Democratic Republic of Timor-Leste

Second Timor-Leste Branch Road Project (P516518)

Stakeholder Engagement Plan (SEP)

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List of Abbreviation

Abbreviation	Full Term
ANLA, E.P.	Autoridade Nacional para o Licenciamento Ambiental (National Environmental Licensing Authority, I.P.)
CBET	Community-Based Ecotourism
DGRBFPC	Directorate-General for Roads, Bridges and Flood Prevention and Control, Ministry of Public Works
DNCPIA	National Directorate of Pollution Control and Environmental Impact Assessment
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGD(s)	Focus Group Discussions
GBV	Gender-Based Violence
GFPP	Grant Facility for Project Preparation
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
HSE	Health, Safety and Environment
LARAP	Land Acquisition and Resettlement Action Plan
LMP	Labor Management Procedures
MALFF	Ministry of Agriculture, Livestock, Fisheries, and Forestry
MPW	Ministry of Public Works
NGO(s)	Non-Governmental Organizations
PAP(s)	Project-Affected Party/Parties
PIC	Person-in-Charge
PMU	Project Management Unit
PNAP	Plano Nacional de Áreas Protegidas (National Protected Areas Plan)
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEIS	Simplified Environmental Impact Statement
SEP	Stakeholder Engagement Plan
SNAP	Sistema Nacional de Áreas Protegidas (National System of Protected Areas)
STI	Sexually Transmitted Infection
TLBRP	Timor-Leste Branch Roads Project
TPMA	Third-Party Monitoring Agent
USD	United States Dollar

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1. Introduction

Timor-Leste continues to strengthen its economic and social development while addressing challenges related to poverty reduction, economic diversification, and limited access to infrastructure, particularly in rural and mountainous areas. Improving transport connectivity is important to expand access to markets, services, and economic opportunities for communities. In this context, the Second Timor-Leste Branch Roads Project (TLBRP2), implemented by the Ministry of Public Works (MPW), aims to improve road connectivity, safety, and climate resilience along the Gleno–Maubisse Corridor. The Project includes upgrading the Aituto–Hatubuilico Junction Road and the Hatubuilico Junction–Ramelau Sanctuary Road, as well as designing the Oelue–Fatumea Road.

Implementation of these activities may affect communities and other stakeholders along and around the project corridors and will require their active participation throughout the project life cycle. Inclusive and meaningful stakeholder engagement is essential to ensure that affected communities and other stakeholders are adequately informed, have opportunities to express their views and concerns, and can contribute to project planning and implementation. Early, meaningful engagement can help the Project understand local conditions and community needs, identify potential environmental and social risks, strengthen stakeholder relationships, and address concerns in a timely and transparent manner.

To support these objectives, the Stakeholder Engagement Plan (SEP) is prepared prior to project implementation. The SEP establishes the approach and procedures for identifying and engaging project-affected and interested stakeholders, disclosing relevant project information, conducting meaningful and culturally appropriate consultations, receiving and responding to feedback, and maintaining constructive relationships throughout the Project life cycle. It is aligned with applicable Timor-Leste laws and regulations and the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure and fulfils the relevant commitment under the Environmental and Social Commitment Plan (ESCP).

The SEP applies to the Project Management Unit (PMU), consultants, contractors, and other parties involved in project implementation. It also establishes arrangements for stakeholder feedback and the project-level Grievance Redress Mechanism (GRM), as well as responsibilities for documenting, monitoring, reporting, and periodically updating engagement activities. Through these arrangements, the SEP seeks to promote transparent, inclusive, and meaningful participation and ensure that stakeholder views and concerns are appropriately considered throughout project preparation, construction, and operation.

2. Project Description

Implemented by MPW, TLBRP2 aims to improve resilient transport connectivity and enhance market access for agricultural producers along selected sections of the Gleno–Maubisse corridor. It is expected to make the Gleno–Maubisse corridor more resilient to climate-related damages, such as landslides and floodings so that it can provide year-round access, including during and after extreme weather events. The project is expected to directly benefit an estimated 211,000 people (about 16 percent of Timor-Leste's population) who live in the Ainaro and Ermera

municipalities along the project roads. These communities are expected to see shorter, safer, and more reliable journeys, along with a boost to local farming and tourism activity.

This project comprises two components:

- Component 1: Gleno–Maubisse Corridor Upgrading.
  This component aims to improve two road sections so they can better withstand heavy rain and landslides, and to make them safer to travel. Work includes repaving and widening the roads, improving drainage and culverts so water flows away safely, stabilizing slopes to reduce landslide risk (including with plants and vegetation), and adding road-safety features. The activities cover:
  - Sub-component 1.1: Aituto–Hatubuilico Junction Road upgrading.
    This subcomponent will upgrade the Aituto–Hatubuilico Junction Road (12 km) of the Gleno–Maubisse corridor to national road standards (6 m carriageway, 2 m shoulders, and 1 m drainage) and will provide for maintenance of the road for three years after the defect liability period. Interventions will include (i) pavement upgrading with selective widening to bring the project road to the national road standards, (ii) culvert and drainage improvement to adapt to the forecasted increases of rainfall volumes and intensities, (iii) slope stabilization structures, including installing bioengineering measures, and (iv) road safety improvements.

  - Sub-component 1.2: Hatubuilico Junction–Ramelau Sanctuary Road upgrading. This subcomponent will upgrade the Hatubuilico Junction–Ramelau Sanctuary Road (5.4 km) of the Gleno–Maubisse corridor to municipal roads standards (5 m carriageway, 2 m shoulders, and 1 m drainage) and will provide for maintenance of the road for three years after the defect liability period. Interventions will include (i) pavement upgrading with selective widening to bring the project road to the municipal road standards, (ii) culvert and drainage improvement to adapt to the forecasted increases of rainfall volumes and intensities, (iii) slope stabilization structures, including installing bioengineering measures, and (iv) road safety improvements.

