

**STAKEHOLDER ENGAGEMENT PLAN FOR KANDY MULTIMODAL
TRANSPORT TERMINAL DEVELOPMENT PROJECT**

Prepared by

Kandy Multimodal Transport Terminal Development Project

MINISTRY OF HIGHWAYS

Abbreviations

AP	Affected Person
CPPTSA	Central Province Passenger Transport Services Authority
CSM	Chief Station Master
DS	Divisional Secretary
EAC	Entitlement Assessment Committee
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
FGD	Focus Group Discussion
GOSL	Government of Sri Lanka
GN	Grama Niladhari
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GSBS	Good Shed Bus Stand
IGP	Independent Grievance Panel
KMC	Kandy Municipal Council
KMTT	Kandy Multimodal Transport Terminal
LGRC	Local Grievance Redress Committee
LMP	Labor Management Procedures
MoH	Ministry of Highways
MoMWD	Ministry of Megapolis and Western Development
NGO	Non-Governmental Organization
PAI	Project Area of Influence
PAP	Project Affected Person
PIU	Project Implementation Unit
PMU	Project Management Unit
RAP	Resettlement Action Plan
RDA	Road Development Authority
SCDP	Strategic Cities Development Project
SDO	Social Development Officer
SEP	Stakeholder Engagement Plan
SLR	Sri Lanka Railways
SLTB	Sri Lanka Transport Board
T-n-G	Touch and Go
WB	World Bank
W-GRM	Workers' Grievance Redress Mechanism

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1. INTRODUCTION/PROJECT DESCRIPTION

1.1 Introduction

The purpose of the present Stakeholder Engagement Plan (SEP) is to explain how various stakeholders relating to the project will be engaged throughout the course of the project and which methods will be used as part of the process. The SEP also outlines the responsibilities of the project management unit (PMU), other relevant government institutions and contractors in the implementation of stakeholder engagement activities, including the ways in which the PMU and contractors will communicate with stakeholders; the mechanism by which people can raise concerns; provide feedback; and/or make complaints about the PMU, the contractors, and the project itself. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

This report presents the Stakeholder Engagement Plan (SEP) which has been prepared and will be implemented by the Project Management Unit (PMU) set up under the Ministry of Highways, Road Development Authority, in preparation for the Kandy Multimodal Transport Terminal Development Project (KMTT) Project. The report includes: description and overview of the KMTT project, including environmental and social risks and impacts; national and World Bank requirements on stakeholder engagement, information disclosure and consultations; summary of stakeholder engagement activities already organized under the project; stakeholder identification and analysis; proposed stakeholder engagement program for the project; roles, responsibilities and resources for the stakeholder engagement program; grievance redress mechanism; and monitoring and reporting requirements for the SEP.

1.2 Project Description

According to a study carried out by the Strategic Cities Development Project and the World Bank in 2015¹, nearly 389,000 commuters enter into the Kandy city in the Central Province of Sri Lanka on a typical weekday through different transport modes for various purposes (27 percent for employment, 19 percent for education purposes, etc). Around 50 percent of the commuters (209,000) use public bus transport to enter the city through approximately 5,000 bus trips daily. The high volumes of bus and passenger flows into the city has resulted in significant levels of congestion in the heart of the city during peak hours, leading to inefficiency and loss of productivity. The KMTT project has the potential to significantly improve the economic contribution of the Kandy region by improving efficiency of its transport system, improving productivity of the commuters and operators, and increase the region's attractiveness as a tourist destination. Improved accessibility and connectivity through the project will also provide more opportunities and access to economic and social activities of the city, thereby promoting inclusiveness among its citizens.²

Specifically, it is envisaged that, by the time of completion, the new transport terminal will contribute towards the goal of relieving traffic congestion in the World-Heritage City of Kandy by relocating the

¹Public Transport Design & Operations Management Plan & Strategic Traffic Demand Management & Design Plan for Kandy

² World Bank (2019) – Concept Note on a proposed Credit in the Amount of 70 (US\$M) to Democratic Socialist Republic of Sri Lanka for Kandy Multimodal Transport Terminal Development Project

dispersed and poorly coordinated services provided by three separate bus stands in Kandy (GSBS, Clock Tower and Torrington) and an idle bus parking facility in Bogambara in a centralized multistoried structure specially designed for the purpose of this project. The project is also expected to result in improved coordination and efficient management of all public transport services under a new management system to be installed in KMTT for the purpose of orderly restructuring of all public transport operations in Kandy. In particular, the KMTT will be implemented in ways that reduce traffic congestion, waiting time of commuters, enhance the quality of services provided to commuters and eventually the use of public transport by 300,000 or more people moving into and out of Kandy for work, education, pilgrimage, tourism and securing health and other services on a daily basis.

The Project Development Objective (PDO) of the KMTT Project is to enhance accessibility, efficiency, and safety of public transport of Kandy city by constructing the Kandy Multimodal Transport Terminal (KMTT). The terminal is expected to integrate bus, rail and some para modes of transport (e.g. three-wheelers) and pedestrian commuters in the Kandy city. The project has the following three components:

Component 1: Development of Kandy Multi Modal Transport Terminal (KMTT)

This component will finance the construction of the multimodal- transport terminal at the existing Good Shed Bus Station (GSBS) in Kandy which include the following civil works.

- i. Construction of the main structure of the KMTT with three floor sand the required facilities for the bus operations and provision of other related services
- ii. Construction of a 150m long Skywalk starting from Old Peradeniya Road to William Gopallawa Road while connecting the access to the Kandy General Hospital, Railway Station and the KMTT
- iii. Construction of a public space on top of the terminal for the convenience and benefit of commuters
- iv. Construction of parking facilities besides the KMTT for long-distance buses, three-wheeler taxis and private vehicles.

The design layout of the KMTT main terminal includes the following structures and facilities.

Level	Structures and Facilities
Ground Floor	(i) 22 bus parking bays, 5 boarding and alighting bays and 13 T-n-G bays; (ii) one dedicated operation and maintenance bay; (iii) emergency vehicle bay; (iv) vertical circulation cores- elevators, staircases and public utilities; (v) operations and administration services; (vi) 7 commercial outlets (6’X6’ shops); (vii) circulation ramps for busses; (viii) connection to the underground pedestrian walkway connected with nearby streets; (ix) connection to existing alleys connecting the Peradeniya Road and “Aadu-patti” area into the Terminal Building (channeled into the Passenger Walk-ways; (x)toilets, and nursing rooms for passengers; (xi) parking facilities for Private vehicles and three-wheelers in the parking building (xii) service connections to first floor bus parking, including road connectivity around the parking building available for private vehicles and busses; and (xiii) three wheeler drop-off and pick up location in between the terminal building and the parking building
First Floor	(ii) 27 boarding and alighting bays; (ii) one operation and maintenance bay; (iii) emergency vehicle bay; (iv) vertical circulation cores – elevators, staircases and public utilities; (v) circulation ramps for busses; (vi) 10 shops (8’X8’); (vii) toilets, and nursing rooms for passengers; (viii) 72 bus parking bays, in the parking building; (ix) connectivity between the first floor of the terminal building and the first floor of the parking building by a bridge; (x) drivers’ rest room, (xi) cafeteria, and (xii) toilets in the Mezzanine floor of the parking building

