

Ministry of Public Works of the Republic of Indonesia

Directorate General of Highways

STAKEHOLDER ENGAGEMENT PLAN

Trans Sumatera Toll Road – Phase I

Simpang Ness–Merlung Section (67.45 km)

Jambi Province, Indonesia

DRAFT

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August 2026

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Executive Summary

Project Overview. The Government of Indonesia (GOI), through the Ministry of Public Works (MPW) and the Directorate General of Highways (DGH), is preparing the **Trans-Sumatra Toll Road (TSTR) Phase I – Simpang Ness–Merlung Section** for financing by the Asian Infrastructure Investment Bank (AIIB) and the Islamic Development Bank (IsDB). The Project comprises approximately **67.45 km** of toll road located entirely within **Jambi Province**, traversing Muaro Jambi Regency/District, Batanghari Regency/District, and Tanjung Jabung Barat Regency/District.

The Project forms part of the broader Trans-Sumatra Toll Road network and is expected to improve regional connectivity, transport efficiency, road safety, and economic development within the Project area and across Sumatra. Project activities include land acquisition and resettlement, livelihood restoration, construction of toll road infrastructure and associated facilities, environmental and social management, and operation and maintenance of Project assets.

Recognizing the importance of transparency, participation, and effective communication throughout the Project lifecycle, this Stakeholder Engagement Plan (SEP) has been prepared to guide stakeholder engagement, information disclosure, consultation, grievance management, monitoring, and reporting activities during Project preparation, implementation, and operation.

Purpose of the Stakeholder Engagement Plan. The SEP establishes the framework for meaningful stakeholder engagement throughout the Project lifecycle. It has been prepared in accordance with applicable Indonesian laws and regulations and the requirements of the AIIB Environmental and Social Framework (ESF). The objectives of the SEP are to:

- identify stakeholders affected by or interested in the Project;
- ensure timely, transparent, and accessible disclosure of Project information;
- provide opportunities for meaningful participation and consultation;
- ensure stakeholder concerns and recommendations are considered in Project decision-making;
- support implementation of land acquisition, livelihood restoration, and environmental and social management measures;
- promote inclusion of vulnerable and disadvantaged groups;
- establish effective grievance management arrangements; and
- define the institutional arrangements, resources, monitoring measures, and reporting requirements necessary for effective stakeholder engagement.

The SEP is a living document and will be updated periodically throughout Project implementation to reflect changing Project conditions, stakeholder needs, and lessons learned.

Stakeholder Identification and Analysis. Stakeholder identification has been undertaken based on environmental and social assessments, stakeholder consultations, socio-economic surveys, land acquisition planning activities, and engagement with government agencies and local communities. Stakeholders have been grouped into three principal categories:

Project-Affected Parties. These include households affected by land acquisition, landowners and land users, farmers and plantation owners, local businesses, and communities located within the Project area of influence who may experience direct or indirect impacts from Project activities.

Other Interested Parties. These include national, provincial, district, subdistrict and village government agencies, ATR/BPN, BPJN Jambi, community and religious leaders, civil society organizations, academic institutions, media organizations, and other groups with an interest in Project implementation and outcomes.

Vulnerable and Disadvantaged Groups. Particular attention will be given to vulnerable stakeholders who may experience disproportionate Project impacts or face barriers in accessing information, consultations, compensation, livelihood restoration measures, Project benefits, or grievance mechanisms. These may include female-headed households, poor households, elderly

persons, persons with disabilities, severely affected households, landless households, and other vulnerable individuals identified during implementation.

Stakeholder Engagement Undertaken During Project Preparation. Stakeholder engagement activities have been undertaken throughout Project preparation to support environmental and social assessments, land acquisition and livelihood restoration planning, socio-economic surveys, and Project development. Engagement methods have included public consultations, focus group discussions, household interviews, socio-economic surveys, consultations with government agencies, stakeholder coordination meetings, community outreach activities, information disclosure events, and public announcements. These engagement activities were undertaken to provide Project information, identify stakeholder concerns and expectations, collect baseline information, inform environmental and social planning, support land acquisition and livelihood restoration activities, and establish a foundation for continued engagement during implementation.

Key Stakeholder Issues and Project Response. Consultations undertaken during Project preparation identified several recurring stakeholder concerns. These concerns have informed Project design, environmental and social management measures, land acquisition and livelihood restoration planning, stakeholder engagement arrangements, and grievance management procedures.

Land Acquisition, Compensation, and Livelihood Restoration. Stakeholders emphasized the importance of fair and transparent compensation, clear eligibility criteria, valuation methodologies, implementation schedules, and livelihood restoration support. In response, the Project has prepared a Land Acquisition and Resettlement Plan (LARP), including compensation procedures, livelihood restoration measures, stakeholder engagement arrangements, and grievance management procedures.

Access, Connectivity, and Community Infrastructure. Communities expressed concerns regarding potential disruption of access to residences, agricultural land, public facilities, and livelihood resources. These concerns have informed the consideration of access roads, crossings, drainage structures, community connectivity measures, and construction planning arrangements.

Environmental and Community Health and Safety Impacts. Stakeholders raised concerns regarding dust, noise, vibration, traffic safety, flooding, erosion, community disturbance, and other construction-related impacts. These concerns have informed the development of environmental and social management measures that will be implemented throughout Project construction and operation.

Employment and Local Economic Opportunities. Communities expressed interest in local employment opportunities, local procurement, and broader economic benefits associated with Project implementation. The Project will continue to communicate opportunities for local employment and participation in Project-related economic activities, where applicable.

Information Disclosure and Grievance Management. Stakeholders requested timely access to Project information, regular communication regarding implementation progress, and accessible mechanisms for raising concerns and complaints. These concerns have informed the information disclosure strategy, Stakeholder Engagement Program, and Project-level Grievance Redress Mechanism (GRM).

Stakeholder Engagement Program. Stakeholder engagement will continue throughout pre-construction, land acquisition and livelihood restoration, construction, operation, and monitoring phases. The Project will maintain ongoing consultation and communication with affected communities, government agencies, civil society organizations, and other stakeholders through public consultations, focus group discussions, household visits, coordination meetings, information disclosure activities, and community outreach programs. Special measures will be implemented to ensure meaningful participation of vulnerable and disadvantaged groups and to facilitate equitable

access to Project information, compensation and livelihood restoration measures, Project benefits, and grievance mechanisms. Information regarding Project activities, environmental and social performance, land acquisition implementation, grievance management arrangements, monitoring results, and other relevant matters will be disclosed through consultation meetings, Project Information Booklets, notice boards, information materials, and other appropriate communication channels. The Stakeholder Engagement Program will be periodically reviewed and updated in response to Project developments, stakeholder feedback, monitoring results, and lessons learned.

Grievance Redress Mechanism. The Project will establish and maintain a Project-level GRM to receive, assess, and facilitate resolution of Project-related concerns and complaints throughout the Project lifecycle. The GRM will cover grievances related to land acquisition and compensation, livelihood restoration, environmental impacts, construction activities, community health and safety, stakeholder engagement, information disclosure, labor-related concerns, contractor activities, and other Project-related issues. Stakeholders may submit grievances through multiple channels, including village offices, designated grievance focal points, Project representatives, contractors, telephone, email, written submissions, consultation meetings, and other Project communication channels. Anonymous grievances will also be accepted. The Project will implement a three-tier grievance resolution structure comprising:

- Level 1 – Local/Field Level (local government, contractors, and Community Liaison Officers);
- Level 2 – Regional/Technical Implementation Unit (TIU); and
- Level 3 – Central Level (DGH).

Special procedures will be established for handling sensitive grievances, including grievances related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and other confidential matters.

Institutional Arrangements and Resources. Overall responsibility for SEP implementation rests with DGH through the Project Management Unit and Project Implementation Unit. BPJN Jambi, ATR/BPN, local governments, contractors, supervision consultants, environmental and social specialists, and other implementing entities will support implementation of stakeholder engagement activities within their respective areas of responsibility. Adequate human, technical, and financial resources will be allocated to support stakeholder engagement, information disclosure, grievance management, monitoring, reporting, and capacity-building activities throughout the Project lifecycle.

Monitoring, Reporting and Disclosure. Implementation of the SEP will be monitored throughout the Project lifecycle to assess the effectiveness of stakeholder engagement activities, information disclosure measures, and grievance management arrangements. Monitoring activities will include tracking consultation activities, stakeholder participation, disclosure activities, grievance trends, participation of vulnerable groups, implementation of commitments, and stakeholder feedback. The results will be incorporated into Project monitoring and reporting systems and used to continuously improve stakeholder engagement performance. The SEP will be reviewed periodically and updated as necessary to reflect Project developments, stakeholder feedback, evolving environmental and social risks, and lessons learned during implementation.

AIIB Project-affected People's Mechanism. In addition to the Project-level GRM, Project-affected persons and communities who believe that they have been or are likely to be adversely affected by the Project may submit concerns to the AIIB through its Project-affected People's Mechanism (PPM). The PPM is an independent accountability mechanism that provides a process through which Project-affected people may raise concerns regarding AIIB's compliance with its ESF and Environmental and Social Standards. The PPM operates independently from the Project-level GRM and does not replace available Project-level, administrative, or judicial remedies. Information regarding both the Project-level GRM and the PPM will be disclosed through stakeholder engagement activities and Project information materials.

1. Introduction

The Government of Indonesia (GOI) is planning the development of the Jambi–Rengat section of the Trans-Sumatra Toll Road (TSTR). During earlier stages of project planning, studies, stakeholder engagement activities, and environmental and social assessments were undertaken for the broader Jambi–Rengat corridor extending across Jambi and Riau Provinces. The Project currently under preparation for financing by Asian Infrastructure Investment Bank (AIIB) and Islamic Development Bank (IsDB) comprises the Phase I (Simpang Ness–Merlung) section located within Jambi Province and traversing Muaro Jambi Regency/District, Batanghari Regency/District, and Tanjung Jabung Barat Regency/District. References to stakeholder engagement activities undertaken outside the current Project footprint are retained in this Stakeholder Engagement Plan (SEP), where relevant, to provide a complete record of stakeholder engagement conducted during project preparation and evolution.

The main goal of this investment project is to create road infrastructure that improves regional connectivity and supports economic development through safe, efficient, and reliable transportation services. Recognizing the need to ensure the environmental and social sustainability of the Project, several environmental and social assessments have been undertaken to comply with applicable Indonesian laws and regulations, as well as the Environmental and Social Framework (ESF) of the AIIB. The assessments have resulted in the preparation of a range of environmental and social instruments, including the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Land Acquisition and Resettlement Plan (LARP), Biodiversity Management Plan (BMP), Gender Action Plan (GAP), and this SEP.

The SEP establishes the framework for stakeholder engagement and information disclosure throughout the Project lifecycle and seeks to ensure: (i) meaningful, inclusive, and culturally appropriate stakeholder engagement; (ii) effective integration of stakeholder views into project planning, design, implementation, and monitoring; and (iii) enhanced environmental and social sustainability of Project outcomes. For the purposes of this SEP, a stakeholder is any individual, group, community, organization, or institution that may influence, be affected by, or have an interest in the Project and its environmental and social outcomes.

1.1. Purpose of this Document

The GOI recognizes that there are many stakeholders, both institutional and individual, with interests in the road sector generally and in this Project specifically. Stakeholders are heterogeneous, and their interests, expectations, concerns, influence, and capacity to engage with the Project vary considerably. Such a diversified group of stakeholders necessitates systematic efforts to develop a SEP to identify different stakeholder groups and sub-groups, design appropriate engagement approaches, undertake meaningful consultations, and ensure timely disclosure of Project information.

This document serves as a framework for managing stakeholder engagement throughout the Project lifecycle. The SEP is intended to support the Project in building and maintaining constructive relationships with stakeholders, promoting transparency, identifying and addressing concerns in a timely manner, minimizing environmental and social risks, and supporting successful Project implementation. This document is a living document and will be reviewed and updated periodically to reflect changes in Project design, implementation arrangements, stakeholder concerns, consultation outcomes, and other relevant developments throughout Project implementation.

The Stakeholder Engagement Plan provides a structured process through which stakeholders can access information, express their views, provide feedback, raise concerns, and participate in Project planning, implementation, monitoring, and evaluation activities. Meaningful stakeholder engagement helps ensure that Project decisions are informed by local knowledge and stakeholder perspectives, thereby contributing to more inclusive, responsive, and sustainable Project outcomes. Thus, stakeholder engagement is not only a governance and accountability requirement, but also an

important risk management and Project management tool to improve Project quality and create a wider positive impact on society.

Given the evolution of the Project scope during preparation, this SEP includes records of stakeholder engagement activities undertaken during earlier planning stages, including consultations conducted outside the current Project footprint. Such consultations are retained to provide a complete record of stakeholder engagement and to demonstrate how stakeholder feedback informed Project planning and decision-making. Unless otherwise specified, stakeholder engagement activities planned under this SEP relate to the current AIIB-IsDB financed Project area.

1.2. Objectives of Engagement

The specific objectives of the Stakeholder Engagement Plan are to:

- Establish a systematic approach for identifying stakeholders and building and maintaining constructive relationships with them, particularly project-affected persons and communities, thereby promoting trust, transparency, and long-term sustainability of Project outcomes.
- Assess stakeholder interests, concerns, expectations, and levels of support for the Project and ensure that stakeholder views are appropriately considered in Project planning, design, implementation, and environmental and social performance management.
- Identify and manage environmental and social risks at an early stage, including potential land acquisition and resettlement issues, community concerns, cultural sensitivities, labor-related issues, grievance trends, and other Project-related risks before they escalate.
- Promote meaningful, inclusive, and culturally appropriate engagement with project-affected parties and other stakeholders throughout the Project lifecycle, including ensuring the participation of vulnerable and disadvantaged groups, women, elderly persons, persons with disabilities, and other groups that may face barriers to participation.
- Ensure that relevant information regarding the Project, including its environmental and social risks, impacts, mitigation measures, and implementation arrangements, is disclosed to stakeholders in a timely, understandable, accessible, and culturally appropriate manner.
- Provide Project-affected persons and other stakeholders with accessible, transparent, inclusive, and responsive mechanisms to raise concerns, submit grievances, and obtain timely resolution of issues.
- Define institutional arrangements, roles, responsibilities, and resources for the effective implementation of stakeholder engagement and information disclosure activities.
- Establish monitoring, reporting, and review mechanisms to assess the effectiveness of stakeholder engagement activities and periodically update the SEP as necessary throughout Project implementation.

1.3. Structure of the Document

The SEP provides a framework for stakeholder identification, information disclosure, consultation, participation, grievance management, monitoring, and reporting throughout the Project lifecycle. It also outlines the institutional arrangements, resources, and stakeholder engagement activities that will be implemented during Project preparation, land acquisition, construction, operation, and monitoring phases. The Stakeholder Engagement Program included in this SEP may be periodically updated to reflect evolving Project circumstances, stakeholder needs, and implementation priorities. The SEP is structured as follows:

- **Chapter 1 – Introduction:** Presents the background, objectives, scope, and purpose of the SEP, and outlines the approach to stakeholder engagement for the Project.
- **Chapter 2 – Project Description:** Provides an overview of the Project, including its location, components, implementation schedule, and area of influence.
- **Chapter 3 – Policy and Regulatory Framework:** Summarizes the applicable national legal framework and AIIB Environmental and Social Framework requirements relevant to stakeholder engagement, information disclosure, and grievance management.

- **Chapter 4 – Summary of Previous Stakeholder Engagement Activities:** Describes stakeholder engagement activities undertaken during Project preparation, key issues raised by stakeholders, and how stakeholder feedback has informed Project planning and design.
- **Chapter 5 – Stakeholder Identification and Analysis:** Identifies Project stakeholders, analyzes their interests and influence, and summarizes key stakeholder issues, concerns, and engagement requirements.
- **Chapter 6 – Stakeholder Engagement Program:** Sets out the Project's stakeholder engagement strategy, information disclosure commitments, consultation approaches, and planned engagement activities throughout the Project lifecycle.
- **Chapter 7 – Roles, Responsibilities and Resources for Stakeholder Engagement:** Defines institutional arrangements, implementation responsibilities, resource requirements, budget allocations, and capacity needs for SEP implementation.
- **Chapter 8 – Grievance Redress Mechanism:** Describes the Project-level grievance mechanism, including procedures for receiving, addressing, and monitoring stakeholder complaints and concerns.
- **Chapter 9 – Monitoring, Disclosure and Reporting:** Describes the arrangements for monitoring SEP implementation, reporting stakeholder engagement outcomes, disclosing relevant information, and periodically updating the SEP.
- **Appendices:** Include detailed consultation records, stakeholder engagement templates and reference materials, sample stakeholder engagement strategies, grievance forms, and other supporting documentation.

2. Project Description

2.1. Project Rationale

Roads, as integral components of the national transportation system, play a crucial role in supporting various sectors, including economic, social, cultural, environmental, and security. The development of road infrastructure follows a regional approach aimed at achieving balanced and equitable development across regions, fostering national unity, supporting national defense and security objectives, and establishing a spatial structure to meet national development goals, in accordance with the applicable legal framework of Indonesia.

Presidential Regulation Number 100/2014 concerning the Acceleration of Toll Road Development in Sumatra designated PT Hutama Karya (Persero) to undertake the development of selected toll road sections in Sumatra. Subsequently, Presidential Regulation Number 117/2015 expanded PT Hutama Karya's assignment to a broader network of toll roads across Sumatra. The Jambi–Rengat Toll Road forms part of the broader TSTR network, a strategic national infrastructure initiative intended to improve connectivity, logistics efficiency, mobility, economic development, and regional integration across Sumatra.

The Project currently under preparation for financing by AIIB and IsDB comprises the Phase I (Simpang Ness–Merlung) section of the Jambi–Rengat Toll Road, with a total length of approximately 67.45 km. The Project is part of the broader Trans-Sumatra Toll Road network and is intended to contribute to improved connectivity, safety, and resilience of the road transport network in Sumatra.

The purpose of constructing the Jambi–Rengat Toll Road is to enhance transportation infrastructure and improve connectivity between economic centers, logistics corridors, and communities within Jambi Province and across Sumatra. The Project is also intended to support the Government of Indonesia's infrastructure development agenda, including the expansion of strategic toll road networks and improved regional accessibility.

The objectives of constructing the Jambi–Rengat Toll Road are as follows:

- To establish an efficient transportation system that supports regional economic growth and contributes to broader national development. Existing road corridors experience increasing traffic demand, and the Project will provide additional capacity and improved connectivity between key economic centers and transport corridors.
- To promote economic growth by improving logistics efficiency, reducing travel times and transportation costs, facilitating movement of goods and people, and strengthening connectivity between production centers, markets, and service hubs.
- To develop a toll road meeting applicable national road design standards and capable of supporting safe, reliable, and efficient movement of passengers, goods, and services, thereby contributing to improved mobility, economic competitiveness, and community welfare.

2.2. Project Location and Setting

The location of the Jambi–Rengat Toll Road alignment is part of the TSTR network. The Project currently under preparation for financing by AIIB and IsDB comprises the Phase I (Simpang Ness–Merlung) section, with a total length of approximately 67.45 km, located entirely within Jambi Province and traversing Muaro Jambi District, Batanghari District, and Tanjung Jabung Barat District. Earlier planning studies and stakeholder engagement activities covered the broader Jambi–Rengat corridor, including sections in Riau Province; however, those areas are outside the scope of the current Project.

Jambi Province

The Project is located within Jambi Province and traverses three regencies, namely Muaro Jambi District, Batanghari District, and Tanjung Jabung Barat District. The Project alignment extends from Simpang Ness in Muaro Jambi District to Merlung in Tanjung Jabung Barat District and forms part of the broader Jambi–Rengat Toll Road corridor. The Project area includes a number of villages and communities

located within the Project footprint and area of influence. The principal administrative areas traversed by the Project are summarized below.

District Muaro Jambi

The Project alignment traverses Jambi Luar Kota and Sekernan Subdistricts, including Danau Sarang Elang Village, Pijoan Village, Pematang Jering Village, Tantang Village, Rantau Majo Village, Gerunggung Village, Bukit Baling Village, and Suko Awin Jaya Village.

District Batanghari

The Project alignment traverses Pemayung Subdistrict, including Selat Village.

District Tanjung Jabung Barat

The Project alignment traverses Muara Papalik, Tungkal Ulu, Tebing Tinggi, and Batang Asam Subdistricts, including Mundo Hamlet, Kuala Dasal Village, Pelabuhan Dagang Village, Brasau Village, Taman Raja Village, Tebing Tinggi Village, and Suban Village.

As a "mega project" in the Indonesian Government's Medium-Term Development Plan, the TSTR is intended to improve regional connectivity, logistics efficiency, and economic integration across Sumatra by linking major economic centers, industrial areas, and logistics corridors.

The current AIIB-IsDB financed Project comprises the Phase I (Simpang Ness–Merlung) section of the Jambi–Rengat Toll Road, with an approximate length of 67.45 km located in Jambi Province. Earlier project planning, environmental and social studies, and stakeholder engagement activities covered the broader Jambi–Rengat corridor, including sections in Riau Province. References to those activities are retained in this SEP where relevant to provide context and a complete record of project preparation; however, Riau Province is outside the footprint of the current Project.