- Component 2: Institutional Strengthening. This component will finance assessment, detailed designs, bidding documents, and E&S instruments required for the preparation of potential future investments in the road sector, including those for the Oeleu–Fatumea road (54 km). The component would also finance activities to strengthen MPW's capacity in road asset management and maintenance.

- Component 3: Project Management Support. This component will support effective project coordination, procurement, financial management, E&S risk management, contract management, monitoring and evaluation, and stakeholder engagement. Although fully financed by the Government, the component is included to reflect the project's full scope and provide a complete account of the institutional resources required for effective implementation.

The project is located in western Timor-Leste, along the Gleno–Maubisse road corridor, covering the Ainaro and Ermera municipalities. This corridor links to other major roads connecting Dili to Ainaro and Gleno to Tibar and provides access to some of the country's main coffee-growing areas and to Mount Ramelau, a popular tourist destination. Because the area is mountainous, it is especially prone to landslides, erosion, and flooding, which is why building in more climate resilience is a priority.

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3. Objective/Description of SEP

The stakeholder engagement plan is part of the project's environmental and social (E&S) risk management and sets out how the project will identify, engage, and maintain engagement with stakeholders throughout the project life cycle, from project preparation and design through construction and operation of the upgrading Aituto–Hatubuilico Junction road, the upgrading of the Hatubuilico Junction-Ramelau Sanctuary Road, and the design of the future Oelue-Fatumea Road. For a road project involving civil works and communities located along and around the project corridor, early and continuous engagement is particularly important to understand local conditions, identify potential E&S risks, address community concerns, and incorporate relevant local knowledge into project planning and implementation. The SEP will guide the relevant implementing agencies and project personnel, including the PMU, construction supervision consultants, contractors, and other parties involved in project implementation. It will also provide a common framework for engaging project-affected communities, local authorities, government institutions, Civil Society Organizations (CSOs), road users, businesses, workers, vulnerable groups, and other interested stakeholders.

The SEP will be treated as a living document and will be reviewed and updated as project activities progress, stakeholder interests and risks evolve, and additional information becomes available.

3.1 Purpose and Objective of SEP

The overall purpose of the SEP is to establish a framework for meaningful stakeholder engagement throughout the Project's life cycle. More specifically, the SEP is intended to:

- Provide a structured approach for identifying project stakeholders that may be directly or indirectly affected by the Project;
- Establish appropriate arrangements for timely, accessible, and culturally appropriate disclosure of project information;
- Facilitate two-way communication and meaningful consultation with Project-Affected People (PAP) and other interested stakeholders;
- Provide opportunities for stakeholders to raise questions, concerns, and suggestions regarding project activities, potential impacts, and mitigation measures;
- Ensure that stakeholder feedback is documented, assessed, and, where appropriate, incorporated into project design and implementation;
- Facilitate engagement with vulnerable or disadvantaged groups that may face barriers to participation or may be disproportionately affected by project activities;
- Provide accessible channels through which grievances and complaints related to the Project can be raised and addressed; and
- Establish responsibilities, monitoring, documentation, and reporting arrangements to support effective implementation of stakeholder engagement activities.

The main objective of the SEP is to ensure timely, transparent, inclusive, and meaningful engagement with stakeholders throughout the Project life cycle. It aims to identify and understand project-affected and interested stakeholders; provide accessible and culturally appropriate information; facilitate meaningful consultation and participation in project planning and implementation; ensure that stakeholder concerns and feedback are documented and addressed; provide particular attention to vulnerable and disadvantaged groups; establish accessible grievance and feedback mechanisms; and define clear responsibilities and arrangements for implementing, monitoring, and updating stakeholder engagement activities.

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3.2 Principles of Stakeholder Engagement

Stakeholder engagement for this project will be guided by the following principles:

a) Early and Continuous Engagement: Engagement will begin early and continue throughout the project life cycle to build constructive relationships with stakeholders.
b) Openness and Transparency: Engagement will be conducted openly and transparently, free from coercion or intimidation, with stakeholder concerns addressed in a timely manner.
c) Informed Participation and Feedback: Relevant and accessible project information will be disclosed, and stakeholders will have opportunities to provide feedback and raise concerns, which will be documented and addressed.
d) Inclusiveness: All stakeholders will have equitable opportunities to participate, with particular attention to vulnerable and disadvantaged groups.
e) Respect for Culture and Rights: Engagement will respect stakeholders' rights, cultural values, traditions, interests, and local social and gender contexts.
f) Flexibility and Accessibility: Engagement methods will be adapted to stakeholder needs and local circumstances, including the use of alternative communication methods where necessary.
g) Meaningful Dialogue and Trust: Engagement will promote two-way communication, mutual respect, trust, and consideration of stakeholder views in project planning and implementation.

4. Applicable Regulatory Framework

Stakeholder engagement and information disclosure for this project have been prepared in accordance with the applicable legal and regulatory framework of Timor-Leste and the World Bank ESF, particularly ESS10 on Stakeholder Engagement and Information Disclosure. While Timor-Leste has no standalone, cross-sector law on stakeholder engagement, relevant environmental, local governance, and constitutional provisions require public participation and consultation.

At the national level, the Constitution of Timor-Leste (2002), section 27, recognizes the right to a healthy environment and provides avenues for citizens to raise complaints concerning public bodies through the Ombudsman. The Basic Environment Law (Decree-Law No. 26/2012) and the Environmental Licensing Decree-Law No. 5/2011, as amended by Decree-Law No. 39/2022, primarily govern environmental assessment and public consultation. These establish the environmental assessment and licensing framework and provide for public consultation and disclosure of environmental assessment documentation. Ministerial Decision No. 47/2017 further sets out procedures for public consultation during environmental assessment, including consultation on environmental assessment and management documents. At the community level, the Law of Sucos (Law No. 9/2016) provides a recognized institutional structure for community participation through Suco Councils, including representation of women, youth, and traditional authorities.