Second Floor	(iii) arrival plaza and public concourse; (ii) passenger ticketing counters and waiting areas (air-conditioned); (iii) lounge facilities and commercial area (698 sq.m); (iv) passenger utilities; (v) administration and operation units; (vi) staff utilities and amenities; (vii) vendors' square (18 shops and one pharmacy) (viii) food court with 200 seats; (ix) banking services for passengers; (x) toilets, and nursing rooms for passengers; (xi) sky walk connecting Peradeniya Road, Kandy Railway Station, William Gopallawa Mawatha and Kandy General Hospital; (xii) 9 meter wide Skywalk (with space for 44 shops 8'X8') inclusive of shopping spaces; and (xiii) railway viewing decks covering 2m on either side of the sky-walk with 5m clear walking space for pedestrian movement
Rooftop	(iv) Roof-top garden with children's play area; (ii) green cover and an entertainment arena; (iii) roof of the terminal building will be used as the catchment for the rain-water harvesting system, water from which will be used for irrigating the roof top garden and also for the toilet flushing purposes after due treatment; and (iv) connection to all floors of the terminal building and the sky-walk by elevators and stairs.

Component 2 – Urban integration and road safety improvements around KMTT

This component includes:

- i. Sub-component 1: Technical assistance to identify safer and better pedestrian circulation and access to railway station which will: (i) identify improvements for pedestrian circulation around the KMTT; (ii) identify possibilities for Transit-oriented-Development (ToD) to make the terminal area a compact, mixed-use, pedestrian-friendly development organized around the terminal, embracing the idea of locating amenities, employment, retail shops, and housing around transit hubs that promotes transit usage and non-motorized travel.
- ii. Sub-component 2: Road Safety Improvement (Enforcement and Education). The project will comprehensively address safety from three major angles: (i) engineering design to inform safe road and walkway design especially for vulnerable groups in the area around the railway station; (ii) enforcement, legal and policy aspects; and (iii) education/campaign to the public.

Component 3: Institutional strengthening and capacity building

This is an umbrella TA component which will address a broad range of capacity building requirements for the overall management of the terminal, including adaptation to new ESF framework, gender and personal safety aspects, and climate hazard prevention/adaption.

1.3 Proposed Management Structure

The proposed structure for the management of KMTT will be a legal entity in the form of a Registered Company/Trust established under the Companies Act of Sri Lanka, and ratified by an Act of Parliament. The Company/Trust will be managed by a Board of Management, whose composition will include senior officers representing the Treasury, Ministry of Transport, Ministry of Urban Development, Water Supply and Housing Facilities, Ministry of Highways, and Ministry of Provincial Councils and Local Government. The Board of Management will be responsible for setting the policy and strategic directions for the operations of the KMTT, and ensuring sustainability, accountability and transparency in all its operational activities. The Board of Management will establish an executive committee of experts specialized in bus and railway transport, finance, and commercial development. They will be the paid employees of the Company/Trust responsible for setting standards for the terminal operations, establishing tariff systems, assets maintenance and development, determining rental payments to the owners (institutions) of land on which the KMTT is built, and financial management and profit-making. The committee of experts will be assisted by a Facility Manager and a Terminal Operator. The executive

committee will also be assisted by CPPTSA and SLTB in setting regulatory mechanisms, bus fares and tariff systems.

The overall objectives from this envisaged structure may be set out as follows:

1. To **hold stewardship** of the facility and the land on which the KMTT is built and to provide an agreed rental payment to land owners.
2. To ensure that a legal entity is **responsible for its continuity** as a multimodal terminal and for its continuous development and modernizing in keeping with the transport requirements and technological developments.
3. To **manage the KMTT as a non-profit making venture** while earning revenue to manage its own funding requirements for maintenance & for development and furthermore to pay a pre agreed rental for the use of land and any return on investment. Any surpluses to be made available for user improvements or concessions to passengers.
4. To **ensure standards of the physical space designed** for the use of the passengers, operators and vehicles
5. To **ensure commercial sustainability** so that the designed commercial space is fully utilized in a manner that is beneficial to the users of the facility while earning the optimum revenue. Further to ensure that the transport facilities available for passengers and operators are not compromised due to any commercial activity and that the required level of safety and security standards are maintained at all times.
6. To **ensure the efficiency of the different multi modal transport operations** so that they are carried out as planned and as per schedule providing the highest level of service to passengers and to the different transport service providers.

Proposed management model will be a Trust that will:

- Have a Board of Management/Trust represented by senior officers not below the rank of Director from the (a) Treasury, (b) M/Transport, (c) M/M&WD, (d) M/PC&LG, and (e) M/Highways. There will also be four Executive Board Members comprising (i) a senior expert in railway or bus transport operations, (ii) a senior expert in land development, (iii) a senior expert in finance and (iv) a Managing Director with commercial expertise preferably in the private sector all of whom will be contracted employees of the Trust. The representative of the Treasury will be the chairman.
- Receive land and transport infrastructure on long lease (30-99 yrs). But it will not acquire land or property, but will become the custodian of such land handed over by the UDA or any other institutions.
- Agree to pay rental value on a proportion of the commercial rates to the land owners as determined by the Valuation Department and the proportion determined by Cabinet of Ministers.
- Set national standards for terminals and fee structures for using the terminals
- Appoint Facility Managers for a period of up to 10 years after agreeing for such manager to pay agreed rental values to the asset owners
- Set standards for Terminal Operating Systems (ToS)
- Be responsible to ensure profitability of the terminal and the payment to the asset owners.
- Be Created through Company Act and recognized by Act of Parliament eventually.

The day to day transport operations of the facility will be handled by different entities that will include:

- (a) **Facility Manager (FM)** who appointed by the TRUST who will manage the physical facilities and the commercial aspects of the KMTT. The FM would be appointed by the KMTT-TF.
- (b) **Terminal Operator (TO)** who be a party identified by the FM who will manage the terminal operations, ticketing and parking control and all other functions directly relating to buses and the handling of bus passengers.
- (c) **Regulators**- namely the CPPTSA and the NTC which regulates the private buses and the SLTB which is the self-regulator for State bus operations. The SLR will also be included if and when the station area is also included in the KMTT operations at a future date.
- (d) **Terminal Management Advisory Committee (TMAC)** also appointed by the TRUST comprising all stakeholders.

1.4 Current Status of the KMTT Project

The KMTT project was originally prepared as one of the sub-projects under the Strategic Cities Development Project (SCDP). However, given the significant implementation delays faced by SCDP, the strategic importance of addressing congestion and mobility issues in Kandy, the technical complexity of the KMTT, linkages of other proposed transport interventions in the city to the KMTT which have already been incorporated to the design of these proposed projects and the size of the intervention, the government of Sri Lanka (GoSL) and the World Bank agreed to carry forward the development of the KMTT as a stand-alone project, separated from SCDP. Therefore, the new project has been developed on the ground work that has already been carried out under SCDP to continue and complete the construction of the KMTT. The estimated project cost is USD 70 million, with the excepted cost for the construction of KMTT at 2018 prices at USD 61 million.