2.3. Project components

The Project comprises the development of the Phase I (Simpang Ness–Merlung) section of the Jambi–Rengat Toll Road, with an approximate length of 67.45 km located in Jambi Province. The Project traverses Muaro Jambi District, Batanghari District, and Tanjung Jabung Barat District and forms part of the broader Trans-Sumatra Toll Road network.

As with other major transport infrastructure projects, Project activities may result in environmental and social impacts during pre-construction, construction, and operation phases. These may include land acquisition and resettlement impacts, temporary disturbances associated with construction activities, impacts on access and livelihoods, traffic and community health and safety risks, and other environmental and social impacts assessed through the Project's environmental and social instruments.

The Project consists of activities associated with land acquisition and resettlement, detailed design refinement, construction of toll road infrastructure and associated facilities, operation and maintenance of the toll road, implementation of environmental and social management measures, and stakeholder engagement activities.

2.4. Schedule & Timeframe

Government of Indonesia, through Presidential Regulation and subsequent government decisions, assigns the Ministry of Public Works (MPW) to lead the preparation and implementation of the Project, including mobilization of financing support from international financing institutions. The Government also assigns PT Hutama Karya (Persero) (PT HK) to support toll road development and future operation and maintenance arrangements, under the oversight of the Ministry of Public Works, including the Directorate General of Highways (DGH).

An initial Detailed Engineering Design (DED) was approved by DGH in 2023 and subsequently updated in 2025 to incorporate technical enhancements. Review of certain sections of the DED remains ongoing and is expected to be completed prior to implementation.

Land acquisition activities have commenced; however, additional land acquisition, compensation, livelihood restoration, and corrective actions remain to be completed in accordance with the approved LARP and applicable requirements.

The Project is currently under appraisal by AIIB and IsDB. Subject to fulfilment of Government readiness requirements, completion of environmental and social documentation, public disclosure, land acquisition progress, financing approvals, effectiveness of the financing agreements, and completion of procurement processes, construction of the Simpang Ness–Merlung section is expected to commence following financial close. The Project implementation schedule will be updated periodically as Project preparation progresses.

2.5. Project Area of Influence

The Project Area of Influence (Aoi) has been defined based on the nature and extent of the Project's anticipated environmental and social impacts and includes both the Project footprint and areas that may be directly, indirectly, or cumulatively affected by Project activities. The Aoi includes:

- a) The Project footprint, including the Simpang Ness–Merlung Toll Road alignment, interchanges, toll gates and offices, rest and service areas, drainage structures, bridges, underpasses, overpasses, and other associated permanent facilities.
- b) Ancillary and associated facilities supporting Project implementation, including access roads, contractor camps, worker accommodation, quarries, batching plants, jetties, material storage areas, and other facilities used during construction.
- c) Adjacent communities and settlements that may experience direct or indirect impacts associated with land acquisition, construction activities, traffic movement, noise, dust, temporary access restrictions, community health and safety risks, or other Project-related disturbances.
- d) Villages and households affected by land acquisition and resettlement activities, including affected persons experiencing loss of land, structures, crops, trees, livelihood sources, or access to assets and resources.
- e) Areas containing environmental and social resources that may be affected by the Project, including watersheds, airsheds, riparian zones, livelihood areas, and ecologically sensitive habitats that support biodiversity and ecosystem services.
- f) Areas where stakeholder engagement, information disclosure, grievance redress, livelihood restoration, and other environmental and social management measures are implemented as part of Project preparation and implementation.

3. POLICY AND REGULATORY FRAMEWORK

3.1. National Framework

The preparation and implementation of this SEP are guided by the applicable legal and regulatory framework of Indonesia relating to public participation, stakeholder engagement, access to information, environmental and social assessment, land acquisition, and grievance resolution. The principal laws and regulations relevant to stakeholder engagement, information disclosure, consultation, and public participation are summarized in table below. These national requirements are complemented by the stakeholder engagement and information disclosure requirements of the AIB, as discussed in Section 3.2.

Table 1. Legal and Regulatory Policies on Community Participation, Engagement, and Transparency in Development Implementation in Indonesia

Regulation Title	Key Provisions
Law Number 23/2014 concerning Regional Government	Requires regional governments to encourage public participation in planning, budgeting, implementation, monitoring, and evaluation of development activities. Community participation may be undertaken through public consultations, deliberations, partnerships, expression of aspirations, community oversight, and other forms of stakeholder involvement in accordance with applicable legislation (Article 354).
Law Number 32/2009 concerning Environmental Protection and Management	Requires public participation in the preparation of Environmental Impact Assessments (AMDAL). Community engagement shall be undertaken through the provision of transparent, comprehensive, and timely information prior to project implementation. Consultation participants include affected communities, environmental observers, and other stakeholders affected by decisions arising from the AMDAL process (Article 26).
Law Number 25/2004 concerning the National Development Planning System	Establishes a participatory national development planning framework based on the principles of democracy, equity, sustainability, and environmental responsibility. The law promotes community participation in development planning processes to ensure that public interests and stakeholder perspectives are considered in decision-making (Article 2).
Law Number 2/2012 concerning Land Acquisition for Development for Public Interest.	Establishes the principles of openness, participation, fairness, and consultation in land acquisition for development in the public interest. The law requires stakeholder engagement throughout the land acquisition process, including notification of development plans, identification of affected areas, and public consultations. It also provides a framework for compensation, objection handling, and engagement with affected persons during land acquisition and resettlement activities (Articles 2 and 16).
Law No. 6/2023 on the Stipulation of Government Regulation in Lieu of Law No. 2/2022 on Job Creation as Law:	Introduces reforms to streamline licensing, permitting, and land acquisition processes for development projects, including those undertaken for the public interest. The law includes provisions affecting land acquisition procedures, compensation arrangements, and approval processes, with the objective of facilitating project implementation while maintaining applicable legal safeguards for affected persons.
Government Regulation 19/2021 and its amendment (Government Regulation 39/2023) on the Implementation of Land Acquisition for Development for Public Interest	Provides detailed procedures for implementing land acquisition for development in the public interest, including planning, consultation, inventory and identification of affected assets, valuation, compensation, grievance handling, and relinquishment of land rights. The regulation requires involvement of ATR/BPN throughout the land acquisition process and emphasizes the provision of fair and appropriate compensation based on independent appraisal. The amendments further clarify special land acquisition procedures, strengthen compensation valuation arrangements, and allow compensation assessments to be undertaken by qualified government appraisers in addition to independent public appraisers.
Ministry of Agraria and Spatial Planning (MASP)/National Land Agency (BPN) 19/2021 on Provisions for the	Provides detailed procedures for the implementation of land acquisition for development in the public interest, including planning, stakeholder consultations, inventory and identification of affected assets, valuation, compensation, grievance handling, relocation, and transfer of land rights. The

Regulation Title	Key Provisions
Implementation of Land Acquisition for Development in the Public Interest	regulation clarifies the roles and responsibilities of ATR/BPN and related institutions throughout the land acquisition process.
Presidential Regulation of the Republic of Indonesia Number 3/2016 on the Acceleration of the Implementation of National Strategic Projects	Requires complaints and concerns from the public regarding National Strategic Projects to be addressed through established administrative mechanisms. The regulation emphasizes timely follow-up and resolution of community complaints and supports the establishment of effective grievance management and stakeholder communication processes (Article 31).
Law Number 14 of 2008 concerning Public Information Disclosure	Recognizes access to public information as a fundamental right and promotes transparency, accountability, and good governance. The law requires public bodies to provide access to public information and establishes the principles and procedures for disclosure of information relevant to the public interest. It provides an important legal basis for information disclosure, transparency, and public access to Project-related information (Article 1).

3.2. AIIB Environment and Social Framework

The Project is being prepared for financing by the AIIB and is therefore required to comply with the AIIB ESF, including applicable Environmental and Social Standards (ESSs). The ESF seeks to ensure that projects financed by AIIB are environmentally and socially sustainable and that environmental and social risks and impacts are identified, assessed, and managed throughout the Project lifecycle. The requirements contained in this SEP are informed primarily by the stakeholder engagement, information disclosure, inclusion, land acquisition, and grievance management provisions of the AIIB ESF.

Social Development and Inclusion. AIIB promotes inclusive development by ensuring that all people, including disadvantaged and vulnerable groups, have opportunities to participate in and benefit from Project activities. The ESF requires the identification of individuals and groups who may be disproportionately affected by Project impacts or who may face barriers in accessing Project information, consultations, benefits, compensation, livelihood restoration measures, or grievance mechanisms. Appropriate measures should be implemented to ensure their effective participation and equitable access to Project benefits.

Stakeholder Engagement and Information Disclosure. AIIB recognizes stakeholder engagement as an integral component of effective project preparation and implementation. Meaningful stakeholder engagement should begin as early as possible and continue throughout the Project lifecycle. Stakeholder engagement should be conducted in a transparent, timely, inclusive, and culturally appropriate manner and should provide stakeholders with accessible information regarding Project activities, potential impacts, mitigation measures, and opportunities for participation in decision-making processes.

Meaningful engagement requires that stakeholders are provided with relevant information in a form and language they can understand and that their views, concerns, and recommendations are considered during Project planning and implementation. The scope and level of engagement should be proportionate to the nature, scale, risks, and impacts of the Project.

AIIB also recognizes that Project stakeholders may face risks of intimidation, coercion, retaliation, discrimination, or other adverse treatment as a result of participating in stakeholder engagement activities. Where such risks are identified, appropriate measures should be adopted to avoid or minimize them and to ensure that stakeholders can participate safely and freely in Project-related consultations and grievance mechanisms.

Poor and Vulnerable Groups. The AIIB ESF requires borrowers to identify vulnerable and disadvantaged individuals and groups who may be disproportionately affected by Project impacts or who may have limited ability to participate in consultation processes or access Project benefits. Such

groups may include low-income households, women-headed households, elderly persons, persons with disabilities, landless persons, and other socially or economically disadvantaged populations.

Specific engagement measures, targeted communication approaches, and where necessary additional assistance should be provided to ensure that vulnerable persons are able to participate meaningfully in stakeholder engagement activities and access Project compensation, livelihood restoration, benefit-sharing, and Grievance Redress Mechanism (GRM) on an equitable basis.

Indigenous Peoples. Where Indigenous Peoples are present in, or have collective attachment to, the Project area, AIIB ESS 3 requires the assessment of Project-related impacts and implementation of culturally appropriate measures to avoid, minimize, mitigate, or compensate adverse impacts and enhance Project benefits. Depending on the nature of impacts, the borrower may be required to prepare an Indigenous Peoples Plan (IPP) or Indigenous Peoples Planning Framework (IPPF). No Indigenous Peoples have currently been identified within the Project footprint. However, the Project will continue to assess this issue during implementation and will apply the relevant requirements of AIIB ESS 3 should Indigenous Peoples be identified during the course of Project implementation.

Grievance Redress Mechanism. AIIB requires the establishment of a project-level GRM to receive, assess, and facilitate resolution of Project-related concerns and complaints. The GRM should be scaled to the risks and impacts of the Project and should be accessible, transparent, culturally appropriate, inclusive, and free of charge. The GRM should allow affected persons and other stakeholders to submit complaints through multiple channels, including anonymous submissions where requested. The mechanism should provide timely acknowledgement, assessment, and resolution of grievances and include measures to protect complainants from retaliation, intimidation, coercion, discrimination, or other adverse consequences resulting from the submission of complaints. Where appropriate, project-level grievance mechanisms may build upon existing formal or informal grievance systems, provided such mechanisms are effective and consistent with AIIB requirements. The Project shall maintain records of grievances received, actions taken, and resolution outcomes, and shall periodically report on GRM performance as part of Project monitoring and reporting. This SEP has been prepared in accordance with applicable Indonesian laws and regulations and the requirements of the AIIB ESF. The stakeholder engagement, information disclosure, consultation, inclusion, and grievance management measures described in this SEP are intended to satisfy both national regulatory requirements and applicable AIIB Environmental and Social Standards.

4. Summary of Previous Stakeholder Engagement Activities

4.1. Overview of Stakeholders Engagement Undertaken

The Project has undertaken a range of stakeholder engagement activities during project preparation, environmental and social assessment, and land acquisition planning. These activities were conducted between 2020 and 2023 in support of the preparation of the AMDAL, land acquisition planning, socio-economic surveys, Community Engagement, Gender Action Plan, Indigenous Peoples-related assessments, and other environmental and social due diligence activities. The objectives of stakeholder engagement activities were to:

- provide stakeholders with information regarding the Project and its anticipated environmental and social impacts;
- identify stakeholder concerns, expectations, and recommendations;
- collect baseline information regarding social conditions, land ownership, livelihoods, and vulnerability;
- support preparation of environmental and social assessment documents and land acquisition planning instruments;
- facilitate communication between project authorities and affected communities; and
- establish a foundation for continued stakeholder engagement during project implementation.

Stakeholder engagement activities were undertaken through a combination of public consultations, focus group discussions (FGDs), mass media announcements, and household-level socio-economic surveys and interviews. These activities sought to inform stakeholders about the Project, identify concerns and expectations, collect baseline information, and obtain stakeholder feedback to support project planning and environmental and social management.

Earlier stakeholder engagement activities covered the broader Jambi–Rengat corridor extending into both Jambi and Riau Provinces. Following refinement of project scope, the current AIIB-IsDB financed Project is limited to the Simpang Ness–Merlung section located within Jambi Province. Nevertheless, records of consultations undertaken during earlier project planning stages have been retained as part of the Project's consultation history and provide important context regarding stakeholder concerns that informed project development.

The detailed record of stakeholder engagement activities undertaken during project preparation is provided in Appendix A.

4.2. Stakeholder Engagement Methods

A variety of stakeholder engagement methods were applied during project preparation to ensure broad stakeholder outreach and obtain feedback from affected and interested parties. These methods included:

- **Public consultations** with government agencies, village authorities, affected communities, and other stakeholders during AMDAL preparation and early project planning;
- **FGDs** with affected communities, village representatives, and vulnerable stakeholders to discuss land acquisition, compensation, livelihood restoration, and project impacts;
- **Mass media announcements** to disclose project information and notify stakeholders of AMDAL preparation activities;
- **Household socio-economic surveys and interviews** to collect baseline information on affected households, livelihoods, land ownership, asset losses, and perceptions regarding the Project; and
- **Informal consultations and coordination meetings** with relevant government agencies and local authorities throughout project preparation.

Engagement methods were tailored to the purpose of consultation and the stakeholder groups involved.

4.3. Summary of Stakeholders Consulted

The consultation process engaged stakeholders representing both project-affected parties and interested parties.

Project-Affected Parties

Project-affected stakeholders included:

- landowners and land users affected by land acquisition;
- households experiencing loss of land, crops, trees, structures, or livelihood assets;
- communities located adjacent to the proposed toll road corridor;
- farmers and plantation owners;
- local businesses and economic actors potentially affected by project activities;
- vulnerable and disadvantaged households; and
- communities potentially affected by construction-related impacts such as noise, dust, traffic disruption, and temporary access restrictions.

Interested Parties

Interested parties consulted during project preparation included:

- Ministry of Public Works and affiliated agencies;
- ATR/BPN and land acquisition authorities;
- provincial, district, subdistrict, and village governments;
- environmental authorities;
- community leaders and religious leaders;
- women's groups and community organizations;
- NGOs and civil society organizations; and
- private sector stakeholders operating within or near the project area.

Consultation activities also involved stakeholders located in sections of the broader corridor that were considered during earlier project planning stages. Although some of these areas are outside the scope of the current Project, consultation outcomes remain useful for understanding community expectations, recurring concerns, and stakeholder perceptions regarding toll road development within the wider corridor.

4.4. Key Issues and Concerns Raised by Stakeholders

Consultations undertaken during project preparation identified several recurring stakeholder concerns and expectations. While the specific issues varied among locations and stakeholder groups, the principal themes raised are summarized below.

Land Acquisition and Compensation

The most frequently raised concern related to land acquisition, valuation of affected assets, compensation eligibility, compensation amounts, treatment of different land tenure arrangements, compensation payment schedules, and transparency of compensation processes. Stakeholders emphasized the need for clear information regarding compensation entitlements, land acquisition procedures, and grievance resolution mechanisms.

Livelihood Impacts and Restoration

Stakeholders expressed concerns regarding potential loss of agricultural land, productive oil palm plantations, and other livelihood sources. Many stakeholders emphasized the importance of livelihood restoration measures, employment opportunities, and support for affected households following land acquisition.

Access and Community Connectivity

Communities raised concerns regarding maintenance of access to farms, residences, markets, rivers, and community facilities during both construction and operation of the toll road. Stakeholders highlighted the importance of adequate overpasses, underpasses, crossing facilities, and access roads.

Flooding and Drainage

Stakeholders expressed concerns regarding potential changes to drainage patterns, river flows, and flooding risks resulting from project construction activities. Particular attention was requested for flood-prone areas and watercourses crossed by the Project.

Employment and Local Economic Opportunities

Communities expressed expectations regarding local employment opportunities during construction and operation, participation of local businesses and SMEs, and potential opportunities associated with rest areas and supporting facilities.

Environmental and Social Impacts

Stakeholders raised concerns regarding erosion, dust, traffic safety, noise, environmental disturbance, and impacts on surrounding communities. Requests were also made for effective environmental management and mitigation measures during construction.

Cultural Heritage and Community Resources

In certain locations outside the current Project footprint, concerns were raised regarding customary land issues and culturally important sites. Stakeholders emphasized the need to respect local cultural values and community resources during project implementation.

4.5. How Stakeholder Feedback Has Been Addressed

Stakeholder inputs gathered during project preparation have informed the development of project design, environmental and social assessments, land acquisition planning, and stakeholder engagement arrangements. Key responses to stakeholder feedback include:

- preparation of a LARP and Livelihood Restoration Program (LRP) to address land acquisition and livelihood impacts;
- incorporation of stakeholder engagement and information disclosure measures into this SEP;
- establishment of a project-level GRM;
- consideration of access, drainage, community connectivity, and environmental mitigation measures during project design development;
- inclusion of measures to support engagement with vulnerable groups and affected households; and
- incorporation of stakeholder concerns into environmental and social management and monitoring programs.

Stakeholder engagement will continue throughout Project implementation to provide updated information, obtain stakeholder feedback, and monitor the effectiveness of mitigation measures.

4.6. Key Lessons for Future Stakeholder Engagement

Previous stakeholder engagement activities highlighted several important lessons that will inform implementation of this SEP.

First, stakeholders consistently emphasized the need for timely, accurate, and transparent information regarding land acquisition, compensation processes, implementation schedules, and project progress.

Second, stakeholders expressed the need for continued engagement throughout project implementation rather than one-time consultation events. Regular communication and feedback mechanisms will therefore be maintained throughout the Project lifecycle.

Third, consultations demonstrated the importance of involving local governments, village leaders, and community representatives in engagement activities to facilitate information dissemination and strengthen stakeholder trust.

Finally, consultations identified the need for accessible grievance mechanisms and targeted engagement approaches for vulnerable stakeholders and households directly affected by land acquisition and livelihood impacts.

These lessons have informed the stakeholder engagement strategies and consultation approaches presented in the subsequent chapters of this SEP.

5. Stakeholder Identification and Analysis

Effective stakeholder engagement requires a clear understanding of individuals, groups, communities, and institutions that may affect, be affected by, or have an interest in the Project. Stakeholder identification and analysis provide the foundation for designing engagement activities that are proportionate to stakeholder interests, potential Project impacts, and levels of influence. Building on the findings of previous stakeholder engagement activities summarized in Chapter 4, this chapter identifies key stakeholder groups, analyses their interests and concerns, assesses their level of influence and potential exposure to Project impacts, and establishes the basis for the stakeholder engagement strategies presented in Chapter 6.

5.1. Stakeholder Identification

Stakeholder identification has been undertaken based on information collected through environmental and social assessments, stakeholder engagement activities, socio-economic surveys, land acquisition planning activities, project design studies, and consultations conducted during project preparation. The process has also been informed by secondary data sources, institutional consultations, and feedback received from affected communities and government agencies.

For the purposes of this SEP, stakeholders include individuals, groups, communities, organizations, and institutions that may be affected by the Project, influence Project outcomes, or have an interest in the Project and its environmental and social performance. Stakeholders may experience different levels of Project impacts, interests, influence, and engagement needs.

Consistent with AIB requirements and international good practice, stakeholders have been categorized into three broad groups:

- **Project-Affected Parties (PAPs):** individuals, households, communities, and organizations that may be directly or indirectly affected by Project activities, including land acquisition, construction activities, livelihood impacts, temporary access restrictions, or other environmental and social impacts;
- **Other Interested Parties (OIPs):** individuals, groups, institutions, and organizations that have an interest in the Project but are not necessarily directly affected by Project impacts; and
- **Vulnerable and Disadvantaged Groups:** individuals or groups who may be disproportionately affected by Project impacts or may face barriers in accessing Project information, participating in consultations, accessing Project benefits, or utilizing grievance mechanisms.