In addition to national requirements, the Project will apply World Bank ESS10, which requires stakeholder engagement throughout the project life cycle and in a manner proportionate to the nature, scale, and potential environmental and social risks of the Project. ESS10 requires timely, accessible information disclosure; meaningful, culturally appropriate consultation; attention to

vulnerable and disadvantaged groups; documentation of stakeholder engagement and feedback; and an accessible project-level grievance mechanism.

Accordingly, this SEP will use established national and local mechanisms as key entry points for engagement, while ensuring continued engagement throughout project preparation, construction, and operation. It will also provide additional arrangements for inclusive participation, differentiated engagement with vulnerable groups, systematic documentation and response to feedback, and a project-level grievance mechanism.

5. Stakeholder identification and analysis per project component

Stakeholders were identified and analysed through a combination of desk review and field-level input: review of the demographic baseline, review of the institutional and administrative structure of the project area, and consultation with PMU and community leadership to confirm which local groups and institutions should be considered project stakeholders. Consistent with ESS10, identified stakeholders were then categorized into affected parties, other interested parties, and disadvantaged or vulnerable individuals or groups, and assigned an engagement priority based on the degree to which they are directly affected by project impacts, their role in facilitating or representing community engagement, and whether they require differentiated engagement measures to participate meaningfully. This categorization is reviewed and updated as the project progresses and as new stakeholders (for example, if specific PAPs identified through the land/asset census) are confirmed.

5.1. Affected parties.

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the Project, positively or adversely.
Specifically, the following individuals and groups fall within this category:

Tabel 1. Identification and Analysis of Project Affected Parties[1]

Affected parties	**Interest / Relevance to the Project**	**Priority level**
Component 1: Gleno–Maubisse Corridor Upgrading		
Subcomponent 1.1: Aituto–Hatubuilico Junction road upgrading		
Households and residents, and landowners in Suco Horai-Quic, Mulo and Nunomogue	Communities living along or adjacent to the road right-of-way. Direct beneficiaries of improved access. Directly affected by land/asset impacts, construction disruption (noise, dust, access), and potential employment opportunities.	High

[1] Table 1 presents the affected parties identified along the Gleno–Maubisse corridor, categorised by Project component and sub-component. It draws on the suco-level consultations held between September 12 and 26, 2018 (eleven sucos, about 450–500 participants), the site-specific concerns recorded in the DED Report (pp. 91–97), and the socio-economic baseline (population, agriculture, tourism, and poverty data) presented in Sections 4.5 and 6.3–6.4 of the SEIS/ESIA.

Smallholder farmers and horticulture producers	Depend on the road to move produce to markets and onward to Dili. Direct beneficiaries of reduced transport time and cost. Exposed to temporary access disruption during construction.	High
Road users, public/para-transit operators and small roadside business owners along the corridor	Long-term beneficiaries of improved road condition. Potential beneficiaries of increased traffic post-construction. Temporary access and traffic disruption during construction, safety and reliability. Economic activity affected by construction disruption.	Moderate
Students, school and health post staff and communities, along the alignment	Beneficiaries of proposed footpaths, wider shoulders and safety signage near services/ facilities. Potential beneficiaries of increased traffic post-construction. Exposed to construction disruption, traffic, dust and safety risks.	Moderate
Owners/custodians of customary houses (Uma Lulik), sacred sites, Haeluli (holy water and tree), Hautsau (historical altar stone) in Horai-Quic Suco; public water sources in Mulo Suco	Direct risk of physical or cultural impact from road widening and slope works; require avoidance and protection measures reflected in the detailed design and ESMP.	High
Households on or near landslide-prone slopes flagged by the Cefe de Suco of Mulo	At risk from slope-cutting and instability during construction; require geotechnical assessment and mitigation (e.g., retaining structures, bioengineering).	High
Owners/users of water supply infrastructure (pipelines, tanks, springs) adjacent to the alignment	Facilities require identification, protection and/or relocation prior to construction; risk of service disruption if not managed.	High
Customary/traditional authorities or leaders	Custodians of customary land and cultural/sacred sites, including the horizontal cave valued by Horai-Quic and Mulo communities	High
Subcomponent 1.2: Hatubuilico Junction–Ramelau Sanctuary road upgrading		
Residents and households along the Hatubuilico Junction–Ramelau Sanctuary alignment	Communities living along or adjacent to the road right-of-way. Direct beneficiaries of improved access to Mt Ramelau. Directly affected by land/asset impacts, construction disruption (noise, dust, access), and potential employment opportunities.	High
Farmers and coffee/horticulture producers in the Hatubuilico area	Beneficiaries of more reliable, year-round access to markets, processing points and agriculture value chains, including coffee. Exposed to temporary access disruption during construction.	High
Community-based ecotourism (CBET) operators — lodges, restaurants and handicraft producers in Maubisse and Hatubuilico	Direct beneficiaries of increased and more reliable visitor access; some may face temporary disruption to access/trade during construction.	Moderate