A number of preliminary works under the development of the KMTT has been initiated under SCDP and is currently in various stages of procurement, implementation, and operating. These activities include (i) development of three transitional terminals and four touch-and-go sites to relocate the current bus operations at GSBS, and to clear the land for the development of KMTT; (ii) design and construction of facilities for Sri Lanka Railways (SLR) (construction of four storied building for relocation of part of workshops and office space of SLR Kandy, construction of new residential building for affected facilities of SLR, and construction of new timber workshop building and access road) as the existing property of SLR adjacent to the Kandy GSBS was released for KMTT construction; (iii) resettlement of vendors and business activities operated in GSBS area to clear the land for KMTT construction (a Resettlement Action Plan based on World Bank safeguards policies has been developed and disclosed for this purpose and is currently being implemented) and (iv) an Environment Screening Report and Environmental Management Plan for the KMTT construction area has been developed for which clearance has been granted by the World Bank.³ Moreover, the project has launched a separate livelihood restoration plan to support the restoration and improvement of business activities of the affected parties which was implemented by an external team of business development experts (See, Resettlement Action Plan for KMTT disclosed in SCDP's website⁴). Ministry of Highways will recruit a resettlement/livelihood expert to continue with the work initiated by restoration consultants.

³ World Bank (2019) Concept Note on a proposed Credit in the Amount of 70 (US\$M) to Democratic Socialist Republic of Sri Lanka for Kandy Multimodal Transport Terminal Development Project

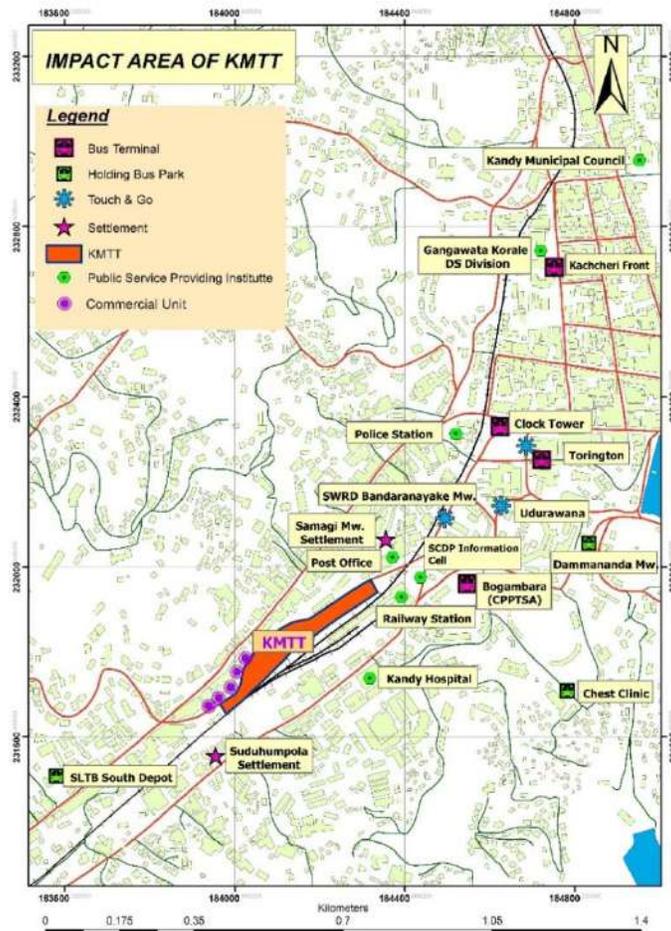
⁴ https://www.scdp.lk/pdf/social_safeguard/Kandy/Roads/SCDP%20Resettlement%20Action%20Plan-KMTT-Final.pdf

1.5 Project Location

KMTT will be established in the site of the current Good Shed Bus Stand (GSBS) as an integrated modern transport terminal linking bus services provided by the public and private sectors, railway services as well as other complementary public transport services. After reviewing two alternative sites for the project located in the northern and southern borders of Kandy city, GSBS was selected as the project site because of its proximity to the city center and availability of a sufficient quantity of crown land (i.e., public land) currently held mostly by transport authorities such as Sri Lanka Railways (SLR) and Sri Lanka Transport Board (SLTB), and that can be accessed by the project.

The surroundings of the site chosen for KMTT encompass a number of government's service providing institutions, commercial business establishments, settlements, and transitional bus operating sites now established to shift the current bus operations at GSBS during the construction period of the KMTT. Apart from these structures, there are public roads, railway lines and Meda Ela canal located within the boundaries of the KMTT. The nearest service providing institutions are the Kandy main post office, Kandy railway station and the Kandy General Hospital, all located within approximately 500 m away from the KMTT site. Moreover, the area surrounded by KMTT is crowded with various commercial structures, and people and their vehicles moving around to access the above-mentioned public places (See Figure 1 below for the site map).

Figure 1: Site map of KMTT



1.6 Decisions Currently Under Consideration for Public Inputs

The project launched an information dissemination campaign via both print and electronic media as well as by displaying public notice boards at strategic locations in the Kandy City, and uses a mobile phone technology to inform the commuters and other stakeholders such as bus operators and their crew on the planned bus operations in the transitional sites, and will continue until such time the public is fully aware of the new bus operating arrangements. The project arranged help desks at transitional bus operating sites to assist the vulnerable groups to locate their respective bus operating destinations. Moreover, the project has engaged with the commuter population in continuous consultations using different modes of communications such as informal consultations and interviews at transitional sites, user satisfaction surveys, placing complaint boxes at transitional sites, providing hot-line services etc. to receive commuters' feedback, grievances and complaints on new bus operating systems. Any grievances/complaints received are immediately addressed or within a reasonable time frame, and a feedback given to the aggrieved parties and complainants on the decisions made to address the issues. This same communication and feedback process and the methodology will be followed to receive public feedback on the proposed KMTT design as well as on its operations throughout KMTT implementation. Additionally, a series of mini-workshops have been organized, and will continue to be organized, for different stakeholder groups to elicit their views and feedback, specifically on the following.

- Final engineering design of KMTT
- Operational plan of the bus services and their timeframes
- Improvements for pedestrian circulation and access to station
- Plans for Transit-oriented-Development (ToD)
- Road safety improvement
- Education/campaign to the public
- Gender and personal safety aspects
- Climate hazard prevention/adaption
- Parking facilities for long distance buses and touch-and-go systems for local buses
- Facilities to be established at KMTT for the benefit of commuter population
- Terms and conditions governing tendering process of the business units to be constructed within KMTT
- Traffic management plan during KMTT construction
- Construction plan, methods and time frames of the civil works of KMTT

1.7 Potential Social and Environmental Risks and Impacts

The KMTT project has caused permanent and temporary economic displacements to around 820 shopkeepers, vendors and their employees, three-wheeler taxi drivers, and due to requisition of state land as well as acquisition of private land⁵for the KMTT (refer Resettlement Action Plan for KMTT). The compensation payments for all affected parties (APs) have now been concluded, and a livelihood restoration plan implemented to assist and support the APs to restore and re-establish their business and livelihood activities.

The following social and environmental risks and impacts are anticipated during project implementation.