The stakeholder identification process provides the basis for designing engagement approaches that are proportionate to stakeholder interests, potential impacts, and levels of influence throughout the Project lifecycle.

5.2. Stakeholder Categorization

Stakeholders have been categorized according to their relationship with the Project and the nature of their potential interests or impacts. This categorization supports the development of targeted engagement strategies and helps ensure that consultation methods, information disclosure approaches, and grievance management arrangements are appropriate to the needs of different stakeholder groups. The Project recognizes three principal stakeholder categories:

- Project-Affected Parties;
- Other Interested Parties; and
- Vulnerable and Disadvantaged Groups.

The stakeholder groups identified under each category are described in the following sections. Stakeholder identification and analysis will be reviewed periodically and updated as necessary to reflect changes in Project design, implementation arrangements, stakeholder interests, and emerging issues.

5.2.1. Project-Affected Parties

Project-Affected Parties are stakeholders who may experience direct or indirect environmental, social, economic, or livelihood impacts as a result of Project activities. This category includes persons affected by land acquisition and resettlement, communities located within the Project area of influence, users of affected infrastructure or services, and other individuals whose livelihoods, assets, access, or living conditions may be affected by the Project. For the current Project, Project-Affected Parties include:

- Households affected by land acquisition;
- Owners and users of affected agricultural land, plantations, and other productive assets;
- Households experiencing impacts on structures, crops, trees, or other assets;
- Communities located adjacent to the Project corridor;
- Local businesses and economic actors affected by Project activities;
- Road users and communities affected by traffic diversions or construction activities; and
- Households affected by temporary construction impacts such as noise, dust, vibration, access restrictions, or community health and safety risks.

5.2.2. Other Interested Parties

Other Interested Parties are stakeholders who may not be directly affected by Project impacts but who have an interest in Project planning, implementation, governance, environmental and social performance, or development outcomes. These stakeholders include government agencies, regulatory authorities, local governments, community organizations, civil society groups, and other institutions that have responsibilities, interests, or influence related to the Project.

Key Other Interested Parties include:

- MPW and DGH;
- PMU and PIU;
- BPJN Jambi;
- ATR/BPN and Land Acquisition Implementation Team (LAIT);
- Provincial, regency/district, subdistrict, and village governments;
- Environmental authorities and regulatory agencies;
- Community leaders and religious leaders;
- Civil society organizations (CSOs) and non-governmental organizations (NGOs);
- Academic and research institutions, where relevant; and
- Media organizations involved in public information dissemination.

5.2.3. Vulnerable and Disadvantaged Groups

The Project recognizes that certain individuals and groups may be more vulnerable to adverse Project impacts or may face barriers to participation in stakeholder engagement processes. Such stakeholders may require additional support and targeted engagement measures to ensure equitable access to Project information, consultations, livelihood restoration measures, compensation processes, Project benefits, and grievance mechanisms.

Based on available Project information and social assessments, vulnerable and disadvantaged groups may include:

- Female-headed households;
- Poor and low-income households;
- Elderly persons living alone or with limited support networks;
- Persons with disabilities;
- Severely affected households experiencing significant loss of land or livelihoods;
- Landless persons and economically vulnerable households;
- Households with limited literacy or limited access to Project information; and
- Other vulnerable persons identified during Project implementation.

Specific measures for engagement with vulnerable groups are described in the Stakeholder Engagement Program and will be further refined as Project implementation progresses.

5.3. Stakeholder Analysis

Stakeholder analysis was undertaken to better understand the interests, concerns, influence, and potential exposure of different stakeholder groups to Project risks and impacts. The analysis provides the basis for determining appropriate engagement approaches, consultation methods, information disclosure requirements, and grievance management arrangements throughout the Project lifecycle.

The stakeholder analysis draws upon information obtained through previous stakeholder engagement activities, environmental and social assessments, socio-economic surveys, land acquisition planning activities, institutional consultations, and ongoing discussions with affected communities and government agencies. For each stakeholder group, the analysis considered the following factors:

- **Potential Project impacts**, including the extent to which the stakeholder may be positively or negatively affected by land acquisition, livelihood impacts, construction activities, environmental impacts, or operational activities;
- **Level of interest**, reflecting the degree to which a stakeholder is concerned about, affected by, or interested in Project outcomes and decisions;
- **Level of influence**, reflecting the stakeholder's ability to influence Project decisions, implementation outcomes, permitting processes, community perceptions, or stakeholder acceptance of the Project;
- **Information and engagement needs**, including the type of information required and the most appropriate consultation and communication methods; and
- **Vulnerability considerations**, including whether stakeholders may face barriers to participation, access to information, compensation, livelihood restoration measures, Project benefits, or grievance mechanisms.

The results of the stakeholder analysis indicate that Project-Affected Persons (PAPs), affected communities, ATR/BPN and land acquisition authorities, village governments, district governments, and key Project implementation agencies represent the highest-priority stakeholders for engagement due to their direct involvement in Project implementation and their exposure to potential Project impacts.

The analysis also identified vulnerable and disadvantaged groups that may require additional support and targeted engagement measures to ensure their meaningful participation in Project consultations and decision-making processes. These include vulnerable households affected by land acquisition, female-headed households, elderly persons, persons with disabilities, low-income households, and other vulnerable stakeholders identified during Project implementation.

The stakeholder analysis will be reviewed and updated periodically throughout Project implementation to reflect changes in Project activities, implementation arrangements, stakeholder concerns, and emerging environmental and social issues.

5.4. Stakeholder Prioritization Approach

Stakeholders have been prioritized based on two principal criteria:

- **Level of Influence**: the stakeholder's ability to affect Project decisions, implementation, stakeholder perceptions, regulatory approvals, or Project outcomes; and
- **Level of Interest/Impact**: the degree to which the stakeholder may be affected by or interested in Project activities and outcomes.

Combining these criteria enables the Project to prioritize engagement resources and tailor communication and consultation activities according to stakeholder needs. Stakeholders with high influence and high interest require close and continuous engagement, while stakeholders with lower influence or lower levels of project impact may require less intensive engagement and information disclosure measures.

5.5. Stakeholder Mapping

Stakeholder mapping was undertaken to categorize stakeholders according to their level of influence over Project activities and their level of interest in, or exposure to, Project impacts and

outcomes. The purpose of the mapping exercise is to support the development of engagement strategies that are proportionate to stakeholder needs, concerns, and their potential role in Project implementation. The stakeholder mapping process considered the following factors:

- the stakeholder's level of influence over Project decisions, approvals, implementation activities, or stakeholder perceptions;
- the degree to which the stakeholder may be affected by Project activities and impacts;
- the stakeholder's level of interest in Project planning, implementation, environmental and social performance, and outcomes;
- the stakeholder's ability to facilitate or constrain Project implementation; and
- the extent to which the stakeholder may require targeted information disclosure, consultation, or support measures.

Based on these considerations, stakeholders have been mapped according to their relative levels of influence and interest. The results of the mapping exercise assist the Project in determining the frequency, methods, and intensity of stakeholder engagement activities during Project implementation. In general:

- Stakeholders with **high influence and high interest** require regular consultation and active involvement in Project planning and implementation activities.
- Stakeholders with **high influence but lower levels of direct impact** require ongoing coordination and information sharing to support effective Project implementation.
- Stakeholders with **high interest but lower influence**, particularly Project-Affected Persons (PAPs) and local communities, require frequent communication, consultation, and access to grievance mechanisms.
- Stakeholders with **lower levels of influence and interest** will be kept informed through periodic information disclosure and communication activities.

The stakeholder mapping results are presented in the stakeholder analysis matrix below and will be reviewed periodically throughout Project implementation to reflect changes in stakeholder interests, Project activities, and emerging environmental and social issues.

5.5.1. Stakeholder Influence–Interest Matrix

Table 2 presents the stakeholder influence–interest matrix developed for the Project. The matrix provides a visual representation of stakeholder priorities and supports the allocation of engagement resources to stakeholder groups requiring the highest levels of consultation and communication.

The matrix is intended as a planning tool and does not imply fixed stakeholder positions. Stakeholder interests and influence may change over time as Project implementation progresses. Accordingly, the matrix will be reviewed and updated periodically as part of SEP implementation and monitoring.

Table 2. Stakeholder influence – interest matrix.

Influence	Interest	Typical Stakeholders	Engagement Strategy
High	High	PAPs, BPJN, ATR/BPN, Local Governments, PMU	Closely engage and regularly consult
High	Medium	Provincial agencies, regulators	Coordinate and keep informed
Medium	High	Local communities, village governments, vulnerable groups	Actively consult and provide feedback channels
Low	Medium/Low	Media, academic institutions, general public	Periodic disclosure and information sharing

5.6. Stakeholder Analysis Matrix

Project-Affected Parties (PAPs) constitute the primary stakeholder group for the Project because they may experience direct environmental, social, economic, land acquisition, livelihood, or construction-related impacts. Understanding their interests, concerns, and engagement needs is essential to ensuring that affected persons are appropriately informed, consulted, and able to participate in decisions that may affect them. The stakeholder analysis matrix below summarizes the

key Project-Affected Parties, their potential interests and concerns, and the corresponding engagement approaches that will be applied during Project implementation.

Table 2. Summary of the key Project-Affect Parties, interests, concerns and engagement.

Stakeholder Group	Interest in the Project	Potential Project Impact	Influence	Key Issues/Concerns	Engagement Approach
Project-Affected Persons (PAPs)	High	High	Medium	Land acquisition, compensation, livelihood restoration, payment schedules	Village consultations, FGDs, household meetings, disclosure of entitlement information, GRM
Farmers and plantation owners	High	High	Medium	Loss of productive land, access to agricultural areas, income restoration	Targeted consultations, household meetings, LRP consultations
Households adjacent to construction areas	High	Medium	Low	Noise, dust, traffic safety, access restrictions	Community meetings, information disclosure, GRM
Local businesses	Medium	Medium	Low	Access disruption, local procurement opportunities	Business consultations, periodic updates

Vulnerable Groups. Certain stakeholders may be disproportionately affected by Project impacts or may face challenges in accessing information, participating in consultations, or benefiting from Project mitigation and support measures. These vulnerable and disadvantaged groups may require targeted outreach, additional support, and tailored engagement approaches to ensure their meaningful participation throughout the Project lifecycle. The matrix below identifies the key vulnerable stakeholder groups and the specific engagement measures that will be implemented to address their needs.

Table 3. Summary of the key vulnerable groups and the specific engagement measures.

Stakeholder Group	Interest in the Project	Potential Project Impact	Influence	Key Issues/Concerns	Engagement Approach
Female-headed households	High	High	Low	Access to compensation and livelihood support	Household visits, targeted consultation
Elderly persons	High	Medium	Low	Access to information and compensation processes	Individual outreach, assistance during consultations
Persons with disabilities	High	Medium	Low	Accessibility of information and GRM	Accessible consultation methods and grievance channels
Poor and vulnerable households	High	High	Low	Livelihood restoration and ongoing support	Priority engagement and targeted assistance

Government agencies and Project implementation institutions play a critical role in Project planning, implementation, supervision, regulatory oversight, land acquisition, environmental and

social management, and stakeholder coordination. Effective engagement and coordination with these institutions are essential for ensuring compliance with applicable legal requirements, achieving Project objectives, and addressing stakeholder concerns in a timely manner. The matrix below summarizes the key institutional stakeholders, their interests, influence, and engagement requirements.

Table 4. Summary of the key institutional stakeholders, interests, influence and engagement.

Stakeholder Group	Interest in the Project	Potential Project Impact	Influence	Key Issues/Concerns	Engagement Approach
Ministry of Public Works / DGH	High	Low	High	Project implementation, compliance, delivery	Regular coordination meetings and reporting
BPJN Jambi	High	Low	High	Day-to-day implementation and stakeholder coordination	Regular coordination and monitoring meetings
ATR/BPN and Land Acquisition Teams	High	Medium	High	Land acquisition implementation, compensation, grievances	Intensive coordination throughout land acquisition
Regency/District Governments	High	Medium	High	Local impacts, coordination, grievance management	Formal coordination meetings
Village Governments	High	Medium	High	Community communications and stakeholder concerns	Regular village-level engagement

Other Interested Parties include organizations, groups, and individuals that may not be directly affected by Project activities but have an interest in the Project's implementation, environmental and social performance, or development outcomes. These stakeholders can contribute valuable perspectives, facilitate information dissemination, support community engagement, or influence public perceptions regarding the Project. The matrix below summarizes the principal interested parties and the engagement approaches that will be applied throughout Project implementation.

Table 5. Summary of principal interested parties and engagement approaches.

Stakeholder Group	Interest in the Project	Potential Project Impact	Influence	Key Issues/Concerns	Engagement Approach
NGOs and CSOs	Medium	Low	Medium	Environmental and social performance	Information disclosure and consultation meetings
Community leaders and religious leaders	High	Medium	High	Community acceptance and communication	Regular briefings and consultations

Stakeholder Group	Interest in the Project	Potential Project Impact	Influence	Key Issues/Concerns	Engagement Approach
Media	Medium	Low	Medium	Public information and project progress	Press releases and information disclosure

The stakeholder analysis matrix serves as the basis for developing the stakeholder engagement strategies presented in Chapter 6. The level and frequency of engagement will be proportionate to stakeholders' interests, influence, and potential exposure to Project impacts. The stakeholder analysis will be reviewed and updated periodically throughout Project implementation to reflect changes in stakeholder characteristics, Project activities, and emerging environmental and social issues.

5.6.1. Implications for Stakeholder Engagement

The stakeholder analysis indicates that the highest engagement priority should be given to Project-Affected Persons, affected communities, vulnerable households, village governments, ATR/BPN and land acquisition authorities, and key Project implementation agencies. These stakeholders have either high levels of Project exposure, significant influence over Project implementation, or both. Accordingly, the Project's stakeholder engagement program will focus on:

- maintaining regular communication with affected communities and PAPs;
- providing timely disclosure of land acquisition, compensation, and construction-related information;
- ensuring meaningful participation of vulnerable and disadvantaged groups;
- strengthening coordination with local governments and land acquisition agencies; and
- maintaining accessible and effective grievance management mechanisms.

5.7. Key Stakeholder Issues

Previous stakeholder engagement activities, socio-economic surveys, land acquisition planning activities, and consultations undertaken during Project preparation identified a number of recurring issues, concerns, expectations, and information needs among stakeholders. Understanding these issues is essential for designing targeted engagement activities, providing relevant information, addressing stakeholder concerns, and promoting meaningful participation throughout the Project lifecycle. While specific concerns vary across stakeholder groups and locations, several common themes emerged consistently during consultations. These issues have informed the stakeholder engagement strategies, information disclosure measures, grievance management arrangements, and environmental and social mitigation measures described in subsequent chapters of this SEP.

5.7.1. Land Acquisition and Compensation

Land acquisition and compensation were among the most frequently raised issues during stakeholder consultations. Affected persons sought information regarding compensation eligibility, valuation methodologies, compensation payment procedures, implementation schedules, treatment of different land tenure arrangements, and available grievance mechanisms. Stakeholders emphasized the importance of transparent communication regarding land acquisition processes and timely disclosure of information related to compensation entitlements and implementation schedules.

Stakeholder groups concerned:

- Project-Affected Persons (PAPs);
- Landowners and land users;
- Farmers and plantation owners;
- Village governments; and
- ATR/BPN and Land Acquisition Teams.

5.7.2. Livelihood Restoration and Economic Impacts

Stakeholders expressed concerns regarding potential loss of agricultural land, plantations, business activities, and other livelihood resources resulting from Project implementation. Particular attention

was given to the long-term economic impacts of land acquisition and the need for effective livelihood restoration measures.

Communities also expressed interest in employment opportunities, local procurement, skills development, and other economic benefits associated with Project implementation.

Stakeholder groups concerned:

- Affected households;
- Farmers;
- Plantation owners;
- Local businesses; and
- Vulnerable households.

5.7.3. Access, Mobility, and Community Connectivity

Communities emphasized the importance of maintaining access to residences, agricultural land, markets, public services, community facilities, and livelihood resources during both construction and operation of the toll road.

Stakeholders requested adequate crossings, access roads, overpasses, underpasses, and traffic management measures to minimize disruption to daily activities and maintain community connectivity.

Stakeholder groups concerned:

- Communities adjacent to the Project corridor;
- Village governments;
- Farmers and land users;
- Local businesses; and
- Road users.

5.7.4. Environmental and Community Health and Safety Impacts

Stakeholders raised concerns regarding potential environmental and community health and safety impacts associated with construction activities, including dust, noise, vibration, erosion, traffic hazards, construction-related accidents, and disruption of community activities.

Many stakeholders emphasized the need for effective mitigation measures, regular communication regarding construction schedules, and timely resolution of community concerns.

Stakeholder groups concerned:

- Nearby communities;
- Village governments;
- Local businesses; and
- Road users.

5.7.5. Flooding, Drainage, and Water Management

Stakeholders expressed concerns regarding potential changes to existing drainage patterns, river flows, and flood risks associated with Project construction and operation. Particular attention was requested for flood-prone locations and areas where community livelihoods depend on water resources and agricultural production. Communities emphasized the need for appropriate drainage design and ongoing monitoring of potential hydrological impacts.

Stakeholder groups concerned:

- Communities located near watercourses;
- Farmers and plantation owners;
- Village governments; and
- District authorities.

5.7.6. Information Disclosure and Communication

Stakeholders consistently emphasized the importance of timely, accurate, and accessible information regarding Project planning, land acquisition activities, compensation processes, construction schedules, potential environmental and social impacts, mitigation measures, and Project progress. Communities expressed a preference for regular communication through trusted and accessible channels, including village meetings, community consultations, local authorities, and project representatives.

Consultations also highlighted the need for clear and consistent communication regarding stakeholder rights, entitlements, available support measures, and opportunities for participation in Project decision-making processes. Maintaining transparent and proactive communication throughout the Project lifecycle will be essential for managing stakeholder expectations, building trust, and reducing misinformation.

Stakeholder groups concerned:

- Project-Affected Persons;
- Local communities;
- Village and subdistrict governments;
- Vulnerable and disadvantaged groups;
- Community leaders; and
- Other Interested Parties.

5.7.7. Grievance Management

Stakeholders emphasized the importance of having accessible, transparent, and responsive mechanisms through which Project-related concerns, complaints, and inquiries can be raised and addressed. Particular attention was given to issues related to land acquisition, compensation, construction impacts, community safety, environmental management, and implementation schedules.

Stakeholders highlighted the need for grievance procedures that are easy to access, culturally appropriate, free of charge, and capable of providing timely feedback and resolution. Communities also emphasized the importance of maintaining confidentiality where requested and ensuring that complainants are protected from retaliation or adverse consequences associated with raising concerns.

These stakeholder concerns have informed the design of the Project-level GRM, which is described in Chapter 7 of this SEP.

Stakeholder groups concerned:

- Project-Affected Persons;
- Local communities;
- Vulnerable and disadvantaged groups;
- Village governments;
- Community leaders; and
- Other Interested Parties.

5.7.8. Employment and Local Economic Opportunities

Stakeholders expressed interest in potential economic opportunities that may arise during Project construction and operation. In particular, communities highlighted the importance of providing fair and transparent access to local employment opportunities, skills development programs, and participation of local businesses in Project-related procurement and service activities.

Stakeholders also emphasized the need for clear communication regarding recruitment processes, eligibility criteria, and employment timelines to manage expectations and ensure equitable access to opportunities generated by the Project.

Stakeholder groups concerned:

- Local communities;
- Affected households;
- Youth and working-age populations;
- Local businesses and service providers; and
- Village governments.

5.8. Grievance Mechanism

An effective grievance mechanism is an important component of stakeholder engagement and provides stakeholders with a formal process through which Project-related concerns and complaints

can be raised and addressed. The Project will establish and maintain a GRM that is accessible, transparent, culturally appropriate, and responsive to the needs of affected communities and other stakeholders.

The GRM will serve as a key communication and feedback channel throughout Project implementation and will complement the stakeholder engagement activities described in this SEP. Information regarding the availability, procedures, and access points of the GRM will be disclosed to stakeholders through consultations, community meetings, information materials, and other communication channels.

Detailed procedures for grievance intake, registration, assessment, resolution, monitoring, and reporting are provided in Chapter 7.

5.9. Implications for Stakeholder Engagement

The stakeholder analysis indicates that PAPs, affected communities, vulnerable households, village governments, local authorities, ATR/BPN, and Project implementation agencies require the highest levels of engagement throughout Project implementation. Particular attention should be given to issues related to land acquisition and compensation, livelihood restoration, community access, environmental management, information disclosure, and grievance resolution.

These findings have informed the development of the Stakeholder Engagement Program presented in Chapter 6, including the identification of engagement methods, consultation frequency, disclosure requirements, stakeholder responsibilities, and monitoring arrangements.