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Pilgrims, hikers and visitors to the Mt Ramelau summit and sanctuary	Beneficiaries of safer, improved access to the country's foremost tourism and religious destination. Exposed to temporary access disruption during construction.	Moderate
Communities and resource users associated with the Mt. Ramelau Protected Area / Important Bird Area boundary	Potential sensitivity to construction activity, slope cutting and disposal near the protected-area boundary; require impact avoidance measures and coordination with SNAP/PNAP.	High
Component 2: Design of Future Projects - Prepare Engineering designs and environmental and social studies to prepare possible future road projects, potentially for the Oeleu–Fatumea road (about 54 km).		
Communities and households along the prospective Oeleu–Fatumea corridor *(*to be confirmed through the forthcoming site-specific ESIA*)	Potential future PAPs once topographic survey, geotechnical investigation and detailed design are carried out; early engagement needed to inform design choices.	High
Landowners and land users within the prospective right-of-way	Potential future land acquisition/resettlement impacts, to be assessed and addressed through a future site-specific LARAP prepared alongside the detailed design.	High
Suco and customary leaders along the prospective corridor	Representatives of affected communities for future consultation on alignment, land and cultural-heritage matters.	High
Project wide (all Components)		
MPW	Implementing Agency; overall responsibility for planning, developing and maintaining the national and municipal road network.	High
Suco and Aldeia leaders and customary/traditional leaders (Horai-Quic, Mulo, Nunomogue, and other suco leaders along the Hatubuilico Junction-Sanctuary Road and Oeleu-Fatumea Road)	Primary channel for community consultation, land matters and protection of cultural heritage sites; representative of several hundred families along the alignment. Represent community interests, coordinate local recruitment, first point of contact for the community GRM	High
Municipality Administration; Administrative Posts	Local governance oversight and coordination role Local government coordination, community liaison and support to consultation and grievance processes.	High
Civil Works Contractor, subcontractors, and construction supervision consultants	Direct responsibility for on-the-ground community liaison, GRM operation and Code of Conduct implementation. Responsible for implementing ESMP/Contractor ESMP requirements; require environmental permits/licenses for extraction and processing sites.	High
Ministry of Social Solidarity and Inclusion	Coordinates the national GBV referral network	Moderate
State Secretary of Art and Culture	Oversight of cultural heritage protection, including any chance finds	Moderate

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5.2. Other interested parties.

Other interested parties who may have an interest in the Project. They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Tabel 2. Identification and Analysis of Other Interested Parties[2]

Other interested parties	Interest / Relevance to the Project	Engagement Priority
Component 1: Gleno–Maubisse Corridor Upgrading		
Religious authorities and pilgrimage organizers (Mt. Ramelau/Foho Ramelau)	The Sanctuary-access section serves pilgrimage traffic to a nationally significant religious site; scheduling and cultural sensitivities apply	Moderate
Ministry of Agriculture, Livestock, Fisheries, and Forestry (MALFF), including the National Directorate of Protected Area	Interest in the boundary and management of the Mount Tatamailau (Ramelau) Protected Area and forest resources adjoining Sub-component 1.2.	Moderate
Ministry of Tourism, Arts and Culture	Interest in the horizontal cave at KM 3+000 and tourism development, including CBET, around Hatubuilico and Mount Ramelau as a tourism/pilgrimage destination	High
Ministry of Education	Interest in school safety and access along the alignment	Moderate
Ministry of Health	Interest in access to health facilities and management of construction-related public-health risks (e.g., communicable diseases, HIV/STIs).	Moderate
Historic society, resistance groups, etc.	Interest in the horizontal cave at KM 3+000.	High
Component 2: Design of Future Projects		
MPW/DGRBFPC (project-preparation function)	Sponsor of the prospective Oeleu–Fatumea investment; requires completed E&S instruments prior to future appraisal/financing.	Moderate
Design consultants	Preparation of topographic survey, geotechnical investigation, detailed engineering design and E&S risk-management instruments for the Oeleu–Fatumea road.	Moderate

[2] Table 2 presents the affected parties identified along the Gleno–Maubisse corridor, categorised by Project component and sub-component. It draws on the suco-level consultations held between September 12 and 26, 2018 (eleven sucos, about 450–500 participants), the site-specific concerns recorded in the DED Report (pp. 91–97), and the socio-economic baseline (population, agriculture, tourism, and poverty data) presented in Sections 4.5 and 6.3–6.4 of the SEIS/ESIA.

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Municipal and Suco-level authorities along the prospective Oeleu–Fatumea corridor	To be consulted during the forthcoming feasibility and design studies; interest in how the future alignment affects their constituencies.	Moderate
Project-wide (both Components)		
National Environmental Licensing Authority, I.P. (ANLA, Autoridade Nacional para o Licenciamento Ambiental)	National environmental licensing authority; reviews and clears the SEIS/ESIA and monitors implementation of the ESMP.	High
National Directorate for Land Transport, Ministry of Transport and Communication; Traffic Police, Ministry of Interior	Shared responsibility for road-safety regulation and enforcement along the project roads.	Moderate
National Directorate of Land, Property and Cadastral Services	Land administration authority; supports resolution of land claims and implementation of LARAPs.	Moderate
Civil-society and community organisations	Interest in environmental protection, gender equality and community welfare potential partners in consultation and monitoring.	Moderate
Non-Governmental Organizations (NGOs) related to the environment and cave exploration	Interest in environmental protection, including horizontal cave protection.	High
Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) service providers	Direct interest in the Project as the designated referral pathway for Gender-Based Violence (GBV), SEA/SH survivors arising from Project activities. Their involvement is essential for safe, confidential case management and for strengthening the Project's GRM and SEA/SH Action Plan through referral protocols and monitoring.	High
University/ Academicians/ Think tanks	Collaboration on geological assessments, potential technical partner on geotechnical, climate-resilience and agricultural aspects of the corridor; monitor project implementation and provide feedback.	Moderate
National and local media (e.g.: state news agency, radio, private media)	Interest in monitor project implementation. Practical channel for the Project's information disclosure and public communications	Moderate

Tables 1 and 2 above outline an initial stakeholder mapping, subject to further assessment once the project activities and targets for all components have been confirmed. The list of affected and other interested stakeholders will continue to be updated as the project develops.