- a. Civil construction works may cause some unanticipated adverse impacts on communities living beyond the area earmarked for the project. Such adverse impacts may include accidental damages

⁵Private land impacted two owners and consisted of a total of 0.019 ha

to properties due to vibration causing from the use of heavy machinery and piling, minor access difficulties, safety issues, and inconveniences and disturbances due to dust and noise generated by construction works. Since the part of the adjoining buildings are at a higher elevation the environmental impacts such as issues due to generation of dust and noise will be significant and it is required to be mitigated effectively. The project in coordination with other stakeholders such as contractors, consultants etc. will continue to monitor such possible adverse impacts, engage in consultations with those potentially affected parties, and provide access to grievance redress mechanism to address and resolve those unanticipated construction related impacts.

- b. As mentioned earlier, the railway station and the bus operations at GSBS are located in close proximity to each other and provide convenient access to commuters who use both trains and buses for their travel. However, with the shifting of GSBS bus operations to transitional sites, train and bus services will be temporarily disjointed causing inconveniences to passengers who move from buses to trains and vice versa.
- c. The closure of the main road traversing the GSBS area for construction work may affect the traffic movements along the Sambodhi Mawatha, and may adversely affect the neighboring communities such as Suduhumpola.
- d. The short access paths that cut-across the KMTT site, and used by the public for their quick and easy reach to public places such as the hospital, railway station, post office etc. will be lost for public use with the fencing-off of the site for civil works. The public will have to use alternative routes to access those public places which are relatively longer.
- e. One of the adjacent settlements (Samagi Mawatha residents) caused temporary lose of their access roads to their residences which required the provision of an alternative access by the project.
- f. The preliminary technical design of the KMTT has been deemed as being of subpar quality as a result of which, the Ministry of Highways is considering a Design-Build contract with an improved design based on the parameters set by the preliminary designs. Additional consultations will need to be carried out with all the relevant stakeholders on the design, including in the areas of safety and accessibility, with particular attention to the views of the more vulnerable groups.
- g. The fragmented institutional structure in the transport sector would require the project to liaise with a number of stakeholders to ensure successful implementation. Further, as the project is part of a broader urban development strategy of Kandy city, maintaining close coordination with all stakeholders involved in the implementation of the broader strategy would be critical.

1.8 Project Implementation Arrangements and Time Frame

As the first phase of the implementation, site clearing and utility diversion has already been awarded and site clearing has been completed to the extent possible. Total contract period of the phase one contract is one year. Procurement work for the construction of the main building will be commenced by February 2023 the construction will be completed by December 2025. Operation period of the KMTT will be started soon after the construction work completed.

2. REGULATIONS AND REQUIREMENTS

2.1 National Requirements for Stakeholder Engagement

People's rights relating to access to information, consultation and engagement is recognized in both the Constitution of Sri Lanka as well as in the legal enactments described below.

2.1.1 Constitution of Sri Lanka

People's right to access information is enshrined in the Constitution of Sri Lanka (Chapter III, Section 14A) which advocates that every citizen shall have the right of access to any information as provided for by law, being information that is required for the exercise or protection of a citizen's right held by:

- (a) The State, a Ministry or any Government Department or any statutory body established or created by or under any law;
- (b) Any Ministry of a Minister of the Board of Ministers of a Province or any Department or any statutory body established or created by a statute of a Provincial Council;
- (c) Any local authority; and
- (d) Any other person, who is in possession of such information relating to any institution referred to in sub-paragraphs (a) (b) or (c) of this paragraph.

The Constitution further states that no restrictions shall be placed on the right declared and recognized by this Article, other than such restrictions prescribed by law as are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals and of the reputation or the rights of others, privacy, prevention of contempt of court, protection of parliamentary privilege, for preventing the disclosure of information communicated in confidence, or for maintaining the authority and impartiality of the judiciary.

2.1.2 Right to Information Act No.12, 2016

The Right to Information Act states that whereas the Constitution guarantees the right of access to information in Article 14A, and prescribes that every citizen shall have a right of access to information which is in the possession, custody or control of a public authority (Part 1 Section 3 (1) order to foster a culture of transparency and accountability in public authorities by giving effect to the right of access to information and thereby promote a society in which the people of Sri Lanka would be able to more fully participate in public life through combating corruption and promoting accountability and good governance.

2.1.3 National Environmental Act No.56 of 1988

Development projects which are designated as 'prescribed projects' by the Minister (in-charge of the subject of environment) require obtaining approval for such projects from the project approving agencies specified by the Minister, disclose the documents prepared for such approval, and respond to the public comments. The National Environmental Act (NEA) of 1988 prescribes that "it shall be the duty of all project approving agencies to require from any Government Department, Corporation, Statutory Board, Local Authority, Company, Firm or individual who submit any prescribed project for its approval to submit within a specified time an initial environmental examination report or an environmental impact assessment report as required by the project approving agency relating to such project and containing such information and particulars as may be prescribed by the Minister for the purpose" (Part IVC, 23 BB).

The NEA further states that “a project approving agency shall on receipt of an initial environmental examination report or an environmental impact assessment report, as the case may be, submitted to such project approving agency in compliance with the requirement imposed under subsection (1), by notice published in the Gazette and in one newspaper each in the Sinhala, Tamil and English languages, notify the place and times at which such report shall be available for inspection by the public, and invite the public to make its comments, if any, thereon.

Any member of the public may within thirty days of the date on which a notice under subsection (2) is published make his or its comments, if any, thereon to the project approving agency which published such notice, and such project approving agency may, where it considers appropriate in the public interest afford an opportunity to any such person of being heard in support of his comments, and shall have regard to such comments and any other materials if any, elicited at any such hearing, in determining whether to grant its approval for the implementation of such prescribed project. Where approval is granted for the implementation of any prescribed project, such approval shall be published in the Gazette and in one newspaper each in Sinhala, Tamil and English languages.

2.1.4 National Involuntary Resettlement Policy (NIRP), 2001

In reference to resettlement of persons displaced by development projects, the policy principles of the National Involuntary Resettlement Policy (NIRP) of Sri Lanka stipulate that “Resettlement should be planned and implemented with full participation of the provincial and local authorities”. Furthermore, its policy objectives require that all affected people are made aware of processes available for the redress of grievances that are easily accessible and immediately responsive.

2.2 World Bank Requirements for Stakeholder Engagement

The World Bank’s Environmental and Social Framework (ESF)’s Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. The SEP thus prepared has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 10)

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 Summary of Previous Stakeholder Engagement Activities

The initial stakeholder engagements of the project were largely confined to resettlement planning processes which commenced in November 2017. The stakeholders were primarily the APs, and a few other interested parties who had a direct stake in the KMTT project. Among the APs were shop renters, business operators and their shop assistants, mobile vendors and three-wheeler taxi operators. The APs also included vulnerable groups who fell into each of these categories. The other interested parties were the Kandy Municipal Council (KMC), Sri Lanka Railways (SLR), Sri Lanka Transport Board (SLTB) and the Central Province Passenger Transport Services Authority (CPPTSA). The key methodologies followed for stakeholder consultations and information dissemination comprised individual meetings and interviews, surveys, and focus group discussions (FGDs). Prior to moving of bus terminals and impacting vendors, a total of 22 FGDs were conducted with the participation of 192 APs consisting of 167 males and 25 females. The information cell established within walking distance from GSBS served as the main venue for consultations and information disclosure with affected parties. Records of the proceedings of stakeholder consultations and information disclosed were maintained from the inception, and they can be accessed from the SCDP project implementation unit located at No. 274, George E De Silva Mawatha, Kandy. These will be relocated to the RDA offices once established as PMU. Stakeholder engagements continued during resettlement action plan (RAP) implementation period as well. The outcomes of stakeholder engagements for consultations and information disclosure are summarized in Table 1.