6. Stakeholder Engagement Programme

6.1. Objectives of Stakeholder Engagement

The Stakeholder Engagement Program provides the framework for ongoing stakeholder engagement, consultation, participation, information disclosure, and feedback management throughout the Project lifecycle. The program has been developed based on the findings of previous stakeholder engagement activities, stakeholder analysis, environmental and social assessment processes, and land acquisition and resettlement planning undertaken during Project preparation.

The purpose of the Stakeholder Engagement Program is to ensure that stakeholders are appropriately informed, consulted, and provided with opportunities to participate in Project-related decision-making processes in a manner that is proportionate to their level of interest, influence, and exposure to Project impacts. The specific objectives of the Stakeholder Engagement Program are to:

- ensure timely, accurate, and accessible disclosure of Project information;
- maintain open and transparent communication with stakeholders throughout the Project lifecycle;
- provide Project-Affected Persons (PAPs) and other stakeholders with meaningful opportunities to express views, concerns, expectations, and recommendations;
- support implementation of land acquisition, compensation, resettlement, and livelihood restoration activities through continuous stakeholder engagement;
- ensure that vulnerable and disadvantaged groups are able to participate effectively in Project consultations and decision-making processes;
- establish accessible channels for obtaining stakeholder feedback and responding to stakeholder concerns;
- facilitate early identification and resolution of potential environmental and social issues; and
- support effective implementation of the Project's GRM.

Stakeholder engagement will be undertaken as a continuous process throughout Project preparation, land acquisition, construction, operation, and monitoring phases. Engagement approaches will be periodically reviewed and adjusted as Project activities progress and stakeholder needs evolve.

6.2. Principles of Stakeholder Engagement

Stakeholder engagement activities will be guided by the following principles:

- **Transparency:** providing stakeholders with timely, accurate, and understandable information about the Project and its potential impacts.
- **Inclusiveness:** ensuring that all stakeholder groups, including vulnerable and disadvantaged groups, have opportunities to participate.
- **Meaningful Participation:** providing stakeholders with opportunities to express their views and understand how their feedback has been considered.
- **Accessibility:** using communication and consultation methods that are appropriate to local contexts, literacy levels, languages, and stakeholder preferences.
- **Responsiveness:** ensuring stakeholder concerns are acknowledged, assessed, and addressed in a timely manner.
- **Cultural Appropriateness:** respecting local customs, community structures, and decision-making processes.
- **Continuous Engagement:** maintaining engagement throughout the Project lifecycle rather than limiting engagement to one-time consultation events.

6.3. Information Disclosure Strategy

6.3.1. Objectives of Information Disclosure

Information disclosure is a fundamental component of stakeholder engagement and enables stakeholders to understand the Project, its potential environmental and social impacts, mitigation measures, implementation arrangements, and opportunities for participation. Effective information disclosure promotes transparency, supports informed consultation, strengthens stakeholder trust, and facilitates timely identification and resolution of concerns.

The Project will implement a proactive and continuous information disclosure program throughout the Project lifecycle to ensure that stakeholders receive timely, accurate, accessible, and relevant information regarding Project activities and decisions that may affect them. The objectives of information disclosure are to:

- provide stakeholders with clear and understandable information regarding the Project and its implementation;
- support meaningful stakeholder participation in Project planning and implementation;
- ensure that Project-Affected Persons (PAPs) understand their rights, entitlements, and available support measures;
- communicate potential environmental and social risks, impacts, and mitigation measures;
- facilitate access to Project-related documents and information;
- support transparency and accountability in Project implementation; and
- ensure stakeholders are informed of available grievance and feedback mechanisms.

6.3.2. Information to be Disclosed

The type and level of information disclosed will vary depending on the Project phase and the information needs of different stakeholder groups. Information disclosed by the Project may include, but will not be limited to:

- Project description and objectives;
- Project schedule and implementation milestones;
- final design information relevant to affected stakeholders;
- environmental and social assessment findings;
- environmental and social management measures;
- Stakeholder Engagement Plan;
- Land Acquisition and Resettlement Action Plan;
- Livelihood Restoration Program (LRP);
- compensation eligibility criteria and entitlements;
- land acquisition and compensation implementation schedules;
- construction schedules and planned activities;
- community health and safety information;
- traffic management and access arrangements;
- employment and local recruitment opportunities;
- grievance redress procedures and contact information;
- monitoring results and implementation progress updates; and
- notifications regarding significant Project changes that may affect stakeholders.

Information will be disclosed in formats and languages that are understandable and accessible to affected communities and other stakeholders.

6.3.3. Information Disclosure Methods

The Project will utilize multiple communication channels to ensure that information reaches different stakeholder groups in a timely and accessible manner. Information disclosure methods will be selected based on stakeholder characteristics, information needs, literacy levels, accessibility considerations, and local communication preferences. Potential disclosure methods include:

- public consultation meetings;
- village and community meetings;
- focus group discussions;
- household visits and individual consultations;

- Project Information Booklets (PIBs);
- information leaflets and brochures;
- public notice boards;
- letters and formal notifications;
- village offices and government information centers;
- Project websites or electronic platforms, where available;
- social media and digital communication platforms;
- local media and public announcements; and
- stakeholder workshops and coordination meetings.

The Project may use a combination of disclosure methods to ensure broad stakeholder outreach and participation.

6.3.4. Disclosure Commitments

Information disclosure will be undertaken as a continuous and iterative process throughout the Project lifecycle. Stakeholders will be informed of key Project developments, implementation progress, significant changes to Project activities, and opportunities for consultation and feedback. Records of information disclosure activities will be maintained as part of SEP implementation and monitoring.

The disclosure requirements described in this section provide the basis for the stakeholder-specific engagement activities and disclosure measures presented in the Stakeholder Engagement Program in Section 6.6.

Table 6. Information Disclosure Requirements

Stakeholder Group	Information to be Disclosed	Disclosure Method	Timing
PAPs	LARP, compensation entitlements, payment schedule, livelihood restoration measures, GRM	Household meetings, PIBs, village meetings	Ongoing
Local Communities	Construction schedule, impacts, mitigation measures, traffic management	Community meetings, notice boards	Prior to and during construction
Vulnerable Groups	Assistance measures, compensation process, GRM	Household visits, targeted consultations	Ongoing
Village Governments	Project updates, stakeholder concerns, grievance statistics	Coordination meetings	Quarterly
Government Agencies	Project progress, E&S performance, compliance status	Reports, formal meetings	Quarterly/Semi-annually
General Public	Project updates and major milestones	Website, public notices, media	As needed

6.4. Stakeholder Engagement Methods

The Project will employ a range of stakeholder engagement and information disclosure methods throughout the Project lifecycle. Different engagement methods will be selected depending on the purpose of engagement, stakeholder characteristics, level of influence and interest, accessibility requirements, and the nature of Project-related issues being discussed.

The use of multiple engagement methods will help ensure that stakeholders receive timely and accessible information and are provided with appropriate opportunities to raise concerns, provide feedback, and participate in Project decision-making processes. The methods described below will be applied flexibly and adapted as needed throughout Project implementation.

Table 7. Stakeholder Engagement and Information Disclosure Methods

Method	Purpose	Typical Stakeholders	Application
Information Leaflets, Posters and Brochures	Disseminate Project information in a clear and accessible format	PAPs, local communities, vulnerable groups	Project introduction, land acquisition, GRM, construction schedule, safety awareness
Project Website and Digital Platforms	Provide continuous access to Project information and disclosure documents	General public, government agencies, NGOs	Disclosure of ESIA, SEP, LARP, LRP, monitoring updates, contact details
Correspondence (letters, phone calls, email, messaging platforms)	Direct communication and notification	Government agencies, PAPs, community leaders	Meeting invitations, follow-up actions, disclosure notices
Formal Coordination Meetings	Institutional coordination and decision-making	Government agencies, BPJN, BPN, local governments, contractors	Project implementation, land acquisition, environmental and social management
Public Consultation Meetings	Information disclosure and consultation with affected stakeholders	PAPs, local communities, NGOs, Indigenous Peoples	Project updates, construction plans, environmental and social issues, grievance procedures
Focus Group Discussions (FGDs)	Consultation on specific issues and stakeholder concerns	Women, vulnerable groups, PAPs, Indigenous Peoples, livelihood groups	Livelihood restoration, compensation, gender issues, inclusion measures
Household Visits and Individual Consultations	Direct engagement with affected persons requiring targeted support	Vulnerable households, severely affected PAPs	Compensation, livelihood restoration, grievance resolution
Notice Boards and Public Information Displays	Public disclosure of key Project information	Communities and road users	Construction schedules, traffic diversions, consultation notices, contact information
Site Visits and Joint Field Inspections	Facilitate stakeholder understanding of Project activities and impacts	Communities, local governments, NGOs	Construction progress review, environmental and social monitoring

Consultation activities undertaken during Project implementation shall be documented using the stakeholder engagement record templates provided in **Attachment 5 (Stakeholder Engagement Templates)**. These templates may be adapted by the PIU as needed to reflect Project-specific requirements.

The engagement methods described above provide the primary mechanisms through which information will be disclosed and consultations will be conducted. Specific stakeholder engagement activities, topics, timing, and responsibilities are presented in the Stakeholder Engagement Program in Section 6.4.

6.4.1. Stakeholder Engagement During Land Acquisition and Livelihood Restoration

Given the significance of land acquisition, compensation, resettlement, and livelihood restoration activities under the Project, additional disclosure measures will be implemented for PAPs and affected communities.

Information disclosed to affected persons will include, as applicable:

- eligibility criteria for compensation and assistance;
- compensation valuation principles and procedures;
- inventory and asset verification processes;
- compensation payment procedures and schedules;
- livelihood restoration measures and participation opportunities;
- relocation assistance, where applicable;
- grievance procedures related to land acquisition and resettlement; and
- progress updates on implementation of the LARP and LRP.

Disclosure activities will be undertaken sufficiently in advance of key decisions and implementation activities to allow affected persons adequate time to understand information, seek clarification, provide feedback, and prepare for implementation activities.

6.4.2. Stakeholder Engagement During Construction

During construction, stakeholder engagement activities will focus on communication regarding construction schedules, community health and safety, access management, environmental mitigation measures, and grievance resolution.

Construction-stage engagement activities may include:

- community information meetings;
- contractor-community coordination meetings;
- village consultations;
- disclosure of construction schedules and traffic diversions;
- community health and safety awareness activities;
- grievance mechanism awareness campaigns; and
- disclosure of emergency contact information.

Contractors, CSC personnel, Community Liaison Officers (CLOs), and BPJN representatives will support implementation of construction-stage stakeholder engagement activities.

6.4.3. Engagement of Vulnerable and Disadvantaged Groups

The Project recognizes that certain stakeholders may face barriers to participation in stakeholder engagement processes or may be disproportionately affected by Project impacts. Accordingly, targeted measures will be implemented to ensure meaningful participation of vulnerable and disadvantaged groups.

Such measures may include:

- household visits;
- small-group consultations;
- targeted disclosure activities;
- assistance during consultations;
- flexible consultation schedules;
- use of local languages where appropriate;
- support in accessing grievance mechanisms; and
- dedicated consultations regarding compensation and livelihood restoration.

The Project will periodically review stakeholder engagement approaches to determine whether additional support measures are required.

6.5. Stakeholder Engagement Program

The Stakeholder Engagement Program translates the commitments and engagement approaches outlined in this SEP into a structured implementation framework. The program identifies key

stakeholder engagement activities to be undertaken during different phases of the Project, including the objectives, key discussion topics, engagement methods, target stakeholders, responsibilities, and indicative timing of engagement activities.

The Stakeholder Engagement Program is intended to serve as a practical tool for planning, implementing, monitoring, and documenting stakeholder engagement throughout the Project lifecycle. As Project activities progress, the program will be reviewed and updated periodically to reflect changes in Project design, implementation arrangements, stakeholder priorities, emerging issues, lessons learned, and feedback received through consultation and grievance management processes.

An indicative Stakeholder Engagement Program is presented in Table 8 while a more detailed sample Stakeholder Engagement Strategy is provided in **Attachment 2 (Indicative Stakeholder Engagement Strategy and Planning Framework)** as a reference for implementation planning. The attachment is intended to illustrate the types of stakeholder engagement activities that may be undertaken during different Project phases and should not be considered a fixed implementation workplan.

Prior to Project effectiveness, the PMU shall review, refine, and finalize the Stakeholder Engagement Program to ensure alignment with the final Project design, implementation arrangements, land acquisition and resettlement activities, environmental and social management requirements, and stakeholder needs. The finalized program should include specific activities, responsible entities, target stakeholders, engagement methods, implementation schedules, and monitoring arrangements.

The Stakeholder Engagement Program may be prepared for the entire Project implementation period and updated periodically (e.g., quarterly, semi-annually, or annually) as Project circumstances evolve. Alternatively, the Project may maintain a master Stakeholder Engagement Program supplemented by more detailed stakeholder engagement programs prepared for specific implementation periods (e.g., monthly, quarterly, or semi-annual periods). The level of detail and frequency of updates should be commensurate with Project activities, stakeholder engagement needs, and the significance of environmental and social risks and impacts during each phase of implementation.

Table 8. Stakeholder Engagement Program

Project Phase	Engagement Activity	Key Topics	Objective	Method	Target Stakeholders	Frequency/Timing
Pre-Construction	Project Introduction and Information Disclosure	Project scope, design, schedule, anticipated impacts, benefits	Ensure stakeholders are informed and able to participate effectively	Public consultations, meetings, disclosure materials	PAPs, communities, local governments, NGOs, Indigenous Peoples, vulnerable groups	Prior to construction and as needed
Pre-Construction	Disclosure of ESIA, SEP, LARP, LRP and Other E&S Documents	Project impacts, mitigation measures, compensation arrangements	Ensure transparency and informed participation	Public meetings, website disclosure, village office disclosure	All stakeholders	Following document finalization and updates
Pre-Construction and	GRM Awareness and Outreach	Grievance procedures, contact	Ensure accessibility	Meetings, posters, brochure	PAPs, communities, workers,	Continuous

Project Phase	Engagement Activity	Key Topics	Objective	Method	Target Stakeholders	Frequency/Timing
Constructi on		persons, complaint channels	of grievance mechanisms	s, informati on boards	Indigenous Peoples	
Pre-Constructi on and Constructi on	Land Acquisition and Compensation Consultations	Asset inventory, valuation, compensation process, entitlement s	Support implementati on of the LARP	Househol d consultati ons, FGDs, public meetings	PAPs and affected communities	Throughout LARP implementation
Pre-Constructi on and Constructi on	LRP Consultations	Livelihood restoration measures, vulnerable household support	Ensure PAP participation in restoration activities	FGDs, househol d visits	PAPs, vulnerable households	Throughout LRP implementation
Pre-Constructi on, Constructi on and Operation	Stakeholder Coordination Meetings	Project implement ation issues, community concerns, mitigation measures	Strengthen coordination and problem-solving	Formal meetings	Government agencies, BPJN, village authorities	Quarterly or as required
Constructi on	Construction Impact Management Consultations	Traffic, dust, noise, community safety, access managemen t	Minimize community disruption and strengthen communicati on	Public meetings , notice boards, communit y meetings	Communities near construction sites	Prior to and throughout construction
Constructi on	Employment and Local Economic Opportunities	Recruitme nt procedures , local employme nt opportuniti es	Promote equitable access to Project benefits	Communit y meetings , FGDs	Local communities, vulnerable groups	As opportunities arise
Constructi on	Community Development and Social Investment Consultations	Community priorities, local developme nt initiatives	Align community support programs with local needs	FGDs, consultati ons	Communities, local governments	Annually or as required
Constructi on and Operation	Vulnerable Group Engagement	Inclusion measures, access to benefits, grievance support	Ensure meaningful participation of vulnerable groups	Targeted FGDs, househol d visits	Women, elderly, persons with disabilities, poor households	As required
Constructi on and Operation	Gender Consultations	Women's participatio n, employme nt, safety,	Promote gender-inclusive Project	Women-focused FGDs and	Women stakeholders	As required

Project Phase	Engagement Activity	Key Topics	Objective	Method	Target Stakeholders	Frequency/Timing
		livelihood support	implementation	consultations		
Construction and Operation	Indigenous Peoples Engagement	Project impacts, culturally appropriate mitigation measures, benefits	Ensure culturally appropriate engagement and participation	Community meetings, FGDs	Indigenous Peoples communities and representatives	As required
Construction and Operation	Environmental and Social Monitoring Disclosure	Monitoring results, implementation progress, corrective actions	Improve transparency and accountability	Meetings, village disclosures, public information boards	Communities, NGOs, local governments	Periodically
Construction and Operation	Stakeholder Perception Surveys	Stakeholder satisfaction and concerns	Assess effectiveness of engagement activities	Surveys and interviews	Representative stakeholder groups	Annually
Construction and Operation	Stakeholder Analysis Review	Stakeholder influence, interests, emerging issues	Update stakeholder engagement approaches	Interviews, surveys, internal reviews	All stakeholder categories	Annually
Operation	Operational Performance and Road Safety Consultations	Road safety, operations, maintenance activities	Maintain communication with affected communities	Public meetings, community consultations	Communities, road users, local governments	Annually and as needed

6.6. Resources and Responsibilities

Implementation of this SEP will be undertaken by DGH through the PMU, PIU, BPJN Jambi, contractors, CSC, environmental and social specialists, Community Liaison Officers (CLOs), ATR/BPN, and relevant local government agencies.

The responsibilities of different entities for stakeholder engagement activities are summarized in Chapter 7. Adequate financial, technical, and human resources will be allocated to ensure effective implementation of stakeholder engagement, information disclosure, grievance management, and monitoring activities.

6.7. Monitoring and Reporting of Stakeholder Engagement

Stakeholder engagement activities will be monitored throughout Project implementation to assess effectiveness and identify opportunities for improvement.

Monitoring indicators may include:

- number of consultations conducted;
- number of participants disaggregated by stakeholder category;
- participation of vulnerable groups;
- number of information disclosure activities conducted;
- grievances received and resolved;
- stakeholder feedback received; and
- corrective actions undertaken.

Results of stakeholder engagement activities will be documented and incorporated into regular Project monitoring reports.

6.8. Future Stakeholder Engagement Planning and SEP Updates

This SEP is a living document and will be periodically reviewed and updated throughout the Project lifecycle to reflect changes in Project design, implementation arrangements, stakeholder interests, environmental and social risks and impacts, consultation outcomes, grievance trends, and lessons learned during implementation.

The Project recognizes that stakeholder engagement requirements may evolve over time. Accordingly, stakeholder identification, stakeholder analysis, information disclosure requirements, engagement methods, consultation priorities, and grievance management arrangements will be reviewed periodically to ensure that they remain relevant, effective, and responsive to stakeholder needs.

The indicative Stakeholder Engagement Program presented in **Table 8** and the sample Stakeholder Engagement Strategy provided in **Attachment 2** provide the initial framework for stakeholder engagement planning during Project implementation. Prior to Project effectiveness, the PMU shall review and update these frameworks to develop a detailed Stakeholder Engagement Program that reflects the final Project design, implementation schedule, land acquisition and resettlement activities, environmental and social management requirements, and stakeholder priorities.

During implementation, stakeholder engagement planning may be undertaken through either:

- a single Stakeholder Engagement Program covering the full implementation period and updated periodically (e.g., quarterly, semi-annually, or annually); or
- a master Stakeholder Engagement Program supplemented by more detailed stakeholder engagement work plans prepared for specific implementation periods, such as quarterly or semi-annual implementation cycles.

The level of detail and frequency of updates will be commensurate with the scale of Project activities, stakeholder engagement requirements, and the significance of environmental and social risks and impacts during each implementation phase. The SEP shall be reviewed at least annually and updated, as necessary, to:

- incorporate changes to Project activities and implementation arrangements;
- reflect findings from stakeholder engagement activities and monitoring results;
- address emerging stakeholder concerns and grievances;
- update stakeholder identification and analysis where necessary;
- strengthen engagement approaches for vulnerable and disadvantaged groups; and
- reflect revisions to applicable environmental and social instruments.

Updated versions of the SEP and associated stakeholder engagement planning documents will be disclosed in accordance with the information disclosure arrangements described in this SEP. Significant revisions to the SEP will be communicated to relevant stakeholders and, where required, submitted to AIIB for review and disclosure.

7. ROLES, RESPONSIBILITIES AND RESOURCES FOR STAKEHOLDER ENGAGEMENT

7.1. Introduction

Effective implementation of this SEP requires clear institutional arrangements, adequate human and financial resources, defined responsibilities, and effective coordination among Project implementing agencies, contractors, consultants, local authorities, and other stakeholders. Stakeholder engagement is a shared responsibility involving multiple entities; however, overall accountability for implementation of this SEP rests with the DGH through the PMU and PIU.

This chapter defines the institutional arrangements, roles and responsibilities, resource requirements, coordination mechanisms, and budgetary provisions necessary to support implementation of stakeholder engagement, information disclosure, consultation, grievance management, monitoring, and reporting activities throughout the Project lifecycle.