5.3. Disadvantaged/vulnerable individuals or groups

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The affected and interested stakeholders may also include disadvantaged/vulnerable individuals or groups requiring differentiated engagement. As mapped in Table 1 above, the vulnerable or \disadvantaged groups may include but are not limited to the following:

- Women and female-headed households across the project corridor. Historically under-represented in project consultations, and differentiated benefits (market access, school access, safety) and risks (GBV/SEA/SH, traffic safety, unequal access to compensation and employment). Female-headed households are especially vulnerable to economic shocks, and temporary land acquisition impacts due to limited labour availability and reliance on subsistence farming.
- Poor and vulnerable households: Highest sensitivity to livelihood disruption and asset loss, priority group for the GRM and livelihood-restoration support. Temporary loss of roadside vending spots, minor land acquisition affecting crops or fruit trees, or temporary access blockages to local markets can severely impact household food security and daily income.
- Persons with disabilities (PWDs): Limited baseline data currently available, but require accessible facilities (ramps, sidewalks, rest points) and inclusive consultation methods. PWDs face physical safety risks during road construction, risk exclusion from local hiring programs, and require universal access features (such as low-gradient pedestrian ramps and continuous paved shoulders) in final engineering designs.
- Children and Youth: Children and youth make up nearly half of the local population across the project corridor. During civil works, children face heightened risks from road traffic hazards, construction equipment, dust emissions, and noise, particularly near school zones and along the high-traffic route leading to the Ramelau Sanctuary.
- Elderly Persons (Aged 60+): During project implementation, the elderly face heightened safety risks in built-up sections or steep terrain lacking dedicated sidewalks, wide shoulders, or safe pedestrian crossings, and may struggle to navigate temporary construction detours.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections

6. Stakeholder Engagement Program

The engagement program is organized by project stage, with methods tailored to each stakeholder group and to the two distinct sections of works.

6.1 Summary of Previous Stakeholder Engagement

Stakeholder engagement to date has mainly occurred as part of the broader Gleno-Maubisse corridor. A project-awareness-level series of consultations was held across 11 sucos in 2018 along the full Gleno–Maubisse corridor, including Horai-Quic, Mulo and Nunumoge. The stakeholders consulted for the Project included PAPs such as communities, local authorities, suco leaders, customary leaders, national authorities, agricultural and forest institutions, educational institutions, and other interest groups. The resettlement team also conducted ad hoc consultations, Focus Group Discussions (FGDs), and meetings with potentially affected parties before conducting the Land Acquisition and Resettlement impacts assessment. Another suco-level consultation was held in August 2022 to disclose and discuss the Land Acquisition and Resettlement Action Plan (LARAP), Environmental and Social Impact Assessment (ESIA), and GBV mitigation measures for the broader Gleno-Maubisse corridor. The consultation involved local authorities and community representatives in several Sucos, including Suco Nunumoge and

Suco Mulo in Section 1, with the main agenda being to disclose and discuss the resettlement/land-acquisition process and compensation, environmental mitigation measures, GBV, SEA/SH risks, the Code of Conduct, local GBV service providers, and how to access the GRM. A specific round of engagement for Section 1 was carried out in September 2026 alongside the field observation, but was limited to introductory awareness, gathering assessment information from Suco authorities in the affected Sucos, a field observation along the corridor, and a sample census with affected parties to provide input for LARAP. Based on this round of engagement, the Suco authorities welcomed and supported the project and expressed no concerns, noting that the community has waited many years for this road and that they had already heard about the project in 2019.

6.2 Summary of project stakeholder's needs and methods, tools and techniques for stakeholder engagement.

Stakeholder needs fall into three broad tiers that scale with proximity to the works and the formality of the relationship with the Project. Affected communities and vulnerable groups along the road corridor mostly need face-to-face, Tetum-language engagement delivered close to where they live, timed around their livelihoods, and backed by an accessible grievance mechanism. Government counterparts and financiers need formal, documented engagement tied to regulatory and disbursement milestones, while academia, think tanks, media and civil society sit in between, needing reliable access to project information for independent review, technical input or public communication rather than intensive direct consultation.

The stakeholder engagement methods, tools and techniques are tiered accordingly: suco-level public consultations, FGDs , notice boards and a multi-entry-point GRM for directly affected and vulnerable households, supplemented by radio broadcasts to reach remote and low-connectivity sucos; scheduled coordination meetings and formal written disclosure of safeguard instruments for government agencies and financiers; and proactive document disclosure, technical briefings and media engagement for academia, think tanks and press.

6.3 Proposed strategy for consultation

Project Stage	**Target Stakeholders**	**Topic of consultation**	**Methods**	**Timing / Responsible**
Project Preparation	PAPs, suco/customary leaders, women, persons with disabilities	- Project Design and Activities - ESIA/ESMP/LARAP/ Scoping Report Preparation (gather input on impacts and mitigation, share findings, validate baseline data) - land rights, assets and valuation procedures - location for ancillary sites such as borrow pits and spoil disposal	Suco-level consultation meetings; sex-disaggregated FGDs; key informant interviews with customary/religious leaders; disclosure of draft findings	Prior to appraisal / PMU E&S Specialist

Pre-Construction / Mobilization	PAPs, all corridor communities, prospective workers, interested stakeholders (NGOs, etc)	Works schedule, recruitment process, worker Code of Conduct, E&S risk mitigation measures and plans (ESMP), and how to use the GRM	Community information sessions; notice boards; announcements through suco chiefs	2–4 weeks before mobilization / contractor, construction supervision consultants, and PMU
	PAPs, customary/religious leaders, pilgrimage organizers, interested stakeholders (NGOs, etc)	Cultural heritage protection and pilgrimage-season scheduling	Dedicated consultation with customary/religious leaders; site-specific review of the cave and other sacred sites	Prior to and during specific high-risk section works / PMU, construction supervision consultants, and contractor
Construction	PAPs, all corridor communities, interested stakeholders (NGOs, etc)	Ongoing liaison, manage concerns as they arise, monitor labor-influx and GBV-related effects	Regular suco chief liaison meetings; GRM operation; periodic community feedback check-ins	Throughout construction / Contractor's Community Liaison, construction supervision consultants, and PMU
Operation	All corridor communities	Gather feedback on road safety and service-delivery outcomes; close out residual issues	Post-completion community feedback session	Post-construction / PMU

6.4 Proposed strategy for information disclosure

Project information is disclosed in a form, language and location accessible to the corridor communities, recognizing variable literacy levels and limited internet access in the project area.