Table 1: Stakeholder engagements, consultations and information disclosure during resettlement planning and implementation⁶

Venue	Date	Participants	Key points raised	Information disclosed
Information Cell	01 February 2018 to 12 June 2018 (6 FGDs)	46 male <i>business operators</i>	<ul style="list-style-type: none"> Concerns over their displacements Time for vacating their business premises Concerns over those who did not have title documents for their business premises 	<ul style="list-style-type: none"> Compensation package to be developed for the displaced 3 months advance notice to be given for vacating the premises Alternate arrangements for those without documents
Information cell	01 February	43 male and 9	<ul style="list-style-type: none"> What is the project 	<ul style="list-style-type: none"> Boundaries of the

⁶ All land has been secured following established obligations set out in RAP

Venue	Date	Participants	Key points raised	Information disclosed
and PIU office, Kandy	2018 to 12 June 2018 (6 FGDs)	female <i>shop rentiers</i>	<ul style="list-style-type: none"> affected area? What are the alternative arrangements for displaced persons? Are there any land acquisitions for the project? Time for vacating their business premises 	<ul style="list-style-type: none"> project affected area Compensation plans for displaced persons Extents of private land to be acquired 3 months advance notice to be given for vacating the premises
Information cell	01 February 2018 to 12 June 2018 (3 FGDs)	34 male and 6 female <i>mobile vendors</i>	<ul style="list-style-type: none"> Would the mobile vendors be allowed to operate around KMTT? 	<ul style="list-style-type: none"> Temporary relocation arrangements for mobile vendors Alternative livelihood arrangements as they would not be able to operate at KMTT
Information cell	01 February 2018 to 12 June 2018 (2 FGDs)	11 male <i>shop assistants</i>	<ul style="list-style-type: none"> When would they lose their jobs? Whether the project would compensate their loss of employment and income 	<ul style="list-style-type: none"> Proposed time frame for clearing the site Compensation plans for shop assistants
Information cell	01 February 2018 to 12 June 2018 (2 FGDs)	11 male and 8 female <i>non-titled business operators</i>	<ul style="list-style-type: none"> What is the project affected area? Concerns over those who did not have title documents for their business premises 	<ul style="list-style-type: none"> Boundaries of the project affected area Compensation policy for non-titleholders
CPPTSA Office in Bogambara	01 February 2018 to 12 June 2018 (2 FGDs)	16 <i>bus operators</i>	<ul style="list-style-type: none"> What are the transitional locations for bus operations? When would the bus operations be shifted to transitional locations? Where the long distance busses would be relocated? 	<ul style="list-style-type: none"> Plans for transitional bus operating sites Proposed time frame for shifting the bus operations to transitional sites
Information cell	01 February 2018 to 12 June 2018 (1 FGD)	6 male and 2 female <i>representatives of Samagi Mawatha settlement</i>	<ul style="list-style-type: none"> What is the project affected area? Are there any land acquisitions for the project Concerns over access restrictions to their settlement 	<ul style="list-style-type: none"> Boundaries of the project affected area Extents of private land to be acquired Plans to provide alternative access roads during construction period
Individual consultations at GSBS	January 2019	212 male and 64 female <i>APs in GSBS</i>	<ul style="list-style-type: none"> Criteria for determining entitlements 	<ul style="list-style-type: none"> Compensation policy and criteria for

Venue	Date	Participants	Key points raised	Information disclosed
			<ul style="list-style-type: none"> • Would the criteria include structural development carried out by business operators • Time for vacating their business premises • Would the project require relocation prior to payment of compensation? • Would the project help obtaining income certificates from divisional secretary? 	<ul style="list-style-type: none"> entitlements • Relocation policy and 3 months advance notice to be given for vacating the premises • Project's arrangements with Grama Niladhari and divisional secretary to issue income certificates
Residences of the APs	16 January 2019	Two <i>land owners</i>	<ul style="list-style-type: none"> • When would the land acquisition process be completed? • Would compensation be paid for loss of business? 	<ul style="list-style-type: none"> • Time frame for land acquisition process • Compensation entitlements
Meeting hall of the Kandy Post Office	15 March 2019 to 10 June 2019 (19 sessions)	412 male and 30 female APs in GSBS	<ul style="list-style-type: none"> • What are the main elements of the entitlement matrix? • Who are the members of the Entitlement Assessment Committee? • What are the documents to be submitted to the committee? • How would the project ensure the chance of getting a shop at KMTT? 	<ul style="list-style-type: none"> • Entitlement matrix • Composition of the EAC • Documentary evidences required in support of entitlements • Anticipated negotiations with KMTT management to allocate a quota of shops for displaced business operators
Meeting hall of the Kandy Post Office & Janamedura building	10 March to 15 June 2019 (18 sessions)	432 male and 42 female APs in GSBS	<ul style="list-style-type: none"> • Why do we need a business plan? • Will the project pay the full amount indicated in the business plan? • What is the process for preparing business plans? 	<ul style="list-style-type: none"> • Requirements of a business plan • Criteria for payment of compensation for livelihood restoration • Assistance to be provided for developing business plans
Information cell	7 March 2019 and 12 March 2019	15 members of two <i>Vendor Associations</i>	<ul style="list-style-type: none"> • Would our members get chance to avail a shop at KMTT? • Does the amount of compensation equal for all vendors? • Time for vacating their business premises 	<ul style="list-style-type: none"> • Anticipated negotiations with KMTT management to allocate a quota of shops for displaced business operators • Criteria for compensation

Venue	Date	Participants	Key points raised	Information disclosed
				assessments <ul style="list-style-type: none"> Relocation policy and 3 months advance notice to be given for vacating the premises
SCDP Kandy PIU office, Central Province Governor's office, Chef Secretary's office, KMC, and CPPTSA office	October 2016 to September 2018 (21 sessions)	667 representatives of KMC, CPPTSA, SLR, SLTB, Divisional Secretary, UDA and other stakeholder agencies	<ul style="list-style-type: none"> Ownership status of shop owners and vendors in the GSBS Scope of the entitlement matrix Relocation options available within the KMC area Impact area of the KMTT project Affected railway buildings and mode of compensation payments Establishment of Information Cell Arrangements for shifting utility services Potential locations for transitional bus operations Operation and management structure of the KMTT Details of the technical design Options for relocation of three wheeler parks and mobile vendors 	<ul style="list-style-type: none"> Preliminary technical design Footprint and immediate impact area of KMTT Resettlement Action Plan Draft entitlement matrix Role of information cell Designs for transitional bus operating sites Proposed management structure for KMTT Time frames for relocation of APs and commencement of KMTT civil works

Furthermore, informal face to face public consultations were conducted during environmental screening and the summary of feedback is as follows.