7.2. Institutional Arrangements

The Project will implement stakeholder engagement through a multi-level institutional framework involving national agencies, Project implementation units, local authorities, contractors, land acquisition agencies, consultants, and community representatives. The institutional arrangements are intended to ensure that stakeholder engagement is integrated into all phases of Project preparation, land acquisition, construction, operation, environmental and social management, and grievance redress. The principal institutions responsible for implementation of this SEP include:

- DGH;
- PMU;
- PIU;
- BPJN Jambi;
- ATR/BPN and LAIT;
- Provincial, Regency/District, Subdistrict and Village Governments;
- PT Hutama Karya (Persero);
- Construction Supervision Consultant (CSC);
- Project Management Consultant (PMC);
- Environmental and Social Specialists;
- Civil Works Contractors; and
- Community Liaison Officers (CLOs), where appointed.

7.3. Roles and Responsibilities

7.3.1. Directorate General of Highways (DGH)

As Executing Agency, DGH has overall responsibility for ensuring effective implementation of this SEP and compliance with applicable Indonesian regulatory requirements and AIIB environmental and social requirements.

Key responsibilities include:

- overall oversight of SEP implementation;
- ensuring adequate institutional capacity and budget allocation;
- coordination with AIIB, IsDB and relevant government agencies;
- review of stakeholder engagement performance;
- oversight of grievance management and reporting; and
- approval of significant updates to the SEP.

7.3.2. Project Management Unit (PMU)

The PMU, housed within DSSPJJ, shall provide strategic oversight and coordination of SEP implementation.

Key responsibilities include:

- overseeing implementation of stakeholder engagement activities;
- ensuring adequate resources are available;

- coordinating stakeholder engagement across Project entities;
- reviewing monitoring results and stakeholder feedback;
- consolidating stakeholder engagement records;
- coordinating reporting to financiers; and
- ensuring periodic review and updating of the SEP.

7.3.3. Project Implementation Unit (PIU)

The PIU shall have primary responsibility for day-to-day implementation of this SEP.

Key responsibilities include:

- planning and implementing stakeholder engagement activities;
- organizing consultation meetings and disclosure events;
- implementing the Stakeholder Engagement Program;
- maintaining stakeholder engagement records;
- coordinating GRM implementation;
- engaging directly with PAPs and affected communities;
- overseeing engagement related to LARP and LRP implementation; and
- preparing periodic stakeholder engagement reports.

7.3.4. BPJN Jambi

BPJN Jambi shall support field-level implementation of the SEP and serve as a key interface between the Project and local stakeholders.

Key responsibilities include:

- supporting consultations and disclosure activities;
- coordinating with local governments and village authorities;
- facilitating communication with affected communities;
- supporting grievance resolution;
- supporting monitoring activities; and
- contributing to implementation reporting.

7.3.5. ATR/BPN and Land Acquisition Implementation Team (LAIT)

ATR/BPN and LAIT shall lead stakeholder engagement activities directly related to land acquisition, compensation, and land rights administration.

Key responsibilities include:

- disclosure of land acquisition information;
- consultations with affected landowners and users;
- communication of valuation and compensation procedures;
- management of land acquisition grievances;
- support to compensation negotiations; and
- participation in implementation monitoring and reporting.

7.3.6. Local Governments and Village Authorities

Local governments and village administrations play a critical role in supporting communication between the Project and affected communities.

Their responsibilities include:

- facilitating consultations and community meetings;
- supporting disclosure activities;
- assisting community outreach;
- supporting vulnerable households;
- facilitating grievance resolution; and
- supporting livelihood restoration activities where appropriate.

7.3.7. Contractors and Construction Supervision Consultant

During construction, contractors shall play a key role in stakeholder communication associated with construction activities and impacts.

Responsibilities include:

- providing construction-related information;
- supporting implementation of community health and safety communication;
- managing construction-related grievances;
- maintaining communication with nearby communities;
- supporting stakeholder monitoring activities; and
- reporting stakeholder concerns to the PIU and CSC.

The CSC shall support oversight and monitoring of stakeholder engagement and grievance management activities during construction.

7.3.8. Community Liaison Officers (CLOs)

Where appropriate, the Project may appoint Community Liaison Officers (CLOs) to strengthen communication between the Project and local communities.

CLO responsibilities may include:

- supporting information dissemination;
- facilitating community consultations;
- assisting vulnerable households;
- supporting grievance management;
- monitoring stakeholder concerns; and
- maintaining communication with affected communities throughout implementation.

7.4. Stakeholder Engagement Management and Documentation

The PIU shall establish and maintain a stakeholder engagement management system to ensure that stakeholder engagement activities are properly documented, tracked, monitored, and reported.

The management system may include:

- stakeholder database;
- consultation records and attendance sheets;
- commitments register;
- grievance database;
- disclosure records;
- stakeholder feedback tracking system;
- monitoring reports; and
- SEP update records.

Sample documentation formats, including stakeholder engagement activity records, attendance sheets, commitments registers, and disclosure records, are provided in **Attachment 5 (Stakeholder Engagement Templates)**.

All stakeholder engagement activities undertaken under this SEP shall be documented and retained throughout Project implementation.

7.5. Human Resources and Capacity

Implementation of this SEP will require adequately qualified personnel and institutional capacity at both central and field levels.

The Project shall ensure that:

- qualified environmental and social specialists are assigned to the PMU and PIU;
- CSC and PMC teams include appropriate stakeholder engagement and social specialists;
- contractors appoint qualified personnel responsible for community relations and grievance management;
- sufficient field staff are available to support stakeholder engagement activities; and
- personnel receive appropriate training on stakeholder engagement, information disclosure, grievance management, gender inclusion, vulnerable group engagement, and community health and safety.

7.6. Resources and Budget

Adequate financial resources shall be allocated to ensure effective implementation of this SEP throughout the Project lifecycle. Budget requirements will vary depending on Project phase, stakeholder engagement needs, land acquisition activities, consultation requirements, grievance management workload, and monitoring activities. Funding for stakeholder engagement activities shall be incorporated into Project implementation budgets and updated periodically as part of annual work planning and budgeting processes. Costs may include:

- consultation meetings and workshops;
- stakeholder outreach activities;
- disclosure materials and information booklets;
- translation and printing costs;
- communication materials and notice boards;
- stakeholder surveys;
- community liaison activities;
- grievance management activities;
- monitoring and reporting;
- training and capacity building; and
- specialist and consultant support.

7.6.1. Indicative Budget for Stakeholder Engagement Implementation

Adequate financial resources will be allocated to support implementation of the SEP throughout the Project lifecycle. The budget presented below is indicative and intended for planning purposes only. Actual budget requirements will be determined and updated by the PMU and PIU during Project implementation based on annual work plans, the finalized Stakeholder Engagement Program, stakeholder engagement needs, land acquisition and livelihood restoration activities, construction progress, and monitoring results. The budget shall be reviewed and updated periodically to ensure sufficient resources are available to implement stakeholder engagement, information disclosure, grievance management, monitoring, reporting, and capacity-building activities throughout the Project lifecycle.

Table 9. Indicative Budget Categories for SEP Implementation

Budget Category	Examples of Activities
Information Disclosure	Printing, translation, disclosure materials, websites, notice boards
Public Consultations	Village meetings, FGDs, workshops, venue and logistics costs
Land Acquisition and Livelihood Restoration Engagement	PAP consultations, household visits, targeted meetings
Vulnerable Group Engagement	Targeted outreach, accessibility support, household consultations
Grievance Management	GRM operation, communications, awareness campaigns
Monitoring and Reporting	Surveys, data management, reporting
Training and Capacity Building	Staff and contractor training
Community Liaison Activities	CLO support and stakeholder communication

The detailed budget for stakeholder engagement activities will be prepared and updated by the PMU and PIU as part of Project implementation planning and shall be reviewed periodically to ensure sufficient resources are available to implement the SEP effectively.

The budget below is indicative and intended for planning purposes. Actual budget allocations and expenditures will be finalized by the PMU/PIU during Project implementation and updated periodically based on the annual Stakeholder Engagement Program, progress of land acquisition and resettlement activities, construction schedules, stakeholder needs, and monitoring results.

Table 10. Indicative Budget for SEP Implementation

No.	Activity	Unit	Quantity	Unit Cost (IDR)	Estimated Budget (IDR)
A. Pre-Construction Phase					
1	Disclosure of Project information, Project design, schedule, and anticipated impacts	Package	1	75,000,000	75,000,000
2	Disclosure of environmental and social documents (ESIA, SEP, LARP, LRP, ESMP and related documents)	Package	1	75,000,000	75,000,000
3	Preparation, translation, printing, and distribution of Project Information Booklets (PIBs), leaflets, posters, and information materials	Package	1	50,000,000	50,000,000
4	Public consultations on land acquisition, compensation, resettlement, and livelihood restoration	Meeting	12	15,000,000	180,000,000
5	Household visits and targeted consultations with vulnerable households and severely affected PAPs	Visit	150	500,000	75,000,000
6	Public consultations on GRM and stakeholder engagement arrangements	Meeting	4	12,500,000	50,000,000
7	Gender, Indigenous Peoples (if applicable), and vulnerable group consultations/FGDs	Session	8	10,000,000	80,000,000
8	GRM awareness and outreach activities	Campaign	4	12,500,000	50,000,000
Subtotal Pre-Construction					635,000,000
B. Construction Phase					
9	Community consultations on construction progress, traffic management, access arrangements, and community safety	Meeting	12	15,000,000	180,000,000
10	Stakeholder coordination meetings with local governments, agencies, and village authorities	Meeting	8	12,500,000	100,000,000
11	Consultations on environmental and social impact mitigation measures and monitoring results	Meeting	8	12,500,000	100,000,000
12	LRP consultations, monitoring, and follow-up meetings	Session	12	15,000,000	180,000,000
13	Consultations and information dissemination on local employment and business opportunities	Session	8	10,000,000	80,000,000
14	Community development and empowerment consultations	Session	8	10,000,000	80,000,000

No.	Activity	Unit	Quantity	Unit Cost (IDR)	Estimated Budget (IDR)
15	Targeted outreach and inclusive engagement activities for vulnerable groups	Package	1	100,000,000	100,000,000
16	Operation of Project-level GRM, grievance communications, and complaint resolution outreach	Year	1	100,000,000	100,000,000
17	Community liaison, stakeholder communications, disclosure updates, and engagement support	Year	1	150,000,000	150,000,000
18	Preparation and maintenance of notice boards, public information displays, and disclosure materials	Package	1	35,000,000	35,000,000
19	SEP monitoring, stakeholder database management, and reporting	Quarter	4	15,000,000	60,000,000
Subtotal Construction					1,165,000,000
C. Operation Phase					
20	Stakeholder consultations on toll road operation, maintenance, road safety, and community concerns	Meeting	4	15,000,000	60,000,000
21	Stakeholder perception surveys and feedback assessments	Survey	1	60,000,000	60,000,000
22	Review of stakeholder analysis and update of SEP and engagement approaches	Review	1	40,000,000	40,000,000
23	Continued information disclosure and stakeholder communications	Package	1	40,000,000	40,000,000
Subtotal Operation					200,000,000
D. Capacity Building and Training					
24	Training on stakeholder engagement, consultation techniques, GRM operation, and documentation for PMU, PIU, contractors, and consultants	Training	2	25,000,000	50,000,000
Subtotal Capacity Building					50,000,000
E. Contingency (Approximately 10%)					205,000,000
TOTAL INDICATIVE SEP IMPLEMENTATION BUDGET					2,255,000,000

Notes

1. The budget is indicative and may be refined during Project implementation based on the finalized Stakeholder Engagement Program and annual work plans.
2. Certain stakeholder engagement activities related to construction management, community relations, grievance management, and information disclosure may be financed through contractor, supervision consultant, or other Project implementation budgets, where applicable.
3. The PMU/PIU shall review and update the budget periodically to ensure adequate resources are allocated for stakeholder engagement activities throughout the Project lifecycle.

4. Detailed Stakeholder Engagement Programs prepared prior to Project effectiveness and during implementation may further specify activity frequency, locations, responsible parties, and corresponding budget needs.

7.6.2. Budget by Project Phase

To facilitate planning, stakeholder engagement costs may also be allocated according to Project phase.

Table 11. Indicative SEP Budget by Project Phase

Project Phase	Main Activities	Indicative Budget Range (IDR) per year
Pre-Construction	Information disclosure, consultations, LARP and LRP consultations, GRM establishment, stakeholder mapping	635,000,000
Construction	Regular consultations, construction impact communication, grievance management, monitoring, vulnerable group engagement, stakeholder surveys	1,165,000,000
Operation	Operational consultations, disclosure, stakeholder surveys, GRM operation, periodic monitoring	200,000,000

7.6.3. Budget Management

The PMU shall ensure that adequate funding is available for implementation of stakeholder engagement activities throughout the Project lifecycle. Annual stakeholder engagement budgets shall be incorporated into Project work plans and budget proposals. Contractors shall also allocate adequate resources for construction-related stakeholder engagement, community communication, grievance management, and disclosure activities as required under the construction contracts and associated environmental and social management requirements.

Budget allocations and expenditures related to SEP implementation shall be reviewed periodically as part of Project monitoring and reporting to ensure that stakeholder engagement activities remain adequately resourced and effective.

7.7. Contact Information

Stakeholders may contact the Project to request information, provide feedback, or raise concerns through the stakeholder engagement and grievance redress channels established by the Project. Prior to Project effectiveness, the PMU/PIU shall publicly disclose and periodically update:

- responsible office and focal point;
- postal address;
- telephone number;
- email address;
- Project website (if available); and
- grievance submission channels.

The contact information shall be disclosed through Project information materials, community consultations, village offices, and other stakeholder engagement channels.

8. Grievance Redress Mechanism

8.1. Purpose and Objectives

The Project will establish and maintain a Project-level GRM to receive, assess, and facilitate the resolution of concerns, complaints, and grievances related to Project activities and environmental and social performance. The GRM is intended to provide PAPs, workers, nearby communities, vulnerable groups, local authorities, and other stakeholders with an accessible, transparent, culturally appropriate, and responsive process for raising concerns and seeking resolution of Project-related issues.

The GRM will function as a complementary mechanism to existing administrative and judicial processes available under Indonesian law and will not prevent stakeholders from pursuing other legal or administrative remedies at any stage. The mechanism will be available throughout the Project lifecycle and will be implemented in a manner that is free of charge and without risk of retaliation, discrimination, intimidation, or coercion against complainants.

The Project-level GRM will cover grievances related to:

- land acquisition, compensation, resettlement, and livelihood restoration activities;
- environmental impacts and environmental management measures;
- construction-related impacts, including dust, noise, vibration, traffic disruption, access restrictions, and community health and safety risks;
- stakeholder engagement and information disclosure activities;
- labor and working conditions, where relevant interfaces exist between workers and communities;
- contractor and subcontractor activities;
- operation and maintenance of Project facilities; and
- other environmental and social issues arising from Project implementation.

The GRM will provide multiple channels for submission of grievances, including verbal and written complaints, telephone, email, community meetings, project representatives, village authorities, contractors, and other designated grievance focal points. Anonymous complaints will be accepted and managed to the extent possible.

All grievances received through the Project GRM will be recorded, tracked, and monitored through a grievance registry. The Project will seek to resolve grievances in a timely manner through dialogue, consultation, and mutually agreed solutions whenever possible. Special procedures will be established for handling sensitive grievances, including complaints related to sexual exploitation and abuse (SEA), sexual harassment (SH), and other confidential matters requiring survivor-centered and confidential treatment.

8.2. Scope of the Project-Level Grievance Redress Mechanism

The Project-level GRM is intended to receive, assess, and facilitate the resolution of concerns, complaints, and grievances arising from Project activities and environmental and social performance throughout the Project lifecycle. The GRM will be available to all Project stakeholders, including PAPs, nearby communities, vulnerable and disadvantaged groups, local authorities, civil society organizations, contractors, workers, and other interested parties.

The GRM will serve as a project-level mechanism for addressing environmental and social concerns in a timely, transparent, fair, and culturally appropriate manner. The mechanism is intended to complement, and not replace, existing administrative, judicial, and traditional dispute resolution mechanisms available under Indonesian law. The Project-level GRM may receive grievances related to, but not limited to:

- land acquisition, compensation, resettlement assistance, and livelihood restoration activities;

- environmental impacts, including dust, noise, vibration, water quality, erosion, pollution, waste management, and biodiversity-related concerns;
- construction-related impacts, including traffic disruptions, access restrictions, damage to property, and community health and safety risks;
- operation and maintenance activities;
- stakeholder engagement, information disclosure, and consultation processes;
- implementation of environmental and social mitigation measures;
- contractor and subcontractor activities;
- employment and local economic opportunities associated with the Project;
- community relations and social issues affecting Project stakeholders; and
- non-compliance with environmental and social commitments associated with the Project.

The Project will ensure that grievance procedures remain accessible to vulnerable and disadvantaged groups and that assistance is provided where necessary to facilitate submission and resolution of grievances.

8.2.1. Community Grievance Mechanism

The community GRM described in this SEP is intended for PAPs, affected communities, local governments, community organizations, vulnerable groups, and other stakeholders who may be affected by or have concerns regarding Project activities and environmental and social performance.

The community GRM will be accessible throughout Project preparation, land acquisition and livelihood restoration, construction, operation, and maintenance phases. Community grievances may be submitted through multiple channels, including village authorities, Project representatives, contractors, grievance focal points, telephone, email, written submissions, community meetings, and other designated communication channels.

8.2.2. Worker Grievance Mechanism

In addition to the community GRM, the Project will establish and maintain a separate Worker Grievance Mechanism in accordance with applicable labor requirements, national legislation, and AIIB ESF requirements. The Worker Grievance Mechanism will enable direct and contracted workers to raise workplace concerns and grievances relating to:

- terms and conditions of employment;
- wages, benefits, and working hours;
- occupational health and safety;
- workplace discrimination, harassment, or unfair treatment;
- worker accommodation and welfare facilities;
- labor management procedures; and
- other employment-related matters.

The Worker GRM will operate independently from the community GRM while maintaining appropriate coordination where grievances involve both workers and community stakeholders. Detailed procedures for worker grievance management will be established through the Project's Labor Management Procedures and contractor management systems.

8.2.3. Sensitive and Confidential Grievances

The Project recognizes that certain grievances may require special handling due to their sensitive nature. These may include allegations of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), gender-based violence (GBV), violence against children, retaliation, corruption, fraud, or other matters requiring confidentiality.

Such grievances will be managed through designated confidential channels and handled in a survivor-centered, culturally appropriate, and non-retaliatory manner. Sensitive grievances will not be processed through standard community grievance procedures where doing so could compromise confidentiality, safety, or the interests of affected persons.

Additional procedures for handling sensitive grievances, including SEA/SH complaints, shall be established by the Project prior to commencement of construction activities.

8.2.4. Relationship with Land Acquisition Grievance Procedures

Grievances related to land acquisition, compensation, resettlement assistance, livelihood restoration, valuation, and eligibility issues may be submitted through the Project-level GRM. Such grievances shall be coordinated with the agencies responsible for land acquisition implementation, including ATR/BPN, the Land Acquisition Implementation Team (LAIT), and relevant Project authorities.

Where required, resolution of land acquisition grievances shall also follow the applicable procedures established under Indonesian land acquisition legislation and the detailed grievance arrangements described in the Land Acquisition and Resettlement Plan. The Project-level GRM will serve as an accessible entry point for receiving, registering, tracking, and monitoring such grievances.

8.3. Principles of the Grievance Redress Mechanism

The Project-level GRM will be implemented in accordance with the principles of fairness, accessibility, transparency, accountability, inclusiveness, and continuous improvement. The GRM is intended to provide stakeholders with a trusted, effective, and culturally appropriate mechanism for raising concerns and seeking resolution of Project-related issues.

The GRM will be guided by the following principles:

a. Legitimacy

The GRM will operate through a clearly defined governance structure with designated responsibilities and decision-making authority. Grievance management processes will be implemented in a fair, impartial, and transparent manner to promote confidence among complainants and other stakeholders.

b. Accessibility

The GRM will be accessible to all stakeholders, including Project-Affected Persons (PAPs), vulnerable and disadvantaged groups, local communities, workers, government representatives, and other interested parties. Multiple grievance submission channels will be provided, and assistance will be made available to individuals who may face barriers related to literacy, disability, language, mobility, distance, or other factors.

c. Predictability

The GRM will include clearly defined procedures, responsibilities, escalation pathways, and response timelines. Stakeholders will be informed about the grievance process, expected timeframes, and available avenues for appeal if they are dissatisfied with the outcome.

d. Fairness and Equitability

Complainants will have a reasonable opportunity to present information, provide supporting evidence, and participate in the grievance resolution process. Grievances will be assessed objectively and consistently, with due consideration given to the views of all relevant parties.

e. Transparency

Stakeholders will be informed about the status of their grievances and the outcomes of the grievance process. The Project will maintain grievance records and periodically report on GRM implementation, while respecting confidentiality requirements where applicable.

f. Rights Compatibility

The GRM will seek resolutions that are consistent with applicable Indonesian laws and regulations, the Project's environmental and social commitments, and the requirements of the AIIB Environmental and Social Framework. The GRM will complement, and not replace, available administrative and judicial remedies.

g. Confidentiality and Protection from Retaliation

The Project will respect the confidentiality of complainants and protect personal information to the extent permitted by law. Stakeholders shall be able to raise concerns without fear of intimidation, discrimination, retaliation, harassment, or adverse consequences resulting from their participation in the grievance process.

h. Inclusiveness and Cultural Appropriateness

The GRM will be implemented in a manner that respects local customs, community structures, cultural practices, and stakeholder preferences. Special measures will be adopted where necessary to ensure meaningful access by women, elderly persons, persons with disabilities, low-income households, and other vulnerable or disadvantaged groups.

i. Survivor-Centered Approach for Sensitive Complaints

Sensitive grievances, including complaints related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), gender-based violence, violence against children, or other confidential matters, will be managed through survivor-centered procedures that prioritize confidentiality, safety, dignity, informed consent, and access to appropriate support services.

j. Continuous Learning and Improvement

The Project will periodically review grievance trends, stakeholder feedback, monitoring results, and lessons learned to strengthen the effectiveness of the GRM. Findings from grievance management will inform improvements to stakeholder engagement, environmental and social management measures, and Project implementation processes.