Document / Information	**Disclosure Method**	**Language(s)**	**Location / Timing**
Draft Project Concept Note, ESIA / ESMP / LARAP/ Scoping Report	Public consultation meetings; printed summaries at suco offices	Tetum (verbal/summary), English (full document)	Prior to finalization
Summary of Project Documents, ESIA / ESMP / LARAP / Scoping Report	Posted at suco council and municipal offices; PMU websites	Tetum executive summary and	Upon approval

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		English full document	
Works schedule and traffic management arrangements	Notice boards; suco chief announcements, radio broadcast	Tetum	2 weeks before works start in each section
Worker Code of Conduct and conduct expectations	Community awareness session	Tetum	Prior to mobilization
GRM information (how to file a complaint)	Printed flyers; suco notice boards; verbal briefing at consultation meetings; radio broadcast	Tetum	Ongoing, displayed throughout construction
Monitoring/progress reports (non-technical summary)	Shared at community liaison meetings	Tetum	Quarterly
Project periodic reports, summary of grievance log	Posted at suco council and municipal offices; PMU websites	Tetum	Six-monthly/ Annually

6.5 Proposed strategy to incorporate the views of vulnerable groups

The following groups require differentiated engagement approaches, beyond standard suco-level public meetings, to ensure their views are genuinely captured:

- Women: separate, sex-disaggregated FGDs facilitated by female project/PMU staff, held at times and locations that accommodate women's caregiving and livelihood schedules.
- PWDs: accessible meeting venues, outreach through suco social welfare contacts to identify persons with disabilities who may not attend general meetings, and alternative engagement formats (small-group or household-level) where needed.
- Elderly residents and female-headed households: household-level follow-up where general meeting attendance is not feasible.
- Children and youth: parent's consent and safeguarding, school-based child-friendly sessions, youth focus groups.
- Customary and religious authorities: engaged through culturally appropriate protocols (e.g., through Rai Nain land custodians and Lia Nain for land/cultural matters, and through religious leaders for Sanctuary-related pilgrimage matters).
- Potential GBV/SEA/SH survivors: engagement on GBV-related topics follows the survivor-centred, confidential approach described in the Labor Management Procedures (LMP), never through open community forums

7. Resources and Responsibilities for implementing stakeholder engagement

The Project Manager of PMU holds overall responsibility for SEP implementation. The The National Environmental Specialist (Mrs. Adelina do Rego) will be in charge of stakeholder engagement activities, including consultation planning, disclosure coordination, GRM management, and monitoring SEP implementation.

The project's stakeholder engagement implementation arrangements are as follows:

- PMU National Environmental Specialist: ensures the overall implementation of the stakeholder engagement plan (consultation and information disclosure strategies, GRM); monitors, documents, and reports the implementation, and leads overall coordination related to SEP.
- Social Specialist at Construction Supervision Consultants: supports community liaison at project sites and verifies Contractor engagement performance during construction.
- Contractor's Community Liaison Officer (or the HSE/Social Officer): day-to-day community liaison during construction, coordination with suco chiefs, and support to the community GRM.

The stakeholder engagement activities will be documented in a six-monthly report integrated with the ESCP report.

The budget estimate for preparing and implementing SEP is USD 26,000. The budget includes a specific line item for consultation logistics (venue, transport for facilitators, translation/disclosure materials) that will be included in the project's E&S management budget. The budget breakdown can be found in Annex 2.

8. Grievance Redress Mechanism

The GRM in this SEP adopts PMU's existing GRM Manual that has been used for other TLBRP road sections of the broader Gleno-Maubisse corridor. This GRM is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

- **Principles of GRM**

The GRM is designed and operated in accordance with the following principles: confidentiality and anonymity, legitimacy, knowledge sharing, accessibility, cultural sensitivity, and equity. To uphold these standards, the mechanism ensures confidentiality and anonymity by safeguarding complainant identities and assisting illiterate users, while establishing legitimacy through fair, accountable, and interference-free proceedings. It drives knowledge sharing through active awareness campaigns on procedures and safety, maintains accessibility by removing language, geographic, and literacy barriers down to the suco level, honours cultural sensitivity by engaging traditional leadership structures (*xefe suco* / *lia nain*), and guarantees equity by providing aggrieved parties with the information and support needed to participate on fair terms. For GBV/SEA/SH cases specifically, the guiding principles of confidentiality, survivor centricity, non-discrimination, respect, access to services, and survivor safety apply to every case.

- **Grievance Mechanism implementation Structure**

PMU has established a two-tier GRM system, with Grievance Redress Committees (GRCs) formed at the Section (site) level and at the PMU (central) level in Dili:

- ❖ Level 1 - Section (site) GRC: Established for each active road section (e.g., Section 2, Hatobuilico–Letefoho; Section 3, Letefoho–Gleno). Chaired by the Section's Site Engineer, with community representation. Handles grievances arising directly from construction activities within that section.
- ❖ Level 2 - PMU GRC: The central GRC based at the PMU in Dili. Comprises four members to ensure grievances are processed, analysed, monitored, and resolved in line with World Bank

and MPW standards. Receives escalated cases and all GBV/SEA/SH-related grievances. The PMU has appointed a National Environmental Specialist as the GRM Focal Point, dedicated to the project, who facilitates GRC meetings and manages case handling.

- **Grievance Uptake**

Stakeholders may submit grievances or inquiries about any element of project, without restriction, through the following uptake channels:

- ❖ Complaint/suggestion boxes: placed in visible locations at schools, churches, construction supervision consultants' camps, contractor camps, and suco offices along each project section.
- ❖ Personal visit: complainants may submit a grievance in person to any Section-level or PMU-level GRC, including orally or in writing during field meetings.
- ❖ WhatsApp number: a dedicated project GRM WhatsApp number to receive text and voice-recorded grievances.
- ❖ Written petition: submitted directly to a Section-level GRC or to the PMU-level GRC.
- ❖ Email: TLBRP.complaints@mpw.gov.tl

The PMU will also explore and integrate existing community-level grievance channels, including suco complaint boxes checked weekly by the network GRC, and any relevant channels operated by MPW's Central Office, to strengthen overall GRM coverage.