Venue	Date	Participants	Key points raised
In and around the proposed site for KMTT	22/10/2018, 07/10/2019, 08/10/2019	39 people interviewed face to face	<ul style="list-style-type: none"> Positive response for the overall development initiative considering environmental enhancement such as air quality improvement, creation of a healthy space, provision of modern and convenient facility, reduction of traffic congestion in the city. Request for adequate sanitary facility within the KMTT Bus parking should be controlled within the terminal Requirement of implementation of a proper traffic

			<p>plan during construction.</p> <ul style="list-style-type: none"> • Expressed the uncertainty on actual implementation of the project. • Expressed the concern over the designing of a terminal in the limited space with all the facilities. • Importance of establishment of a proper solid management mechanism for KMTT • Requirement of more passenger facilities within the terminal • Considerable environmental improvement is expected which is free of dust, vehicular emissions, sound and odour
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3.2 Lessons Learned from Previous Stakeholder Consultations

Engagement of stakeholders since the inception of the KMTT’s planning process, especially on resettlement planning facilitated rapport building and winning the trust and confidence of the APs and others in the project. Information elicited during consultations on the potential losses of APs, their concerns and aspirations extensively contributed to the development of a broad set of parameters for compensation entitlements of the APs which eventually framed the entitlement matrix of the RAP. Subsequently, these broad parameters were effectively used by the members of the Entitlement Assessment Committee (EAC) to determine the specific compensation packages entitled to individual APs. In addition, the EAC which was constituted by an independent group of professionals⁷ not only made independent decisions on compensation but also contributed to further strengthening the rapport between the project and the APs as well as their confidence in the project.

Consultations conducted with the Divisional Secretary and the Grama Niladhari⁸ and sharing of project related information with them provided impetus for these administrative officers to help the APs to obtain certificates of their respective incomes which were pre-requisite evidence in support of their compensation claims.

Consultations also gathered stakeholder feedback on several preliminary technical designs of the KMTT. The concerns expressed by the stakeholders on design impacts were communicated to the technical design teams which eventually resulted in a number of modifications to the preliminary designs. For example, (i) initial design for the rehabilitation of Meda Ela (central drainage canal of the city) was changed to minimize relocation impacts on commercial and residential structures located besides the S W R D Bandaranaike Mawatha; (ii) the width of the Skywalk was increased to provide space for constructing shops which can be later allocated to displaced vendors at GSBS; and (iii) a permanent motorable road was incorporated to the design for the benefit of residents along the Samagi Mawatha who would lose their access road during KMTT construction work.

The information cell established in the vicinity of the GSBS provided a form of one-stop-shop for the stakeholders including the APs to make any inquiries, access information that they would require, and to report their grievances and complaints. Furthermore, this information cell also served as the venue for

⁷ Project Director of SCDP (chairperson), Chief Valuer or his representative, representative of the Ministry of Lands, Commissioner of the Kandy Municipal Council or his representative, Deputy Project Director (Social) of SCDP and a representative of the Civil Society.

⁸ Village level administrative officer who reports to the Divisional Secretary

most of the consultations, particularly for small group consultations, and provided convenient access for the APs, a familiar environment, reduced their travel time, and saved their business times. The vulnerable APs particularly benefitted from this venue of the information cell and its comparative advantages.

Consultations carried out with other stakeholders (besides the project-affected persons) during the preparation of RAP also pointed to a broader consensus among almost all stakeholders, including KMC, SLR, SLTB, CPPTSA about the need for KMTT. Furthermore, judging by their responses during consultations, this agreement was also extended to all categories of APs in spite of the fact that many of them suffered from economic displacement caused by the establishment of the new transport terminal. This may be attributed to the personal day-to-day experience with the traffic problem in Kandy by all parties concerned and the efforts of the project team to explain the potential contribution by KMTT towards addressing this public concern.

Government institutions such as Natural Resources Management Centre (NRMC) and Central Environmental Authority (CEA) were consulted sharing the preliminary designs of the KMTT enabling to obtain the recommendations in order to incorporate them to the designs. As per the CEA guidelines the KMTT project is not a project categorized under the “prescribed project” and therefore the Environmental Assessment which has already been conducted is suffice and the ESMP will have to be shared with the CEA for monitoring purposes. Accordingly, the CEA approval has already been obtained for the development.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

For the purposes of the SEP, stakeholders of the proposed KMTT project have been, and will continue to be, divided into the following core categories: (i) project-affected; (ii) other interested parties; and (iii) vulnerable groups. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholders toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community’s and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

4.1 Project Affected Parties

‘Affected Parties’ are, persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as being most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

The KMTT has caused economic displacements to a diverse population of business operators of varying scales. The census survey conducted for the preparation of the RAP identified and enumerated 839 such persons falling into 18 different sub-categories of project affected persons. The main categories of those project affected persons are the shop renters, business operators, shop assistants, mobile vendors and three-wheeler taxi operators. Moreover, the project has affected or is likely to affect a number of other institutions such as the bus operators, institutions that manage and operate transport services such as CPPTSA, SLTB and SLR, voluntary associations of business operators and vendors, utility service providers, the KMC, and the bus commuters.

4.1.1 Project's Impact on Affected Parties and their Level of Influence over the Project

Table 2 provides an assessment of the project's risks and impacts on individuals, groups, local communities, and other stakeholders that may be directly or indirectly or positively or negatively affected by the project, and specifically on those directly and adversely affected by project activities. This assessment further extends to analyze the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes.

Table 2: Project's impact on affected parties and their level of influence

No.	Stakeholder Group	Impact	Influence
1	Permanently displaced business operators, shop rentiers and shop assistants in GSBS	High	Low
2	Temporarily displaced business operators in the KMTT's buffer zone	High	Moderate
3	Temporarily displaced mobile vendors and three-wheeler operators	Moderate	Low
4	Shop Owners' Association	High	Moderate
5	Mobile Vendors' Association	High	Low
6	Kandy Municipal Council (KMC)	High	High
7	Central Province Passenger Transport Services Authority (CPPTSA)	High	High
8	Sri Lanka Transport Board (SLTB)	High	High
9	Sri Lanka Railways (SLR)	High	Moderate
10	Utility services providers (electricity, water, telephones)	Moderate	Low
11	Bus operators	Moderate	Moderate
12	Bus commuters	Moderate	High
13	Female bus commuters	Moderate	Moderate
14	Women construction workers	Moderate	Low

4.2 Other Interested Parties

'Other Interested Parties' constitute individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Accordingly, there are a number of other stakeholders who have a stake, have expressed, or may express interest in KMTT due to a variety of reasons. They include project implementing agencies, project partners, political institutions, service providers, host communities, civil society organizations, NGOs, religious institutions, political authorities, academic institutions, and project beneficiaries.

4.2.1 Interests and Level of Influence over the Project by Other Parties

Table 3 presents the multiple interests of other parties and their level of potential influence over the KMTT project.