The principles outlined above will guide the design and implementation of the Project's grievance procedures, institutional arrangements, and escalation pathways. The organizational structure and responsibilities for grievance management are described in Section 8.4.

8.4. Institutional Arrangements and GRM Structure

8.4.1. Institutional Arrangements

Overall responsibility for implementation and oversight of the Project-level GRM rests with the DGH through the PMU and PIU. The PIU will be responsible for day-to-day administration of the GRM, including grievance registration, coordination of investigations, monitoring of grievance resolution, maintenance of grievance records, and reporting on GRM performance. The GRM will operate through a multi-level institutional structure designed to facilitate timely resolution of grievances at the lowest appropriate level while providing clear mechanisms for escalation where grievances cannot be resolved satisfactorily.

Project contractors, supervision consultants, local governments, village administrations, land acquisition authorities, and other relevant entities will support implementation of the GRM within their respective areas of responsibility.

8.4.2. Grievance Resolution Structure

The Project will establish a three-tier grievance resolution structure consisting of:

- Level 1 – Local/Field Level;
- Level 2 – Regional/Technical Implementation Unit (TIU); and
- Level 3 – Central Level (DGH).

The grievance resolution structure is intended to encourage early resolution of grievances through dialogue and consultation while ensuring that complainants have access to higher levels of review where issues remain unresolved.

Table 12. Project-Level Grievance Resolution Structure

Level	Lead Entity	Main Function	Indicative Resolution Time
Level 1	Local government; contractors (under supervision of the Head of the relevant Public Works Agency); CLOs, where applicable	Prompt resolution of straightforward, localized grievances through consultation, verification, and corrective action	See Table 13
Level 2	Technical Implementation Unit (TIU)	Reviews the grievance and actions taken at Level 1; undertakes further assessment or coordination, as required; issues a documented decision	See table 13
Level 3	DGH (Central Level)	Final review and Project-level decision, where the complainant remains dissatisfied after Level 2 or the grievance has strategic, policy, or cross-regional implications	See table 13

The Project-level GRM does not prevent complainants from pursuing available administrative, judicial, or other dispute resolution mechanisms provided under Indonesian law at any stage of the process.

8.4.3. Level 1 – Local / Field Level

At the first level, grievances are handled at the local or field level, with an emphasis on early and practical resolution.

This level includes:

- initial handling by local government;
- resolution of site-specific issues by contractors or the relevant stakeholder, under the supervision of the Head of the relevant Public Works Agency; and
- intake and facilitation by community-level points of contact or Community Liaison Officers (CLOs), where applicable.

Level 1 focuses on the prompt resolution of straightforward and localized grievances through consultation, verification, and corrective action. Grievances may be submitted formally or informally through village and subdistrict offices, designated grievance focal points, community representatives, Project representatives, or other approved channels.

8.4.4. Level 2 – Regional / Technical Implementation Unit (TIU)

If a grievance is not resolved at Level 1, requires coordination across multiple institutions or Project components, or involves significant, complex, or sensitive impacts, the grievance is escalated to the TIU. In this Project, the TIU refers to the Highways Implementation Office for Jambi (BPJN Jambi).

At this level, the TIU:

- reviews the grievance and actions taken at Level 1;
- undertakes further assessment or coordination, as required, including engaging relevant specialists, land acquisition authorities, and supervision consultants;
- issues a documented decision; and
- communicates the outcome to the complainant.

Escalation to Level 2 is intended for grievances requiring broader coordination or technical review beyond the local level.

8.4.5. Level 3 – Central Level (DGH)

- 1.a.1. If the complainant remains dissatisfied after resolution at the TIU level, or where the grievance has strategic, policy, or cross-regional implications, the grievance may be escalated to DGH (central level) for final review within the Project-level GRM.
- 1.a.2. At Level 3, DGH, led by the Directorate of Internal Compliance:
 1. reviews the grievance file and decisions taken at Levels 1 and 2;
 2. may seek additional clarification or technical input, as needed; and
 3. issues a final Project-level decision on the grievance.

Decisions at Level 3 represent the final level of resolution within the Project-level GRM. Access to administrative, judicial, or other dispute resolution mechanisms, and to the AIIB Project-affected People's Mechanism (PPM), remains available at any stage, as described in Section 8.9.

8.4.6. Grievance Focal Points

The Project will designate grievance focal points at appropriate levels of Project implementation to facilitate communication between stakeholders and the GRM. Grievance focal points will be responsible for:

- receiving grievances through available channels;
- maintaining grievance registers;
- supporting complainants during the grievance process;
- facilitating communication between complainants and responsible entities;
- monitoring progress of grievance resolution; and
- supporting grievance reporting and record keeping.

Contact details for grievance focal points will be disclosed through Project Information Booklets (PIBs), consultation meetings, village offices, notice boards, Project websites (if available), and other stakeholder communication channels.

8.4.7. Relationship with Land Acquisition Grievance Procedures

Grievances related specifically to land acquisition, compensation, valuation, resettlement assistance, livelihood restoration, and eligibility issues will be managed through the Project-level GRM and coordinated with the relevant land acquisition authorities, including ATR/BPN and the LAIT.

Where required, such grievances shall also follow applicable procedures established under Indonesian land acquisition legislation and the detailed grievance arrangements set out in the LARP. The Project-level GRM will serve as the common entry point for receiving, registering, tracking, and monitoring all Project-related grievances, regardless of subject matter.

8.5. Grievance Submission Channels

The Project will provide multiple, accessible, and culturally appropriate channels through which stakeholders may submit complaints, concerns, suggestions, inquiries, or grievances related to Project activities. Stakeholders may submit grievances free of charge and without fear of retaliation, discrimination, intimidation, or other adverse consequences. Grievances may be submitted by PAPs, local communities, vulnerable and disadvantaged groups, workers, community organizations, local government representatives, civil society organizations, or any other stakeholder affected by or interested in the Project. The Project will seek to ensure that grievance channels remain accessible throughout the Project lifecycle, including during land acquisition, construction, operation, and maintenance activities. Sample grievance submission forms are provided in **Attachment 3 (Sample Grievance Registration Form)**. The Project may adapt these forms as necessary to reflect implementation requirements.

8.5.1. Available Submission Channels

Stakeholders may submit grievances through one or more of the following channels:

- direct verbal communication with Project representatives;
- village or subdistrict offices;

- Village/Subdistrict Level GRC members;
- CLOs, where appointed;
- Grievance Redress Committee (GRC) members, where established;
- contractors and construction supervision personnel;
- designated grievance focal points;
- telephone hotline;
- SMS or messaging applications (e.g., WhatsApp);
- email;
- written grievance forms;
- suggestion boxes, where established;
- Project website or electronic platform, where available; and
- community meetings, consultations, and stakeholder engagement events.

Grievances submitted through contractors, village authorities, community representatives, or other Project personnel shall be promptly forwarded to the designated grievance focal point for registration and processing.

8.5.2. Anonymous Grievances

The Project will accept anonymous grievances and will make reasonable efforts to assess and address such grievances to the extent possible. However, the ability to investigate, respond to, and close anonymous grievances may be constrained where insufficient information is provided. Anonymous submissions will be recorded in the grievance registry and monitored in the same manner as other grievances.

8.5.3. Assistance for Vulnerable and Disadvantaged Groups

Recognizing that some stakeholders may face barriers in accessing grievance mechanisms, the Project will provide additional support where necessary to facilitate grievance submission and participation in the grievance resolution process. Support measures may include:

- household visits;
- verbal submission of grievances;
- assistance in completing grievance forms;
- use of local languages;
- support from community representatives;
- accessible communication methods for persons with disabilities; and
- targeted outreach to vulnerable households.

These measures are intended to ensure equitable access to the GRM and meaningful participation of vulnerable and disadvantaged stakeholders.

8.5.4. Information Disclosure and Awareness Raising

Information regarding the GRM, including submission channels, grievance procedures, responsible focal points, and indicative timelines, will be disclosed through stakeholder engagement activities and information disclosure channels established under this SEP. Information may be disseminated through:

- Project Information Booklets (PIBs);
- public consultation meetings;
- village meetings;
- notice boards;
- posters and leaflets;
- contractor information boards;
- Project websites or electronic platforms, where available; and
- other communication channels appropriate to local conditions.

GRM contact information shall be publicly disclosed prior to commencement of Project activities and updated as necessary throughout Project implementation.

8.5.5. Grievance Registration

All grievances received through the Project's grievance channels will be formally registered in the Project Grievance Registry. Each grievance will be assigned a unique reference number and recorded with, as applicable:

- date of receipt;
- complainant information (unless anonymous);
- grievance category;
- location;
- responsible entity;
- actions taken;
- status of resolution; and
- date of closure.

A sample grievance register is provided in **Attachment 4 (Sample Grievance Log/Register)** and may be used by the PIU and other implementing entities to monitor grievance status, actions taken, and resolution outcomes. The grievance registry will serve as the basis for monitoring, reporting, and evaluation of GRM performance throughout Project implementation.

Once received and registered, grievances will be assessed, investigated, and addressed in accordance with the grievance management process described in Section 8.6. The Project's grievance management process is designed to facilitate timely resolution of concerns while ensuring fairness, transparency, confidentiality, and appropriate opportunities for appeal and escalation.

8.6. Grievance Management Process

The Project will implement a structured grievance management process to ensure that concerns and complaints are received, registered, assessed, investigated, resolved, and monitored in a timely and transparent manner. The process is designed to encourage early resolution of issues at the lowest appropriate level while providing opportunities for escalation where grievances remain unresolved.

All grievances received through the Project-level GRM will be handled in accordance with the principles described in Section 8.3 and the institutional arrangements described in Section 8.4.

Step 1 – Receipt and Registration

Grievances may be submitted through any of the channels described in Section 8.5. Upon receipt, the grievance will be recorded in the Project Grievance Registry and assigned a unique reference number for tracking purposes.

Information recorded may include:

- date of receipt;
- grievance reference number;
- complainant details (unless anonymous);
- location;
- grievance category;
- preferred method of communication;
- responsible entity; and
- current status of the grievance.

The complainant will receive acknowledgement of receipt within **seven (7) working days** of submission where contact information is available.

Step 2 – Screening and Categorization

Following registration, the grievance will be reviewed and categorized according to its nature, urgency, and responsible entity.

Grievances may be classified into categories such as:

- land acquisition and compensation;
- livelihood restoration;

- environmental impacts;
- community health and safety;
- construction-related impacts;
- labor and working conditions;
- stakeholder engagement and information disclosure;
- contractor performance;
- SEA/SH and other sensitive matters; or
- other Project-related concerns.

Screening will also determine whether the grievance requires:

- immediate action;
- referral to a specialized mechanism;
- escalation to a higher level of the GRM; or
- coordination with relevant government agencies.

Step 3 – Assessment and Investigation

The responsible Project entity will review the grievance and undertake an appropriate assessment or investigation. Depending on the nature of the grievance, this may include:

- review of relevant records and documentation;
- consultations with the complainant;
- site visits and field verification;
- interviews with affected parties;
- consultations with contractors, consultants, or government agencies; and
- technical assessments where required.

The objective of the investigation is to establish the facts, understand the underlying causes of the grievance, and identify appropriate corrective or remedial actions.

Step 4 – Resolution and Response

Based on the outcome of the assessment or investigation, the responsible entity will propose and implement appropriate corrective actions, mitigation measures, or other resolutions.

Possible resolution measures may include:

- clarification or provision of additional information;
- corrective actions by contractors or Project personnel;
- implementation of mitigation measures;
- repair of Project-related damage;
- additional consultations or engagement activities;
- referral to relevant authorities or specialist services; or
- other mutually agreed solutions.

The Project will seek to communicate the proposed resolution to the complainant within **five (5) working days** following completion of the review (see Table 13), which itself normally takes 10–20 working days depending on complexity.

For more complex grievances requiring extended investigation, the complainant will be informed of the reasons for delay and the expected timeframe for completion.

Step 5 – Closure of Grievances

A grievance may be considered closed when:

- the complainant accepts the proposed resolution;
- agreed corrective actions have been implemented;
- no further action is required; or
- the grievance has been determined to fall outside the scope of the Project GRM and appropriate explanation has been provided.

Closure will be documented in the Grievance Registry, together with relevant records of actions taken and communications with the complainant.

Where a complainant is dissatisfied with the proposed resolution, the grievance may be escalated through the grievance resolution structure described in Section 8.4.

Step 6 – Escalation and Appeals

Where a grievance cannot be resolved at the initial level of review, or where the complainant is dissatisfied with the proposed resolution, the grievance may be escalated to the next level of the Project GRM.

The escalation process generally follows:

- **Level 1:** Local/Field Level;
- **Level 2:** Regional/Technical Implementation Unit (TIU);
- **Level 3:** Central Level (DGH).
- .

If a grievance remains unresolved after completion of the Project-level GRM process, the complainant may pursue other administrative, judicial, customary, or alternative dispute resolution mechanisms available under Indonesian law.

Use of the Project GRM does not prevent stakeholders from accessing judicial remedies at any stage of the process.

8.6.1. Indicative Grievance Resolution Timeframes

Table 13. Indicative GRM Timeframes

Activity	Indicative Timeframe
Acknowledgement of receipt	Within 7 working days of grievance submission
Screening and classification	Within 7 working days of registration
Review and investigation	Normally within 10–20 working days, depending on the complexity of the grievance
Communication of proposed resolution	Within 5 working days following completion of the review
Implementation of agreed actions	Within a reasonable timeframe agreed with the complainant, based on the nature of the resolution
Closure and documentation	Following resolution and agreement

The Project will seek to resolve grievances as quickly as possible. However, actual timeframes may vary depending on the complexity and nature of the grievance

Certain grievances may require specialized procedures because of their sensitive nature or legal context. The Project's arrangements for handling SEA/SH complaints, confidential grievances, vulnerable group concerns, and land acquisition-related grievances are described in Sections 8.7 and 8.8.

8.7. Special Procedures for Sensitive Grievances

Certain grievances may require specialized handling procedures because of their sensitive nature, confidentiality requirements, potential safety risks, or legal implications. The Project will establish additional safeguards to ensure that such grievances are managed appropriately while respecting the rights, dignity, privacy, and safety of affected individuals. These procedures apply in addition to the standard grievance management process described in Section 8.6.

8.7.1. Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)

The Project recognizes that allegations of SEA, SH, GBV, violence against children, and related forms of abuse require specialized handling arrangements that differ from standard grievance procedures. SEA/SH-related grievances shall be managed through a survivor-centered approach based on the principles of:

- confidentiality;
- respect and dignity;
- safety and protection from retaliation;
- informed consent;
- non-discrimination; and
- access to appropriate support services.

SEA/SH grievances may be submitted through designated confidential reporting channels established by the Project. Such grievances will be handled only by appropriately trained personnel and will not be discussed in public forums or through standard community grievance committees.

The Project will not require survivors to provide evidence as a condition for receiving support or referral services. Where available and with the informed consent of the survivor, complaints may be referred to appropriate service providers, healthcare providers, psychosocial support services, protection agencies, or relevant authorities.

Information related to SEA/SH grievances will be recorded using anonymized and aggregated data only and will be subject to strict confidentiality requirements.

8.7.2. Confidential and High-Risk Grievances

Certain grievances may involve matters requiring enhanced confidentiality or protection measures, including:

- allegations of corruption, fraud, or misconduct;
- threats, intimidation, coercion, or retaliation;
- disputes involving vulnerable persons;
- allegations involving Project personnel or contractors;
- child protection concerns; and
- other sensitive matters requiring restricted access to information.

Such grievances may be managed through designated confidential channels and reviewed by authorized personnel only. Access to grievance records will be restricted to those directly involved in grievance assessment and resolution. Where appropriate, the Project may engage specialized experts, consultants, or relevant authorities to support investigation and resolution of sensitive grievances.

8.7.3. Vulnerable and Disadvantaged Groups

The Project recognizes that vulnerable and disadvantaged groups may face barriers in accessing grievance mechanisms or participating effectively in grievance resolution processes.

Where necessary, additional support measures may be provided, including:

- verbal submission of grievances;
- assistance in completing grievance forms;
- household visits;
- use of local languages;
- assistance from community representatives or support persons;
- accessible communication methods for persons with disabilities; and
- flexible consultation and grievance resolution arrangements.

The Project will seek to ensure that vulnerable and disadvantaged stakeholders are able to use the GRM on an equitable basis and without discrimination.

8.7.4. Indigenous Peoples and Traditional Communities

No Indigenous Peoples have currently been identified within the Project footprint based on environmental and social assessments undertaken to date. However, should Indigenous Peoples or communities meeting the requirements of AIIB ESS 3 be identified during Project implementation, the Project will establish culturally appropriate grievance management procedures that take into account traditional decision-making structures, customary institutions, and community preferences.

Such arrangements may include consultation with traditional leaders and integration of customary grievance resolution mechanisms where these are consistent with applicable laws and Project requirements.

8.7.5. Referral to External Mechanisms

Certain grievances may fall outside the mandate of the Project-level GRM or require action by competent government authorities, statutory bodies, law enforcement agencies, judicial institutions, or specialized service providers. In such cases, the Project will provide information to complainants regarding appropriate referral pathways and, where appropriate, facilitate coordination with relevant agencies while continuing to monitor the status of the grievance. Referral of a grievance to another mechanism does not preclude the Project from maintaining records of the grievance and monitoring actions taken to address the underlying concern.

Grievances requiring specialized handling will be managed in accordance with the principles described in Section 8.3 while ensuring appropriate confidentiality, protection measures, and access to support services. The monitoring, documentation, and reporting arrangements applicable to all grievances received through the Project GRM are described in Section 8.8.

8.8. Monitoring, Documentation and Reporting

8.8.1. Grievance Recording and Documentation

All grievances received through the Project-level GRM will be documented and maintained in a centralized Grievance Registry. The registry will be used to track the status of grievances from receipt through resolution and closure and will serve as the primary source of information for grievance monitoring and reporting. The Project will maintain appropriate records for all grievances received, including:

- grievance reference number;
- date of submission;
- complainant information (unless anonymous);
- location of the grievance;
- grievance category;
- responsible entity;
- actions taken;
- status of resolution;
- date of closure; and
- supporting documents and correspondence, where applicable.

The Project will maintain grievance records using formats consistent with the templates presented in **Attachment 3 (Sample Grievance Registration Form)** and **Attachment 4 (Sample Grievance Log/Register)**. Grievance records shall be securely maintained and access restricted where confidentiality requirements apply.

8.8.2. Grievance Monitoring

The PIU, with support from contractors, consultants, BPJN, and other responsible entities, will monitor implementation of the GRM throughout the Project lifecycle. Monitoring activities will include:

- tracking the number and types of grievances received;
- assessing grievance response and resolution timeframes;
- identifying recurring issues and trends;
- monitoring implementation of corrective actions;
- reviewing unresolved and escalated grievances;
- monitoring grievances submitted by vulnerable groups;
- monitoring SEA/SH and other sensitive grievances through appropriate confidential procedures; and
- assessing the overall effectiveness of the grievance mechanism.

Monitoring records related to stakeholder engagement activities, commitments, consultations, information disclosure events, and grievances may be maintained using the templates provided in **Attachments 3–5**. Monitoring results will be used to identify opportunities for improvement and strengthen Project stakeholder engagement and environmental and social management practices.

8.8.3. Grievance Performance Indicators

The Project will monitor GRM performance using quantitative and qualitative indicators.

Table 14. Indicative GRM Performance Indicators

Indicator	Frequency
Number of grievances received	Quarterly
Number of grievances resolved	Quarterly
Percentage of grievances resolved within established timeframes	Quarterly
Number of grievances pending resolution	Quarterly
Number of grievances escalated to higher GRM levels	Quarterly
Number of land acquisition-related grievances	Quarterly
Number of labor-related grievances referred through appropriate mechanisms	Quarterly
Number of grievances submitted by vulnerable groups	Quarterly
Number of SEA/SH or other sensitive grievances handled through confidential procedures*	Quarterly
Stakeholder satisfaction with grievance resolution process	Annually

* Reported only in aggregated and anonymized form.