- **Grievance Procedures**

The grievance procedures consist of six steps:

Step 1: Uptake - Stakeholders may provide feedback and report complaints through any of the channels listed above. The complainant may select the most accessible and effective channel and may bypass channels perceived as unresponsive or biased. Anonymous grievances are accepted at every channel. All uptake channels accept grievances in Tetum, Portuguese, English, and Bahasa Indonesia.

Step 2: Sorting and processing - All grievances received are transferred to the GRM Focal Point at the PMU from each Section GRC and entered into the central grievance spreadsheet to enable tracking and review. The GRM Focal Point categorizes the complaint and forwards it to the responsible unit, recording it in the standard registration format.

Step 3: Acknowledgement and follow-up - Within 3 working days of a grievance being submitted, the GRM Focal Point communicates with the complainant, providing information on the likely course of action and anticipated timeframe for resolution, including the escalation procedure and estimated timeline for each stage, if required.

Step 4: Verification, investigation, action, and documentation - This step involves gathering information to determine the facts, verifying the validity of the grievance, and developing a proposed resolution. Most grievances are expected to be resolved at this stage. All activities are fully documented, and any resolution is logged in the register. Unresolved grievances are escalated to the next tier.

Step 5: Monitoring, evaluation, and reporting - Monitoring tracks grievances and assesses progress toward resolution. The PMU maintains a grievance register recording all steps taken to resolve grievances or otherwise respond to feedback. GRM data is collated and reported monthly at all levels, with a quarterly progress report on ESMP implementation submitted to the World

Bank, including grievance nature, type, status, and information on dissemination, oversight, and training. Where engaged, a Third-Party Monitoring Agent (TPMA) provides an independent operational review of overall project implementation and results, including implementation of the SEP and GRM, synthesized into an overall environmental and social progress report with a distinct section on stakeholder engagement.

Step 6: Providing feedback - This step involves informing complainants of the resolution reached. Wherever possible, complainants are informed in person, allowing follow-up questions. If not satisfied with the resolution, the complainant is informed of further options, including approaching MPW's Ethics and Integrity focal point or the World Bank's Grievance Redress Service directly. The GRM does not prevent access to judicial and administrative remedies. Each complaint must be closed within 60 days of receipt — resolved, withdrawn, or escalated.

The table below describes the flow of a grievance from receipt to closure.

Step	**What Happens**	**Who is Responsible**
1. Uptake	Grievance received via complaint box, personal visit, WhatsApp, petition, or email	Any GRC member, contractor/consultant liaison staff, or PMU staff
2. Initial screening	Is the grievance GBV/SEA/SH-related?	Receiving staff, in consultation with Section GRC Chair
3a. Non-GBV/SEA/SH pathway	Logged in Section GRC logbook; sorted and categorized; forwarded to central spreadsheet	Section GRC
3b. GBV/SEA/SH pathway	Escalated within 48 hours to PMU-level GRC; Incident Report completed and sealed	Section GRC Chair, Gender Specialist/GRM Focal Point
4. Acknowledgement	Complainant contacted within 3 working days with expected timeframe	GRM Focal Point
5. Verification and investigation	Facts gathered; validity assessed; resolution proposed	Section GRC or PMU GRC, as applicable
6. Resolution or escalation	Resolved within 10 days (Section level) or 15 days (PMU level); unresolved cases escalate	Section GRC / PMU GRC
7. Feedback to complainant	Complainant informed of outcome and further options if unsatisfied	GRM Focal Point
8. Closure and reporting	Case closed within 60 days; recorded in quarterly report to World Bank	GRM Focal Point / Project Manager

- **Gender Based Violence (GBV)/ Sexual Exploitation, Abuse, and Harassment (SEA/SH) Grievance Mechanism**

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The project will mainstream survivor-centred GRM to receive, manage, and resolve reports of GBV/ SEA/SH cases. This mechanism complements formal legal and judicial channels without replacing them. Below is a summary of GRM Procedures for SEA/SH grievances.

- ❖ Intake and Reception: Reports can enter through any established uptake channel (suggestion boxes, email, in-person visits, or community meetings). Complaints are accepted non-judgmentally, without questioning veracity, and with strict respect for the survivor's choice regarding how much information they wish to share.
- ❖ Strict Confidentiality and Anonymity: Maintaining survivor privacy is mandatory to safeguard dignity and physical safety. Incident reports and digital logs exclude identifying personal data, use designated case codes, and are maintained exclusively by the Gender Specialist/GRM Focal Point in secured, password-protected systems. Information is never shared without informed consent (or informed caregiver consent with child assent for minors).

Case Classification and Pathways:

- ❖ Project-Related SEA/SH: Incidents involving project, contractor, or construction supervision consultant's personnel are forwarded to the MPW Ethics and Integrity Focal Point and the employer for disciplinary proceedings under relevant codes of conduct and labor laws.
- ❖ Community GBV: Grievances not linked to project workers or project scope are recorded and immediately referred to the local GBV Sub-Cluster/Working Group for survivor assistance.
- ❖ Survivor Support and Services: With informed consent, survivors are promptly linked to a Victim/Survivor Support Officer for safety planning, risk assessment, and referrals to essential services (e.g., healthcare, psychosocial support, and shelter). Assistance is entirely voluntary and can be accessed at any time.
- ❖ Escalation and External Reporting: Project-related SEA/SH incidents are notified to the World Bank within 48 hours of intake, followed by an investigation report within 45 days in line with the ESCP. Any broader project data shared with external entities is strictly aggregated and non-identifying.

