolov D.	Forestry Worker
70	Hakimov Z.	Cultural Worker
71	Sheraliev E.	Accountant
72	Ghafurov S.	Farmer (Head of Farm)
73	Aslonov R	Entrepreneur
74	Kamolov I.	Farmer (Head of Farm)
75	Daminov M.	Pensioner
76	Nodirkhonov Sh	Resettlement Specialist
77	Kholova Kh.	Teacher

Total: 77 people

Male: 54 p or 69,7%

female: 23 p or 30,3%









## PROJECT INFORMATION NOTICE

### Baljuvon – Sari Khosor Road Rehabilitation Project

Implemented by the Ministry of Transport of the Republic of Tajikistan (PIURR) | Financed by the European Bank for Reconstruction and Development (EBRD)

#### Why is this Project Needed?

The existing road between Baljuvon and the Sari Khosor area is approximately 56 km of unpaved track. It is one of the only connections for around 19 communities to healthcare, schools, markets, and government services.

**Every year, snow, landslides, mudflows and flooding cause the road to close for extended periods, leaving communities isolated. The journey can take five to six hours in summer — and is impossible in winter.**

The Project will upgrade this road to a paved, two-lane standard to provide safe and reliable year-round access, improve road safety, and support local livelihoods and tourism in the region.

#### Construction and Design

The main works will include:

- Paving approximately 54–56 km of road to a Category V two-lane standard
- Construction or rehabilitation of 10 bridges and approximately 130 drainage culverts
- **Slope stabilisation, embankment works, and riverbank protection in erosion-prone areas**
- **Road safety features: guardrails, signage, pedestrian crossings, and road markings**
- **Drainage improvements to protect the road from flooding**

Works will follow the existing road corridor as closely as possible to limit new land disturbance. Community access will be maintained throughout construction.

#### Future Consultation

**Your views matter. Consultation will continue throughout the project:**

- **Community briefings before construction begins in each area**
- **Regular updates posted on notice boards in settlements**
- **Engagement meetings during construction to discuss impacts and concerns**
- **A post-construction meeting to review outcomes and maintenance arrangements**

A minimum 30-day public comment period is open following this consultation. Written comments can be submitted to PIURR (details below).

#### Potential Impacts and Mitigation

**Construction will bring some temporary disruption. The table below summarises the main impacts and how they will be managed.**

Potential Impact	Key Mitigation Measures
Dust from earthworks and vehicles	Regular water spraying of active works areas and unpaved haul routes; speed limits near settlements
Noise from machinery and construction traffic	Restricted working hours near homes and schools; community advance notice before noisy works begin
Disruption to road access	Access maintained for communities at all times; advance notice of any planned closures
Land acquisition (agricultural land)	Fair compensation paid under a Land Acquisition and Resettlement Plan (LARP); vulnerable households given additional support
River and water quality	No waste, fuel or chemicals to enter the river; sediment controls at all river-adjacent works
Wildlife and habitats	Works timed to avoid sensitive seasons; Bukhara deer farm at Dushanbe protected by advance notice and buffer distances

#### How to Raise a Concern (GRM)

If you have a concern or complaint about the Project — before, during, or after construction — you have the right to raise it. All complaints are taken seriously and will receive a written response within 14 working days.

You can submit a grievance through any of the following:

- Speak to your Jamoat or local authority representative
- Submit a written complaint directly to PIURR
- Use the complaint box at any active construction site
- Contact the Community Liaison Officer (contact on site notice boards)
- Anonymous complaints are accepted and investigated equally

#### PIURR Contact for Grievances:

Project Implementation Unit for Road Rehabilitation (PIURR)  
Ministry of Transport, Republic of Tajikistan  
Address: 14 Ayni Street, 4th Floor, Dushanbe, Tajikistan  
Tel: + 992 37 222 20 78 | [Email: shodihon@piu.ru](mailto:shodihon@piu.ru)

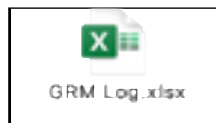
This notice is issued as part of the public disclosure of the Draft Environmental and Social Impact Assessment (ESIA) for the BSK Road Rehabilitation Project. The ESIA has been prepared in accordance with EBRD Environmental and Social Policy requirements. | April 2025



## Annex B: GRM Log

This annex will be used to record all grievances received through the Project's Grievance Redress Mechanism during implementation. Each entry will capture, at a minimum: unique grievance ID, date received, channel of receipt, complainant details (subject to data protection and confidentiality provisions in §7.13), category of grievance, responsible party, actions taken, date of resolution, and complainant feedback on the outcome. A template is provided below for use by the GRC Secretariat.

The log will be maintained by PIURR and made available to the EBRD and External Resettlement Monitor on request.





## Annex C: Stakeholder Comments and Response Matrix (You Said / We Did)



Issue / Comment	Raised by (group)	Date / Location	Response / Action	Responsible party	Where reflected	Status
Employ local workers during construction	Local residents, farmers, drivers	March 2026, various villages	Commitment to prioritise local labour included in contractor requirements	PIURR / Contractor	LMP / ESMP	Committed
Control dust during construction	Local residents	March 2026, various villages	Dust suppression measures (watering, speed limits) included in CESMP	PIURR / Contractor	CESMP	Committed
Avoid blocking road completely during construction	Local residents	March 2026, various villages	Traffic management plan to maintain access at all times; phased works approach	PIURR / Contractor	ESMP / Traffic Management Plan	Committed
Protect water sources and irrigation channels	Local residents	March 2026, various villages	Water source protection measures included in CESMP; natural spring near Chiltori flagged for design consideration	PIURR / Design Team	CESMP / Design	In progress
Ensure road safety for pedestrians and livestock	Local residents	March 2026, various villages	Pedestrian and livestock safety measures included in traffic management and CESMP	PIURR / Contractor	CESMP	Committed
Provide timely information about construction schedules	Local residents	March 2026, various villages	Pre-construction community briefings and ongoing notifications committed to in SEP	PIURR	SEP Section 5	Committed
How will gender aspects be considered by the Project?	Local community (Baljuvon)	20 April 2026, Baljuvon	PIURR committed to preparing a Gender Action Plan for the Project	PIURR	Gender Action Plan (to be prepared)	Committed
Will street lighting be provided in the town?	Local community (Shahidon Jamoat)	20 April 2026, Shahidon Jamoat	PIURR confirmed street lighting will be provided	PIURR / Design Team	Design / ESIA	Committed
How will the overhead electricity network be protected during construction?	Local community (Shahidon Jamoat)	20 April 2026, Shahidon Jamoat	ESIA updated to expand mitigation measures for protection of overhead electricity infrastructure during construction	PIURR / Contractor	ESIA / CESMP	Closed



## Annex D: Grievance Application Form

Application form	
Name of the applicant _____	
Mobile Phone number: _____	
Email / Residence Hukumat _____ Jamoat _____ Village _____	
Language for communication: Tajik Russian Other: _____ (please clarify)	
Date of application _____	Date of acceptance _____
Please explain the reason for your application in detail. Use additional pages if necessary Provide copies of relevant documents, if available.	
<b>Complainant:</b>  Full Name _____  Signature _____  Date _____	<b>Accepted:</b>  Full Name _____  Signature _____  Date _____