8.8.4. Reporting

Information on grievance management performance will be incorporated into regular Project monitoring and reporting processes. GRM reporting may include:

- summary statistics on grievances received and resolved;
- analysis of grievance categories and trends;
- status of unresolved grievances;
- corrective measures implemented;
- recurring stakeholder concerns;
- lessons learned; and
- recommended improvements to Project management and stakeholder engagement activities.

Grievance information will be included, as appropriate, in:

- quarterly Project progress reports;
- environmental and social monitoring reports;
- land acquisition and resettlement monitoring reports;
- reports submitted to AIIB, IsDB, and other relevant authorities; and
- public disclosure materials where appropriate and consistent with confidentiality requirements.

Information contained in stakeholder engagement records, grievance registers, commitments registers, and disclosure records will form part of the evidence base used for Project monitoring and reporting.

8.8.5. Continuous Improvement

The Project will periodically review the effectiveness of the GRM based on monitoring results, stakeholder feedback, grievance trends, and lessons learned during implementation. Where necessary, improvements may be introduced to:

- grievance submission channels;
- grievance handling procedures;
- institutional arrangements;
- stakeholder awareness activities;
- confidentiality and protection measures;
- engagement of vulnerable groups; and
- monitoring and reporting systems.

Results of GRM reviews will be used to support periodic updates of the SEP and associated stakeholder engagement programs.

8.9. AIIB Project-affected People's Mechanism

8.9.1. Overview of the AIIB Project-affected People's Mechanism

In addition to the Project-level GRM, PAPs and communities who believe that they have been or are likely to be adversely affected by the Project may submit concerns to the AIIB through its Project-affected People's Mechanism (PPM). The PPM is an independent accountability mechanism established by AIIB to provide a process through which Project-affected people may raise concerns regarding the Bank's compliance with its ESF and ESSs. The PPM operates independently from the Project-level GRM and does not replace available administrative, judicial, customary, or Project-level grievance mechanisms.

8.9.2. Relationship between the Project GRM and the PPM

The Project-level GRM shall remain the primary mechanism for receiving and addressing grievances related to land acquisition, compensation, resettlement, livelihood restoration, environmental impacts, construction activities, community health and safety, stakeholder engagement, labor-related concerns, and other Project-related matters.

Project-affected persons and other stakeholders are encouraged to make good-faith efforts to seek resolution through the Project-level GRM in the first instance. However, access to the PPM is available at any time and does not preclude access to other available administrative, judicial, customary, or dispute resolution mechanisms. Access to the PPM does not require prior exhaustion of Project-level grievance procedures, although affected persons are encouraged to seek resolution through the Project GRM where feasible and appropriate.

Information regarding both the Project-level GRM and the PPM will be disclosed through Project consultations, stakeholder engagement activities, community meetings, PIBs, information boards, and other communication channels established under this SEP.

8.9.3. Access to Additional Information

Additional information regarding the PPM, including eligibility requirements, submission procedures, and contact information, is available on the AIIB website: <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism.html>

Stakeholders may access the PPM directly through the channels established by AIIB if they believe that Project-related environmental or social concerns have not been adequately addressed through available Project-level mechanisms or other appropriate avenues.

9. Monitoring, Disclosure and Reporting

9.1. Objectives

Monitoring and reporting are essential components of this SEP and will be undertaken throughout the Project lifecycle to assess the effectiveness of stakeholder engagement activities, information disclosure measures, grievance management arrangements, and stakeholder participation processes. Monitoring will help ensure that stakeholder engagement activities remain responsive to stakeholder needs, comply with Project commitments, and contribute to effective environmental and social management. The objectives of monitoring, disclosure, and reporting are to:

- assess implementation of the Stakeholder Engagement Program;
- evaluate the effectiveness of stakeholder engagement methods and communication channels;
- monitor stakeholder participation, including participation of vulnerable and disadvantaged groups;
- track stakeholder concerns, complaints, and grievances;
- identify opportunities for improving consultation and disclosure processes;
- assess stakeholder satisfaction with Project engagement activities; and
- support periodic review and updating of this SEP.

9.2. Monitoring Approach

Monitoring of stakeholder engagement activities will be undertaken by the PIU, with support from BPJN, contractors, supervision consultants, environmental and social specialists, and other relevant entities.

Monitoring activities may include:

- review of consultation records and attendance sheets;
- monitoring implementation of the Stakeholder Engagement Program;
- review of information disclosure activities;
- analysis of grievances and complaint trends;
- household visits and follow-up consultations;
- stakeholder feedback collection;
- stakeholder perception surveys, where appropriate; and
- periodic review of stakeholder analysis and engagement effectiveness.

The Project will maintain records of stakeholder engagement activities throughout implementation, including consultation materials, meeting minutes, attendance lists, grievance records, commitments registers, and monitoring reports.

9.3. Monitoring Indicators

The Project will monitor a range of quantitative and qualitative indicators to assess SEP implementation and effectiveness.

Table 15. Indicative Stakeholder Engagement Monitoring Indicators

Indicator	Means of Verification	Frequency
Number of stakeholder engagement activities conducted	Consultation records and meeting minutes	Quarterly
Number of participants engaged	Attendance sheets	Quarterly
Number and percentage of female participants	Attendance sheets	Quarterly
Number of vulnerable persons participating in consultations	Attendance sheets	Quarterly
Number of information disclosure activities conducted	Disclosure records	Quarterly
Number of Project Information Booklets and disclosure materials distributed	Distribution records	Quarterly
Number of grievances received	GRM database	Quarterly
Number of grievances resolved	GRM database	Quarterly

Indicator	Means of Verification	Frequency
Percentage of grievances resolved within established timelines	GRM records	Quarterly
Number of land acquisition and livelihood restoration consultations conducted	Consultation records	Quarterly
Number of household visits conducted	Field records	Quarterly
Stakeholder satisfaction and perception trends	Surveys, interviews, stakeholder feedback	Annually
SEP updates completed	SEP revision records	As required

9.4. Reporting

Stakeholder engagement outcomes and implementation progress will be documented and reported throughout the Project lifecycle. Reporting will seek to provide transparency regarding Project engagement activities, stakeholder concerns, grievance management performance, and actions taken in response to stakeholder feedback. Project reporting may include:

- stakeholder engagement activities undertaken;
- key issues raised by stakeholders;
- follow-up actions and commitments;
- status of grievance management;
- participation of vulnerable groups;
- effectiveness of information disclosure activities;
- monitoring results and lessons learned; and
- recommendations for improving stakeholder engagement performance.

Stakeholder engagement information will be incorporated into regular environmental and social monitoring reports prepared by the Project.

9.5. Information Disclosure of Monitoring Results

The Project will disclose relevant information regarding implementation of stakeholder engagement activities, environmental and social performance, grievance management, and monitoring results in a manner appropriate to different stakeholder groups. Information may be disclosed through:

- community and village meetings;
- stakeholder consultation events;
- public information boards;
- Project Information Booklets;
- Project websites or digital platforms, where available;
- periodic monitoring reports; and
- other communication channels described in this SEP.

Summaries of monitoring results will be prepared in a format that is understandable and accessible to stakeholders.

9.6. Review and Updating of the SEP

This SEP is a living document and will be reviewed periodically throughout Project implementation. Monitoring findings, stakeholder feedback, consultation outcomes, grievance trends, Project changes, and lessons learned will be used to determine whether updates to the SEP are necessary. The SEP shall be reviewed at least annually and updated as required to:

- reflect changes in Project design or implementation arrangements;
- incorporate new stakeholder groups or emerging stakeholder issues;
- strengthen engagement approaches and disclosure measures;
- improve participation of vulnerable and disadvantaged groups;
- address recurring grievances or stakeholder concerns; and
- maintain consistency with Project environmental and social commitments.

Where material changes are introduced, the updated SEP will be disclosed in accordance with the information disclosure procedures described in this document.

ATTACHMENTS

Attachment 1. Summary Record of Stakeholder Engagement Activities

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
5 October 2020	Mass Media Announcement	Riau Pos	Riau	The announcement of the AMDAL preparation plan and activity plans was published in the Jambi Independent daily newspaper on Monday 5 October 2020 and the Riau Pos daily newspaper on Monday 5 October 2020	Media Campaign/Newsletter
25 October 2020	Public Consultation in District Muaro Jambi and District Batanghari.		District Muaro Jambi, Jambi	1. So that PT. Before carrying out survey activities, Hutama Karya must first carry out coordination and consultation with the local village government. 2. So that in the inventory data of PT. Hutama Karya should involve officers from the Villages whose locations are being traversed with the approval of the Village Head concerned. 3. In the land compensation process, an inventory of land ownership must first be carried out involving the local government. 4. During the Toll Road Works, how will community road access be disrupted by the activities of this Toll Road Project? 5. To inform the Village Head of the location of the toll road crossing to the Village Government 6. The impact of erosion and landslides due to toll road work so that the road disrupts the condition of the surrounding area. 7. When the toll road has been completed, of course the access road will be for the community whose land is divided into two as a result of this project. What is the solution if people are prohibited from crossing the toll road? 8. To explain the starting point (zero) for this toll road project for Pijoan Village.	Public Consultation

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				9. So that Hutama Karya collaborates with community leaders 10. So that when installing stakes, BPN parties are involved, especially those on community land. 11. What if the toll road route is on palm oil plantation land that is still productive, what about the compensation, while we live off the palm oil? 12. How is compensation calculated if it is on productive oil palm plantation land? 13. Previously the length of the toll road was 116.00 Km, now it has increased to 198.13 Km. Please explain which area the increase in length is in District Muaro Jambi or District Batanghari. 14. Land acquisition prices must be conveyed transparently to the public 15. When acquiring land, distinguish between productive land and unproductive land, so that there is no unrest in the community 16. After development, what impact will it have on the economic activities of the community along the Batanghari river, including the community's agricultural land? 17. The community agrees to the construction of the toll road, how do they anticipate compensation? Land acquisition must be clear. 18. So that the initiator pays attention to the social impacts in the community, especially those directly affected 19. So that the proponent in implementing toll road projects does not change the shape of natural landscapes such as rivers, lakes, etc. 20. In principle, the community agrees, but what about the selling value of community land, if the toll road passes	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				through, its economic value will be reduced because it cannot be passed? 21. So that land acquisition must first be held at a meeting or socialization in each village 22. When determining the location survey, officers from the Village and Village Government should be involved 23. If there is a rest area in our area, we should be given priority in opening a business in that location, especially for people whose land has been affected by land acquisition and has resulted in a reduction in the sale value of our land. 24. During construction activities, the main party in the mobilization of equipment and materials must pay attention to road access and coordinate with the local government. 25. In determining toll route routes, local wisdom must be taken into account 26. In the area of Bukit Baling Village and Suko Awin Jaya Village, Subdistrict Sekernan, there is a Production Forest Area, for this reason, if the toll road route passes through this area, you must apply for a Production Forest Use Permit from the Ministry of Environment and Forestry.	
26 October 2020	Public Consultation in District Tanjung Jabung Barat, Riau		District Tanjung Jabung Barat, Riau	1. The main issues of concern to the initiator and drafting consultants are: a. Land acquisition b. Flood mitigation c. Recruitment of local workers d. Access protected wildlife	Public Consultation

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				e. Construction of a pedestrian bridge f. Strengthening the community economy (UMKM) g. Waste management. 2. There is direct involvement of local workers who can be employed in the development process. 3. The issue of appropriate compensation for land acquisition at a price that does not mutually harm the communities whose land is affected by toll road construction 4. Certainty about the shape of the toll road that will be built so that it does not disrupt community traffic activities, both in harvesting garden products and in carrying out daily public activities. 5. Community anxiety if the construction of the toll road has an impact on the road's waterways, thereby causing flooding prone areas in several locations on the planned road to be built. 6. In principle, the community agrees to the plan to build a 198.13 km long Jambi-Rengat toll road, provided that 7. Community representatives who will sit as members of the AMDAL assessment commission consist of sub-district and village parties (Village Heads, community leaders and affected communities) as in the attached list 8. Minutes and Minutes of Public Consultation are an inseparable unit	
18 November 2020	Public Consultation in District Indragiri Hulu		District Indragiri Hulu, Riau	1. Paya Rumbai Village and Talang Jerinjing Village are swamp areas so special attention is needed to handle toll road construction. 2. The toll road construction concerns the Talang Mamak cemetery in Talang Jerinjing Village but the people of	Public Consultation

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				Talang Mamak Village object to the cemetery being moved. - With many plantations growing, it is hoped that the construction of this toll road will continue to improve the welfare of the surrounding community. - The land certificate exists but the land still has HPK status, so an AMDAL study needs to be carried out so as not to harm the community - The villages affected by this development are community settlements, so what about the houses affected by the development, so that there are other alternatives for building toll roads so that settlements are not split in two? - How to replace/compensate houses/gardens affected by toll road construction? It is hoped that it will not harm the affected communities 150 Ha is community land that still has HPK status, so according to existing information, HPK land is not compensated, only replaced by growth. 5 to 7 points are the burial locations of the Talang Mamak tribe who refused to be moved - There are still several lands where the toll road passes and there are still conflicts over land ownership. - It is proposed that a rest area be built next to the mosque because the land will be sold - It is not yet known who owns the land where the toll road construction will pass - Will those who do not have a certificate still be compensated? - Will certificates that are not in the owner's name still be compensated? - During the construction of the PKU – Dumai toll road, the AMDAL team was different from the compensation team	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				which was usually chaired by the Regional Secretary as Chair of the Regency/District TKPRD and the Provincial Team as coordinator. Land compensation will be carried out by the PUPR Ministry. Usually compensation will benefit the community because the team will collect data and evaluate the community's land according to the value of the land. 15. Usually the problem is over passes and under passes, where there will be a cut in the village where the village head and sub-district head will sign an agreement for the village that is cut, but later there will be problems with the road being closed because it has been cut by the toll road for one of the villages that is cut. 16. If later there is a problem with land compensation, an application can be made to the Provincial TKPRD 17. A careful inventory needs to be carried out so that no villages or sub-districts are missed. 18. It is recommended that the Talang Mamak Tomb that will be passed be made an icon so that no relocation is required 19. Paya Rumbai Village is crossed by a 12 km toll road, the entire Paya Rumbai Village is included in the HPK, so it is necessary to consider not only compensation for growing plants because some of the community's palm oil trees are 25 years old. 20. Please pay attention to the rights of the community, such as the community production road which has been marked and a road has also been made under the Cenaku River bridge so that people can pass through. 21. The community expects compensation for the profits they will get. 22. All land that has a certificate or SKGR and others must have the same return value	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
19 November	Public Consultation in District Indragiri Hulu		District Indragiri Hulu, Riau	1. The problem is that community land which still has HPK status is expected to belong to the community because the community has lived there for hundreds of years and has been recognized by the local government and already has a RTRW, but when checked by the BPN it is still in the red zone. 2. What is the format for a request to change the status of community land so that it no longer becomes HPK? 3. Limau Manis Village is crossed by the Tembilahan Province road to Jambi. The community hopes that toll facilities such as entry or exit points and rest areas will be in Limau Manis Village 4. This socialization should be attended by BPN and the District Forestry Service in discussing land acquisition so that the public is not confused 5. The key to toll road implementation is an AMDAL study so that it is hoped that it can minimize the impact of development 6. The community welcomed the construction of the Jambi-Rengat toll road 7. Concern in the Kemuning and Keritang sub-districts, areas prone to flooding, the construction of toll roads could cut off water flow. Can consult with the village head. It is hoped that water will continue to flow smoothly in the villages of these 2 sub-districts 8. Compensation is expected not only for plants 9. Please help the community to find a solution for the HPK land to become community property 10. In discussing land acquisition, the community always does not get clarity regarding compensation 11. The workforce, especially laborers and unskilled laborers, come from local villages that are crossed by a	Public Consultation

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				toll road and pass through one gate so there is no confusion. 12. Procurement of logistics and materials also comes from local communities who pass through the toll road 13. District problems. There are 3 villages in Kemuning, namely the village of Timun District. Kemuning Muda, Lubuk Besar village, district. Kemuning, and Kayu Raja Village, Kec. Keritang. In particular, the issuance of the SK 378 of 2008 permit, which as mentioned in the stages above, is not appropriate, the community members have been in Lubes village for 80 years and today there are no forests in all their gardens. In this community garden, a permit was issued in 2008 on October 28. The issued permit states that if there are village or tegal rice fields or land that has been legally managed by a third party according to local customary law, it is not included in the PT permit. Sari Hijau Mutiara, if it is issued, why is no one able to remove or liberate it from the forest area, perhaps with the entry of the toll road in the Kemuning area, perhaps there are 2 moments, namely the district DLHK can explain the issue of community land status so as not to cause unrest when compensating community land . 14. Environmental impacts when mobilizing materials that pass through community roads, if they are damaged, please repair them 15. The construction of the toll road passes through 2 provinces so it will be discussed at the central Ministry of Environment in Jakarta 16. Involve the community in monitoring toll road construction	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
22 November 2023	Focused Group Discussion Stakeholder Engagement	Village Government and Affected Residents Number of Participants: 15 People	Subdistrict Rengat Barat, Indragiri Hulu, Riau	1. It is best for all residents who are directly affected by the project - their land is affected by construction work or indirectly. 2. Information should be provided through meeting forums involving at least the affected residents. Discussion participants did not agree with the written notification and hoped that the next meeting would discuss the schedule and value of land replacement. 3. Information regarding land replacement (in the form of disbursement schedule and value) should be provided immediately. Meanwhile, project work information is provided before the project is carried out. 4. "Most of" (said several times by discussion participants) the land in West Rengat sub-district is APK land and does not have certificates (including SP, SKGR). 5. Currently, after the penlok in 2020, a lot of land is abandoned but has not received land replacement. 6. In Talang Jerinjing Village, there is the Talang Mamak tribe and they have a burial area for their ancestors near the toll road. Expect attention from the project to be respectful and that the work will not cause dirt or damage in the area. 7. Talang Mamak Village residents also hope that the process of determining land replacement value will be carried out in a transparent manner known to all parties and that there will be no attempts to manipulate the residents' ignorance so that they are "lied to". 8. Currently complaints are made by submitting them to village officials or the Village Head, but the Village Head does not yet know how to proceed with the complaint. So far, complaints have been more about the lack of clarity regarding the land replacement schedule.	Focused Group Discussion

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				9. It is hoped that project implementers can involve local residents in toll road construction work. Communities around the project hope that local MSMEs will fill the rest area, not entrepreneurs from far away. 10. Programs that need to be implemented are related to land replacement and after completion of construction work (operational phase) 11. To prepare human resources who are able to meet standards when involved/employed in project work or during toll road operations, it is necessary to carry out training to increase the capacity of local human resources 12. In this discussion there was strong pressure from the participants to provide information as soon as possible regarding the replacement value of the land; land replacement schedule as well as information regarding the mechanisms that must be carried out for the land replacement process. Including information on what compensation will be obtained related to the existence of different land statuses among residents.	
22 November 2023	Focused Group Discussion Stakeholder Engagement	Village Government and Affected Residents Number of Participants: 8 people	Subdistrict Seberida, District Indragiri Hulu, Riau	1. Information should be provided to all village residents through meeting forums involving all parties who can answer residents' questions. So many questions for quite a long time have given rise to suspicions, rumors and can disturb the residents of Paya Rumbai Village. 2. Providing information must be through a well-planned community meeting forum, containing complete explanations from all authorized parties and not prepared suddenly. 3. Before work is carried out, information regarding land replacement (in the form of disbursement schedule and	Focused Group Discussion

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				value) should be socialized and completed to prevent anger from affected residents. 4. "Most" (said several times by discussion participants) of the land in Paya Rumbai Village is APK land and does not have certificates (including SP, SKGR). 5. Currently, after the penlok in 2020, a lot of land is abandoned but has not received land replacement 6. Land replacement must be socialized, both the calculated value and the disbursement schedule as well as the conditions that must be met before construction work begins. 7. Currently complaints are made by submitting them to village officials or the Village Head, but the Village Head does not yet know how to proceed with the complaint. So far, complaints have been more about the lack of clarity regarding the land replacement schedule. 8. Because the complaint mechanism is not yet operational, activities like this where face-to-face meetings between affected residents and the project parties should also be an opportunity to receive complaints and in the meeting can answer questions. 9. It is hoped that project implementers can involve local residents in toll road construction work. 10. As a form of consultation, residents expressed concerns about flooding when the toll road was completed, because there was water flowing into the river which would be cut off by the toll road. 11. The river also has a function as transportation, so there must be access to the river that can be passed by vehicles transporting palm oil. And it must be passable before construction work is carried out. Apart from that, this access is really needed by residents who work as fishermen and need access to the river.	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				12. Programs that need to be implemented are related to land replacement and after completion of construction work (operational phase) 13. To prepare human resources capable of meeting current standards 14. involved/employed in project work or during toll road operations, it is necessary to carry out training to increase the capacity of local human resources. 15. The implementation of gathering residents like this clearly disrupts the economic activities of residents, so it would be better for activities like this to be a meeting that can answer all questions regarding the unclear land replacement schedule. 16. There are many concerns from residents affected by the project, such as inappropriate replacement values and clarity about what can be replaced, regarding land with its various statuses and the types of plants on it. 17. There must be compensation for the failure to maintain oil palm trees while waiting for thawing	
23 November 2023	Focused Group Discussion Stakeholder Engagement	Village Government and Affected Residents Number of Participants: 5 people	Subdistrict Keritang, District Indragiri Hilir, Riau	1. Information should be provided to all village residents through meeting forums that involve all residents because so far only affected residents have been involved. 2. Providing information must be through a well-planned community meeting forum, containing complete explanations from all authorized parties and not prepared suddenly. 3. Before work is carried out, information regarding land replacement (in the form of disbursement schedule and value) should be socialized and finalized to prevent anger among affected residents.	Focused Group Discussion