Table 3: Interests of other parties and their level of influence over the KMTT project

No.	Stakeholder Group	Interests	Influence
PROJECT IMPLEMENTERS AND PARTNERS			
1	Ministry of Highways – Road Development Authority	<ul style="list-style-type: none"> • Realize the national goal of efficient management of city traffic and thereby contributing to the country's development • Ensure the effective and timely completion of the project • Demonstrate a replicable model for transport services 	High

2	Kandy Municipal Council (KMC)	<ul style="list-style-type: none"> • Ease city traffic and provide a modern transport facility • Be a strategic partner for management of the KMTT. • Restore the revenue base that was lost by the demolition of the rented shops to release the land for construction of KMTT • Minimize disturbances to other city functions during construction of KMTT • Provide enhanced municipal services to KMTT and business places. 	High
3	Sri Lanka Railways (SLR)	<ul style="list-style-type: none"> • Increase the market share of commuters with an integrated link between railway operations and KMTT's bus operations • Be a strategic partner in the management of KMTT since it released part of their land for KMTT construction • Ensure quality of assets provided by the project in lieu of lost properties • Resettle the temporarily displaced staff (due to demolition of their staff quarters to release land for KMTT) in the new staff quarters being constructed under KMTT project • Minimize disturbances to railway operations during KMTT construction 	High
4	Central Province Passenger Transport Services Authority (CPPTSA)	<ul style="list-style-type: none"> • Be a strategic partner in the management of KMTT • To manage the transitional sites and their ancillary facilities • Plan the bus operations in KMTT and optimize the economic gains from more efficient operations • Integration of the public and private bus operations 	High
5	Sri Lanka Transport Board (SLTB)	<ul style="list-style-type: none"> • Be a strategic partner in the management of KMTT • Participate in the planning of bus operations in the KMTT 	High
6	Central Environmental Authority	<ul style="list-style-type: none"> • To monitor and analyze the air quality measurements due to implementation of KMTT and the new public transport management since Kandy was recorded as high in air pollution • To obtain approvals for dumping site selection and management 	High
6	Bus operators	<ul style="list-style-type: none"> • Review the potential impacts of KMTT's new bus operating plans on their operational schedules, running costs and incomes • Negotiate with relevant authorities to avoid/minimize their running costs and losses, if any • Improve the quality of transport and increase the income. 	Moderate
SERVICE PROVIDERS			
7	Kandy General Hospital	<ul style="list-style-type: none"> • Appraise the potential impacts on access to hospital, movement of vehicles e.g. ambulances etc. during construction period and to work out remedial measures to minimize inconveniences 	Low
8	Kandy City Police	<ul style="list-style-type: none"> • Manage traffic during KMTT construction period • Reduce traffic congestion with KMTT's new bus operations 	Low
9	Divisional Secretary	<ul style="list-style-type: none"> • Monitor and review the progress of construction work, and 	Moderate

		to report to the Divisional Development Committee (DDC) and other higher authorities	
10	Utility Service Providers (KMC, CEB, Sri Lanka Telecom, Dialog)	<ul style="list-style-type: none"> • Ensure that construction work avoid/minimize adverse impacts on utility services • Restore the utility services in the event of any breakdowns due to civil works of KMTT 	Low
HOST/LOCAL COMMUNITY			
11	Host/Local community surrounding the KMTT who comprise service providers, settlements and business operators	<ul style="list-style-type: none"> • Review the final engineering design of KMTT • Receive information on the potential impacts of KMTT construction work and the post construction impacts on their institutions, settlements and business operations and incomes • Ensure that their properties are not accidentally damaged due to construction work • Ensure that they are protected from construction related impacts such as dust, noise, vibration and any form of misbehaviors of labor teams • Find possible employment during construction work • Search for opportunities for providing various services to contractor's labor teams 	Moderate
VOLUNTARY ORGANIZATIONS, NGOS, ACADEMIC INSTITUTIONS AND BANKS			
12	Mobile Vendors' Association	<ul style="list-style-type: none"> • Ensure temporary relocation of the mobile vendors • Support the mobile vendors to establish alternate livelihoods 	Low
13	Shop Owners' Association	<ul style="list-style-type: none"> • Assist members in obtaining shops at KMTT by negotiating with KMTT management 	Moderate
14	Janathakshan (NGO serving as the livelihood consultant to KMTT)	<ul style="list-style-type: none"> • Efficient and effective implementation of the livelihood restoration plan and ensure deliverables 	Low
15	Chamber of Commerce	<ul style="list-style-type: none"> • Increase their membership and facilitate technical assistance for businesses at KMTT 	Low
16	University of Moratuwa	<ul style="list-style-type: none"> • Provide technical trainings for the operations of KMTT 	Low
17	Commercial Banks	<ul style="list-style-type: none"> • Explore lending opportunities for businesses to be restored/newly established at KMTT 	Low
18	Environmental NGOs/ Activists	<ul style="list-style-type: none"> • Expectations of no harm to the environment, effective on-site mitigation and proper compensation for residual impacts due to development 	Moderate
POLITICAL AND RELIGIOUS INSTITUTIONS AND MEDIA			
18	Local and provincial level political authority	<ul style="list-style-type: none"> • Ensure efficient and safe transport service to commuters • Ensure sharing the benefits of KMTT with their respective political clientele 	Moderate/High
19	Religious institutions in Kandy	<ul style="list-style-type: none"> • Ensure efficient and safe transport service to commuters in Kandy, and those attending religious functions 	Moderate
20	Press and Media	<ul style="list-style-type: none"> • Provide publicity to the developments of KMTT • Ensure transparency in all activities related to the implementation of KMTT 	Moderate/High
COMMUTERS			
21	Commuters (local and foreign)	<ul style="list-style-type: none"> • Avoid adverse impacts causing from relocation of current bus operations at GSBS in transitional sites 	High

		<ul style="list-style-type: none"> • Expectations for efficient and safe transport service at KMTT 	
CONTRACTORS AND CONSULTANTS			
22	Contractors	<ul style="list-style-type: none"> • Bid for potential contracts or subcontracts • Quality completion of the construction work 	High
23	Supervision consultants	<ul style="list-style-type: none"> • Bid for consultant positions • Effective and efficient monitoring and supervision of the contractors 	High

4.3 Disadvantaged/Vulnerable Individuals or Groups

‘Vulnerable Groups’ are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Among the persons displaced by the KMTT project were 128 vulnerable or disadvantaged persons comprise 82 males and 46 females. They included (i) 45 persons suffering from chronic illnesses(ii) 4 persons with disabilities; iii) 28 persons who are over and above 70 years of age; (iv) 34 women headed households without any support; and (v) 17 households who are living below the poverty line.

Apart from the above mentioned economically displaced vulnerable groups, construction work of KMTT and its operations can cause adverse impacts on several other vulnerable and disadvantaged groups. They would include the following groups:

- Women workers at the construction site may possibly face gender discrimination in terms of wage disparities, deprivation of their labor rights, and access to reasonable sanitary facilities. They can also be subject to gender-based violence and sexual harassment and exploitation.
- Children and adolescents who had dropped out of school and are from poor families may be motivated to find employment in construction work thereby becoming vulnerable to labor exploitation, sexual harassment and exploitation, and alcohol and drug abuse and sometimes drug peddling.
- The street beggars who are dependent on cash assistances provided by commuters and business operators at GSBS will lose their incomes, and may experience restricted access to alternative locations for begging.
- Poor women and children in the surrounding slum communities may be induced to engage in high risk behaviors such as prostitution, alcohol and drug peddling etc. in order to find incomes by serving the labor teams.
- The elderly and disabled commuters may experience difficulties to enter the KMTT complex via Skywalk having to walk a long-way from the point of entry to the Skywalk.
- Poor commuters may find difficult to afford to pay for commuter services at KMTT such as food and drinks, sanitation facilities etc. as the charges for those services will be comparatively high.
- Women and girls accessing the terminal, skywalk, and pedestrian public spaces may be subject to sexual harassment and gender-based violence.