More detailed operational steps, intake forms, investigation workflows, and case management protocols for SEA/SH grievances are available in the project GRM Manual.

- **Responsibility entity for Grievance Mechanism**

Follow a two-tier GRM system, GRCs are established at the Section level and the PMU (central) level. The PMU-level GRC has a dedicated pathway for handling GBV/SEA/SH cases, led by the Gender Specialist and GRM Focal Point. It is proposed that Section-level GRCs are supported by the relevant suco councils and local authorities.

There is provision for appeal at every stage, and any aggrieved party may approach the PMU central office directly, without first raising a grievance at Section level. The formation of GRCs is completed prior to the commencement of civil works on each GRM tier.

Grievance Redress Committees (GRCs) are established as follows:
Tier 1: Section-level GRC
Each Section-level GRC comprises five members: (1) the Section/Site Engineer (Chair), (2) the Contractor's Community Liaison focal point, (3) the Construction Supervision Consultant's Social focal point, who is responsible for maintaining the grievance logbook, and (4) one male and one female community (suco) representative.

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Tier 2: PMU-level GRC
The PMU-level GRC comprises four members: the PMU Project Manager (Chair), the Social and Environmental Specialist; the Gender Specialist and Project GRM Focal Point; and a Technical Engineer at the PMU.

The PMU implements section-level and PMU-level GRCs in coordination with the Construction Supervision Consultant and local authorities. The system provides for appeals, and any aggrieved party may approach the PMU central office directly. The Gender Specialist and GRM Focal Point manage the project-specific GRCs at the PMU level.

Complainants may report complaints or feedback to any of the following committees, in order of proximity: the Section-level GRC nearest to the affected road works, or the PMU-level GRC directly.

9. Monitoring and Reporting

9.1. SEP Monitoring and Reporting

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- Progress reporting on the ESS10-Stakeholder Engagement commitments under the ESCP.
- Quantitative reporting based on the indicators included in the SEP, including but not limited to:
    - Number and location of consultation/engagement events held, with attendance disaggregated by sex and, where feasible, disability status;
    - Number of community grievances received and resolved, by category and resolution time;
    - Functionality check of information disclosure channels (notice boards current, GRM information visible) during routine construction supervision consultant's site visits; and,
    - Community feedback on the quality and accessibility of engagement, gathered at periodic liaison meetings.
- Cumulative qualitative reporting on the feedback received during SEP activities, in particular:
  (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan or SEA/SH Action Plan, if needed;
  (b) issues that have been raised and can be addressed during project implementation;
  (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and

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(d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.

Annex 3 includes an illustrative set of indicators for monitoring and reporting.

9.2. Reporting Back to Stakeholders

The SEP will be revised and updated as necessary during project implementation.

Six-monthly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions, will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders include the stakeholder consultations and disclosure of reports on the PMU website and posted at suco council and municipal offices.

This reporting back to the stakeholders will be conducted six-monthly or following stakeholder consultation.

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Annex 1. Template to capture minutes/records of consultation meetings

Consultation Attendance Record Template

Suco/Aldeia : _____
Date : _____
Facilitator(s) : _____
Topic(s) discussed : _____

Number of attendees : Men _____ Women _____ Disadvantaged groups (eg: Women Headed Households, Persons with disabilities, etc (if known)) _____

Key concerns/questions raised:

_____

Responses/follow-up actions agreed:

_____

Summary of Discussion:

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/N

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Annex 2. Budget for SEP Implementation

1. Indicative Budget

Budget categories	Unit Cost (USD)	Month / Times	Total Cost (USD)
1. Staff support, M&E and case management (including hotline operation, record keeping)	1,000.00	12	12,000.00
2. Communication materials (leaflets, posters)	50.00	12	600.00
3. Radio broadcasts/ community outreach (social media)	15,000.00	2	2,000.00
4.Hotline/ connectivity costs	200.00	12	2,400.00
5. Training (social issues, outreach, GRM, GBV/ SEA/SH case handling) for PMU, contractors, construction supervision consultants, etc.	1,500.00	4	6,000.00
6. Consultation meetings	250.00	2	500.00
7. Contingency	2,500.00	1	2,500
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:			**26,000.00**

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Annex 3. Sample of Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	• Are project-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved?	• Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villagesproject communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	Records from consultations, GRM log, respond from the implementing agency
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?	• Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties	• Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and	Stakeholder Consultation Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results

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	throughout the project cycle?	recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	
Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	• Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?	• Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.	Communication Strategy (Consultation Schedule) Periodic Focus Group Discussions Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives

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Annex 4. Grievance Manual and Submission Form

Grievance Manual

[As the GRM Manual is quite long, a link to the GRM Manual will be put here].

Grievance Reporting / Registration Form

How to use this form: This form is completed for grievance registration related to project activities. More than one category may be circled. Explain the problem as clearly as possible and attach supporting documents if available.

Complaint Code No.: _____ Location / Section: _____
Subject of the Complaint: _____ Address: _____
Complainant Details
Region: _____ District: _____
Name: _____ Phone No.: _____ Email: _____
Gender: Male ☐ Female ☐
Description of the Grievance
Grievance relates to: PMU staff ☐ TLBRP activities ☐ Contractor/Consultant ☐ Other ☐
Detailed explanation of the grievance:
_____
_____
_____
_____
_____
Grievance Category (circle all that apply)

1. Development process-related grievance (no proper mobilization, no women's participation and inclusion in planning, no proper wellbeing analysis)
2. Selection process-related grievance
3. Transport payment not provided
4. Training program-related grievance
5. GBV/SEA/SH-related grievance
6. Other

For Office Use
Record of proceedings (attach all records showing proceedings and decisions made):
_____

Suggested measures to avoid similar incidents in future:
_____

Grievance closure date: _____

Signed (GRM Focal Point): _____ Date: _____

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