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				4. Providing information to all village residents can be done by participating in the activities of village institutions such as: a. Yasin group for fathers every Thursday evening and mothers every Friday afternoon b. Farmer groups (Akasindo, Tunas Karya Mandiri, etc.) c. Labour Union d. PSHT Pencak Silat Association e. Riau Malay Traditional Institute 5. The majority of land in Keritang sub-district is APK land and does not have a certificate (including SP, SKGR). 6. After the blockade in 2020, and the presence of notice boards on the affected residents' land containing threats not to enter and carry out any activities in it resulted in residents not being able to care for the plants, especially expensive maintenance that was definitely avoided because the plants could not be harvested, but this will cause the plant to die 7. The delay in replacing the land after the land was fenced with barbed wire and installed with announcement signs caused unrest among residents affected by the project. 8. The mechanism for submitting complaints seems to have been interrupted after submitting it to village officials and the Village Head. 9. Efforts were made to send a letter to the provincial BPN through known officials, but did not receive a response because they had changed assignments. Sent an email to PUPR Province, to the email address listed on the letterhead of the Trans Sumatra Toll Road work unit, namely: pkup2rgt@gmail.com on November 5 2023. Have not received a response.	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				10. It is hoped that project implementers can involve local residents in toll road construction work. 11. As a form of consultation, residents expressed concerns about pollution caused by construction work. 12. Construction of access that connects existing roads but is cut off by toll roads must be completed before toll road work begins, because it has the potential to disrupt residents' businesses in transporting their crops. 13. Programs that need to be implemented are related to land replacement and after completion of construction work (operational phase) 14. Facilitate MSMEs in Petalongan Village to be able to get quota in the rest area of the Trans Sumatra toll road 15. The implementation of gathering residents like this clearly disrupts the economic activities of residents, so it would be better for activities like this to be a meeting that can answer all questions regarding the unclear schedule for land replacement. 16. There are many concerns from residents affected by the project, such as inappropriate replacement values and clarity about what can be replaced, regarding land with its various statuses and the types of plants on it. 17. There must be compensation for the failure to maintain oil palm trees while waiting for thawing	
23 November 2023	Focused Group Discussion Stakeholder Engagement	Village Government and Affected Residents Number of Participants: 17 people	Subdistrict Kemuning, District Indragiri Hilir, Riau	1. Providing information must be through a well-planned community meeting forum, containing complete explanations from all authorized parties and not prepared suddenly. 2. Information should be provided to all village residents through meeting forums that involve all residents because so far only affected residents have been involved.	Focused Group Discussion

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				3. Currently residents in the four villages are at the point of getting bored attending meetings held by the project, but not a single meeting has been able to provide clarity on a clear schedule for preparation and implementation. Including the land replacement disbursement schedule. 4. This discussion activity was also criticized because data had been collected several times but no party had ever been able to answer questions regarding compensation for different land statuses, clear land replacement values and other things that project affected residents should know. 5. The majority of land in Kemuning sub-district is APK land and does not have a certificate (including SP, SKGR). 6. Regarding this matter, the sub-district head, who was also present and monitoring the discussion, said that the government was carrying out the process of releasing land in the area where the Trans Sumatra toll road passes to the discussion participants. 7. After 2 years since the measurements there was no more information and residents no longer looked after their land because maintenance costs were expensive. However, it turns out that after 2 years there is still no clarity 8. The complaint submission mechanism seems to have been interrupted after it was carried out by conveying it to village officials and the Village Head and conveying it to the sub-district level 9. The village heads hope that they will be given a complaint service route so that this process is not difficult and long-winded, the progress of which cannot be monitored, thus disrupting the Village Head's routine duties.	

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				10. Above all the suggestions, residents of Kemuning sub-district hope that there will be an entrance gate in Kemuning sub-district because to enter via Seberida sub-district the distance is too far, around 30 km, so to get to Jambi, Kemuning residents will definitely choose not to use the toll road because the gate is far and the direction is far away. 11. The news that there are still land owners who have not been paid in the toll road project, even after the toll road is operational, is the basis for the discussion participants to require this project to complete the entire land replacement process before construction work is carried out. 12. Programs that need to be implemented are related to land replacement and after completion of construction work (operational phase) 13. It is hoped that project implementers can involve local residents in toll road construction work. 14. And we hope that there will be training prepared so that local residents can compete to get jobs in the project. 15. The Village Head must be made part of the project so that he can empower his citizens and the resources found around the project. 16. Asking PT Blantickindo Aneka to convey to all related parties that the existence of a project plan that has taken measurements and has caused residents' land to be unproductive has had a negative impact and caused unrest among residents who initially lived peacefully before this project.	
TBC	Socio Economic and IOL Cencuss	562 Affected Household	TBC	Basic Information on Household Socio-Economic Conditions 1. Household Demographics 2. Living Conditions and Household Income	Household Interview

Date	Activities	Participants	Location	Discussion summary	Methods of Engagement
				3. Access to Sanitation, Energy, and Basic Living Facilities 4. Perceptions of Impact Mitigation Programs 5. Perceptions of the Project and Consultation Information and Measurement of Project-Induced Losses 1. Ownership of Productive Assets for Affected Households 2. Utilization and Usage of Productive Assets for Affected Households 3. Compensation and Relocation Options	

Attachment 2. Sample Stakeholder Engagement Program for Implementation Planning

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
Information Disclosure	Information regarding the Jambi-Rengat Toll Road Development Project along with potential positive and negative impacts that may arise, especially related to land acquisition, resettlement and livelihood loss.	- Information Dissemination: Efforts to enhance the knowledge and awareness of key stakeholders (including Affected Residents) and Local Government regarding the Project. - Receiving input and feedback that are concerns from stakeholders.	- The Project Proponent will hold formal meetings in the form of a "Public Consultation" at a location within the Project implementation area. - The Public Consultation will provide detailed information regarding the Jambi-Rengat Toll Road Development Project (Project Overview; Project Location Map; Implementation Stages and Timelines) as well as various potential impacts (positive-negative) that may arise. - Presentations will utilize multimedia and document printing. - All inputs and recommendations from participants will be recorded in minutes and will be presented in the SEP Monitoring Report.	- Regional Government (Provincial and Regencies) - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous People's	Pre-Construction: Before the Land Acquisition Process Begins
	Presentation of Environmental & Social Project Documents for the Jambi-Rengat Toll Road Development:	- Information Disclosure regarding Environmental and Social Project Documents - Enhancing Stakeholders' Knowledge and Awareness regarding the existence of	The Project Initiator presents information regarding the availability of Environmental and Social Documents uploaded on the Project Initiator's Official Website.	- Regional Government (Provincial and Regencies) - Local Authorities (Village Chiefs) - Affected Residents	Pre-Construction and Construction. After Finalization of

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
	- Environmental and Social Impact Assessment (ESIA) - Draft and Final Land Acquisition and Resettlement Plan (LARP) & and Livelihood Restoration Plan (LRP) - Socio-Economic Baseline - Gender Action Plan - Indigenous Peoples Plan (IP Plan)	Environmental and Social Documents.	- Printing Environmental and Social Documents (in Indonesian) and providing them at each affected Village Office. - Holding Meeting Sessions to socialize the availability and access methods of the Project's Environmental and Social Documents.	- Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous People's	Environmental and Social Documents by the Project Proponent and AIIB
	Dissemination of Information Regarding the Availability of the Grievance Mechanism for the Jambi-Rengat Toll Road Development Project	Socialization process to stakeholders (including Affected Residents) regarding the availability of Grievance Mechanism Handling Procedures.	- The Project Proponent disseminates the availability of the finalized Grievance Redress Mechanism to all affected areas. - Grievance flow is created in Indonesian language understandable by all stakeholders. - Posting notices of Grievance Flow and Grievance Facilities (e.g., Grievance House) on notice boards placed at several points around the project-affected areas	- Local Government (Village Chiefs) - Affected Project Residents (APR) - Indigenous Communities - Contractor (Company)	Pre-Construction and Construction
	Updating Progress and Status Project	Providing current information regarding the progress of the project from pre-construction to operation.	The Project Initiator publishes progress information of the project implementation in the form	Regional Government (Provincial and Regencies)	Pre-Construction

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
			of progress reports disseminated to stakeholders through formal meetings. - Progress information of the project implementation is also published on the Project Initiator's official website, as well as through digital Communication Forums established with various stakeholders. - Progress information of the project implementation is also disseminated through information boards installed at several points around the project-affected areas.	- Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor (Company)	and Construction
	Environmental and Social Monitoring"	Providing current information regarding the results of environmental and social monitoring from the project.	- The Project Proponent publishes information from the results of environmental and social monitoring in the form of reports accessible to stakeholders. - Summaries of the environmental and social monitoring reports are communicated through the Village Government. - Summaries of the results of environmental and social monitoring are also	- Local Government - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor (Company)	Pre-Construction, Construction and Operation

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
			published through information boards installed at several points around the project-affected areas.		
Consultation and Stakeholder Engagement	Sustainable Environmental Management and Impact Mitigation Program for the Project	- Discussing the plans and implementation of the environmental management and impact mitigation program for the Jambi-Rengat Toll Road Development Project. - Receiving technical advice, input, and recommendations that need to be addressed and fulfilled by the project initiator regarding environmental management and project impact mitigation based on policies.	- The Project Proponent conducts formal meetings (audiences) that technically take the form of two-way discussions with stakeholders. - All inputs and recommendations from participants will be recorded in minutes and presented in the SEP Monitoring Report.	Directorate General of Pollution Control and Environmental Damage Control, Ministry of Environment and Forestry of the Republic of Indonesia	Pre-Construction and Construction
	Land Acquisition Program for the Jambi-Rengat Toll Road Development Project	- Discussing the implementation of land acquisition activities for the Jambi-Rengat Toll Road Development Project. - Obtaining technical advice and recommendations related to the implementation of all stages of land acquisition in accordance with policies.	- The Project Initiator conducts formal meetings (audiences) that technically take the form of two-way discussions with stakeholders. - All inputs and recommendations from participants will be recorded in minutes and presented in the SEP Monitoring Report.	National Land Agency, Jambi and Riau Provinces.	Pre-Construction
	Synchronization of Community Development and Empowerment Programs (PPM) with	Discussing the alignment of impact mitigation programs from projects through Community Development and Empowerment (PPM) with the Regional Medium-Term Development Plan	The Project Initiators hold formal meetings (audiences) structured technically as two-way discussions with Stakeholders.	- Provincial Government - Jambi - Riau - Regencies Government - Muaro Jambi - Batanghari	Pre-Construction, Construction and Operation

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
	Provincial and District RPJMD-RPJPD	(RPJMD) and Regional Spatial Plan (RPJPD) of the Local Government (Province and District). - Obtaining PPM programs for communities around the project (including Project-Affected Persons) that are in line with the policies of the Local Government (Province-District).	All inputs and recommendations from participants will be documented in the Minutes and presented in the SEP Monitoring Report.	- Tanjung Barat - Indragiri Hilir - Indragiri Hulu	
	Environmental and Social Impact Management Program and Complaints Handling Mechanism	- Discussing environmental-social impact management programs in affected village areas. - Establishing partnerships with Village Governments in implementing environmental-social impact management programs. - Building partnerships with Village Governments in the process of handling complaints from the community related to the project. - Obtaining technical input and recommendations from Village Governments regarding the implementation of environmental-social impact management programs and complaint handling mechanisms in affected village areas.	- The Project Initiators conduct formal meetings (audiences) structured technically as two-way discussions with Stakeholders. - Establishing a Communication Forum between project initiators, contractors, and Village Governments. - All inputs and recommendations from participants will be documented in the Minutes and presented in the SEP Monitoring Report.	The Village Chief around the Project Site	Pre-Construction, Construction and Operation
	Mechanism for Land Acquisition Resettlement and Complaints Handling	- Discussing the mechanism for implementing land acquisition and resettlement. - Ensuring that the implemented mechanism complies with applicable policies and considers	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from	People Affected Projects land acquisition and resettlement activity.	Pre-Construction and Construction

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
		- the social conditions of the affected communities. - Obtaining technical input and recommendations from Project-Affected Persons regarding the implementation of land acquisition and resettlement.	participant will be documented on Minutes and will be presented in the SEP Monitoring Report		
	Livelihood Restoration Programme	- Discussing Livelihood Restoration Programme implementation plan for people affected project land acquisition activity. - Obtaining technical input and recommendations from Project-Affected Persons regarding the implementation of land acquisition and resettlement.	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report	People Affected Projects land acquisition and resettlement activity.	Pre-Construction and Construction
	Job Opportunity	- Discussing benefits and opportunities from Project Jambi-Rengat Toll Road Development - Obtaining input and recommendation about job opportunities and employment mechanism.	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report	- Local Government - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor (Company)	Pre-Construction and Construction
	Community Development and Empowerment Programme for Community Near Project	- Discussing implementation plan of community development and empowerment programme for community near project - Obtaining inputs and recommendation about potential programme that suit with	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be	- Local Government Leader - Community Near Project	Pre-Construction and Construction

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
		livelihood characteristic community near project.	documented on Minutes and will be presented in the SEP Monitoring Report.		
	Open access and information on inclusive programs for vulnerable groups	- Discussing implementation plan of Inclusive Programme for Vulnerable Groups. - Obtaining inputs and recommendation about potential programme that suit with livelihood characteristic community near project.	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report.	- Women (including: women who are heads of households, women in low-income households, and women who do not own land) - Elderly - Children and Adolescents - Poor Households - Persons with disabilities - Squatters/Households without land ownership - Indigenous Communities (Indigenous Peoples)	Pre-Construction and Construction
	Sustainable consultation for collaborating on development and implementing mitigation of the impact from project	- Promoting collaboration on development and implementation mitigati - Mempromosikan kolaborasi dalam pembangunan dan implementing mitigation of the impact from project.	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report.	- Local Government - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor	Pre-Construction, Construction and Operation
	Gender Consultation and Engagement Plan	Increased inclusive participation in planning, implementation, and	Project Proponent conducting Focus Group	Women (include: women-headed households, women in	Pre-Construction,

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
		benefits of the Jambi - Rengat toll road project. - Increased accessibility of women in the toll road project - Women's access to socio-economic opportunities increases - Role Equality	Discussion with Stakeholders All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report.	low-income households, landless women and youths)	Construction and Operation
	Indigenous Peoples Consultation and Engagement Plan	- Increased inclusive participation in planning, implementation, and benefits of the Jambi - Rengat toll road project. - Increased accessibility of indigenous peoples in the toll road project - IP's access to socio-economic opportunities increases	- Project Proponent conducting Focus Group Discussion with Stakeholders - All inputs and recommendation from participant will be documented on Minutes and will be presented in the SEP Monitoring Report.	Indigenous People's	Pre-Construction and Construction
Monitoring and Evaluation	Stakeholder Surveys Perception	- To obtain relevant opinions from Stakeholders and their attention to the Project since the commencement of activities at the Project site. - To refresh the memory of the local Community regarding information about Complaints Handling from the Project and provide explanations for any misunderstandings (if necessary). - To study the diversity of perspectives from Stakeholders regarding the social performance of the Project, specifically in this survey.	- Conducting surveys of all Stakeholders, including Local Government, Local Communities, Affected Project Residents (WTP), and Vulnerable Groups. - The questionnaire content also includes information regarding perceptions of the benefits and impacts of project implementation at each phase, suggestions and feedback, depending on the situation, timeline, and objectives of the Project implementation.	- Local Government - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor	Construction and Operation

Activity	Topic	Objective and Purpose Engagement	Method	Parties Involved	Timeframe
		The survey results are presented as a source of information to review social management plans in the future period.			
	Stakeholder (update) Analysis	- To obtain the current status of Stakeholders' positions in the Influence and Interest Matrix. - To evaluate the Engagement Strategies that have been implemented with various Stakeholders. - To revise the Stakeholder Engagement Strategy for the upcoming period.	- Conducting surveys of all Stakeholders, including Local Government, Local Communities, Affected Project Residents (WTP), and Vulnerable Groups. - The questionnaire content also includes information regarding indicators of influence and interest of Stakeholders in the Project.	- Local Government - Local Authorities (Village Chiefs) - Affected Residents - Communities Near the Project - Non-Governmental Organizations (NGOs) - Vulnerable Groups - Indigenous Communities - Contractor	Construction and Operation

Attachment 3. Sample Grievance Registration Form

PROJECT GRIEVANCE REGISTRATION FORM

Grievance Reference Number: _____

Date Received: ____ / ____ / ____

Receiving Officer / Focal Point: _____

A. Complainant Information

Information	Details
Name (optional)	
Organization (if applicable)	
Village/Subdistrict	
Address	
Telephone/WhatsApp	
Email	
Preferred Communication Method	☐ Phone ☐ WhatsApp ☐ Email ☐ Letter ☐ In-person
Anonymous Submission	☐ Yes ☐ No

B. Grievance Details

Date Incident Occurred (if applicable): _____

Location of Issue: _____

Category of Grievance (tick all that apply)

- ☐ Land Acquisition and Compensation
- ☐ Livelihood Restoration
- ☐ Environmental Impacts
- ☐ Noise / Dust / Vibration
- ☐ Traffic and Community Safety
- ☐ Access Restrictions
- ☐ Construction Activities
- ☐ Employment and Local Opportunities
- ☐ Labor and Working Conditions
- ☐ Stakeholder Engagement / Information Disclosure
- ☐ SEA/SH or Other Sensitive Matter
- ☐ Other: _____

C. Description of Grievance

Please describe the concern, complaint, or issue:

D. Desired Resolution

What outcome would you like to see?

E. Supporting Documents

- ☐ Photographs

- ☐ Maps
- ☐ Letters
- ☐ Other Documents
- ☐ None

F. Consent

I confirm that the information provided above is accurate to the best of my knowledge.

Name/Signature (if applicable): _____

Date: ____ / ____ / ____

Attachment 4. Sample Grievance Log / Register

Project Grievance Register

Ref. No.	Date Received	Name	Complainant (or Anonymous)	Location	Category	Responsible Entity	Status	Date Closed
GR M-001	05/08/2026		Anonymous	Pijoan Village	Dust and Noise	Contractor	Closed	15/08/2026
GR M-002	10/08/2026		PAP Household	Selat Village	Compensation	PIU / LAIT	Under Review	-

Detailed Tracking Sheet

Ref. No.	Description	Date Acknowledged	Action Taken	Escalation Level	Resolution Outcome	Closure Date
				Level 1 / 2 / 3		

Suggested Status Categories

- Received
- Registered
- Under Review
- Investigation Ongoing
- Awaiting Action
- Resolved
- Closed
- Referred
- Withdrawn

Attachment 5. Stakeholder Engagement Templates

Template 1. Stakeholder Engagement Activity Record

Consultation / Meeting Record

Item	Information
Activity Title	
Date	
Time	
Location	
Project Phase	☐ Pre-Construction ☐ Construction ☐ Operation
Facilitator	
Organizing Entity	
Stakeholder Group	
Number of Participants	
Female Participants	
Vulnerable Participants	

Purpose of Engagement

Key Topics Discussed

1. _____
2. _____
3. _____

Key Issues Raised

No.	Issue Raised	Stakeholder
1		
2		
3		

Agreed Follow-up Actions

No.	Action	Responsible Party	Timeline
1			
2			

Prepared by: _____

Date: _____

Template 2. Stakeholder Attendance Sheet

Attendance Register

No.	Name	Organization / Community	Contact Number (Optional)	Signature
1				
2				
3				

Participant Summary

Category	Number
Total Participants	
Women	
Vulnerable Groups	
PAPs	
Government Representatives	
NGOs / CSOs	

Others	
--------	--

Template 3. Stakeholder Issues and Commitments Register

No.	Date	Stakeholder Group	Issue Raised	Project Response	Responsible Entity	Status
1						
2						

Suggested Status

- Open
- Under Review
- Action Ongoing
- Completed
- Closed

Template 4. Information Disclosure Record

Date	Document / Information Disclosed	Stakeholder Group	Disclosure Method	Location	Responsible Entity

These four annexes are typically sufficient for an AIIB-style SEP and are practical for implementation, monitoring, and audit purposes. They also align well with the revised Sections 6 (Stakeholder Engagement Program), 8 (GRM), and 9 (Monitoring, Disclosure and Reporting).