⁹ Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Consultations with vulnerable APs who were displaced by the project are continued, and their requests for any assistance are treated with priority. Moreover, they are also invited to participate in livelihood related training programs conducted by the livelihood consultant team. Access to information and participation in consultations by these vulnerable persons/groups are largely curtailed by their illiteracy or low education to understand information disseminated, and physical disabilities, absence of careers/family support to accompany them, and lack of affordability to spend on transport, communication tools etc. to participate in consultative processes. Providing access to information and encouraging their participation in consultations require special measures such as face- to-face verbal communications, public address systems, help desks at bus operating sites including KMTT, a kiosk for reporting incidences or sexual harassments for women and girls at bus operating sites and terminals, a grievance redress mechanism at the construction site to report incidences of gender-based violence, and a modest travel allowance for their participation in consultative meetings.

Table 4 identifies the communication methods and resources required for the engagement of vulnerable persons and groups in the project.

Table 4: Engagement of vulnerable persons and groups

No.	Vulnerable Groups and Individuals	Characteristics/ Needs	Preferred means of notification/consultation	Additional Resources Required
1	Displaced APs in the GSBS	Low level of education, engage in informal sector businesses and other activities in the GSBS. Need information on relocation and support for livelihood restoration	Individual and group consultations, leaflets and information through information cell	Need special attention through a dedicated social officer and livelihood restoration consultant team
2	Women construction workers	Low level of education. Can engage only in unskilled worker category. Reluctance to participate. Need awareness on worker rights and forums to report their grievances	Individual and group consultations. Deploy a dedicated female liaison officer to the Information cell. Use specially designed print media.	Meetings to be held only during holidays at convenient times
3	Poor children & adolescents who seek employment in construction work	Low level of education, less attention of the family, prone to external negative influences. Need to educate on risks and dangers at work places	Individual and group awareness programs with videos and printed material.	Mobilize external resource agencies who work with these target groups
4	Street Beggars	Fully dependent on commuters and business community. Need information on alternate options to begging and social security systems	Individual consultations.	-
5	Poor women and children who will engage in high risk behaviors	Low level of education. Reluctance to participate. Need regular information on law enforcement.	Individual and group consultations with awareness raising programs with videos and printed material.	Use law enforcement agencies to for awareness raising and arrange meetings at convenient times

No.	Vulnerable Groups and Individuals	Characteristics/ Needs	Preferred means of notification/consultation	Additional Resources Required
			Deploy a dedicated female liaison officer to the Information cell.	
6	Elderly and disabled persons	Impairment of hearing, vision and mobility	Multi channeled information flow. Individual consultations	Deploy commuter care wardens at bus operating sites to provide information and guidance, and to receive their feedback and use of public address system
7	Poor commuters	Socially backward, low level of education, low income, slow adaptation to modern environment. Need special guidance.	Team of trained liaison officers with uniforms to disseminate the information and guide the commuters.	A group of liaison officers to be deployed at transitional bus operating sites and later at KMTT. Use a public address system

4.4 Summary of Stakeholder Needs

Table 5 describes the needs of the key stakeholders who have been identified and consulted for their preferences/needs for engagement.

Table 5: Communication needs of the stakeholders

Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means	Specific needs
Long-term displaced business operators, shop rentiers and shop assistants in GSBS	161 business operators, 194 shop rentiers and 245 shop assistants	Sinhala and Tamil	Written information, telephone calls, individual visits	<ul style="list-style-type: none"> • Arrange off peak business hours/holidays for meetings/telephone calls. • Meeting venues with refreshments • Consent of shop owners necessary to meet shop assistants. • Advance notification for meetings • Printed material should be prepared in easy to understand simple language
Temporarily displaced business operators in the KMTT's buffer zone	39 business operators who lose their livelihoods and incomes during KMTT construction	Sinhala and Tamil	Written information, telephone calls, individual visits and group consultations	<ul style="list-style-type: none"> • Arrange off peak business hours/holidays for meetings/ consultations and telephone calls • Meeting venues with refreshments
Temporarily displaced mobile vendors and three-wheeler operators	215 mobile vendors who move from place to place carrying his/her merchandise on head or in a cart or operate from a fixed	Sinhala and Tamil	Written information, letters, telephone calls and individual consultations	<ul style="list-style-type: none"> • Meetings to be organized through Mobile Vendors' Association • Meeting venues with refreshments • Three-wheeler operators cannot attend formal meetings as they are frequently running on roads

Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means	Specific needs
	place and 65 three-wheeler operators			<ul style="list-style-type: none"> Printed material should be prepared in easy to understand simple language
Women construction workers	Women to be recruited for unskilled work in the KMTT construction site	Sinhala and Tamil	Written information, group consultations/awareness programs	<ul style="list-style-type: none"> Arrangements to be made via contractors to organize meetings Printed material to be prepared in easy to understand simple language
Shop Owners' Association	A voluntary association of the KMC's lease holding shop owners	Sinhala & Tamil	Written information, letters, telephone calls addressed to the chairperson	<ul style="list-style-type: none"> Request the Association to convene meetings of the shop owners Meeting venues with refreshments to be provided Printed material in easy to understand simple language
Mobile Vendors' Association	A voluntary association of the mobile vendors	Sinhala & Tamil	Written information, letters, telephone calls addressed to the chairperson	<ul style="list-style-type: none"> Request the Association to convene meetings of the mobile vendors Meeting venues with refreshments Printed material prepared in easy to understand simple language
Kandy Municipal Council (KMC)	Loses its land and revenue incomes from shops for KMTT	Sinhala, Tamil and English	Formal meetings, written information, letters, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times
Central Province Passenger Transport Services Authority (CPPTSA)	Plan, regulate and monitor private sector transport providers in the Central Province and link with SLTB for coordinated operations. Will be a key partner in KMTT operation and Management.	Sinhala, Tamil and English	Formal meetings, written information, email, letters, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times
Sri Lanka Transport Board (SLTB)	Public sector transport provider and operates transport facilities jointly with private sector transport services. A land owner of the KMTT site and will be a key partner in the KMTT management.	Sinhala, Tamil and English	Formal meetings, written information, letters, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times
Sri Lanka Railways (SLR)	Provide rail transport services to commuters in coordinated manner with other transport providers. A land	Sinhala, Tamil and English	Formal meetings, written information, letters, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times

Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means	Specific needs
	owner of the KMTT site and will be key partner in the KMTT			
Utility service providers (electricity, water, telephones)	Ceylon Electricity Board, National Water Supply and Drainage Board, Sri Lanka Telecom, Dialog	Sinhala, Tamil and English	Formal meetings, written information, letters, email, telephone calls	<ul style="list-style-type: none"> • Advance notification for meetings and mutually agreed dates and times • Regular meetings between contractor, supervision consultant and PMU E&S staff, as laid out in the ESMP
Bus operators	A network of bus operators who operate both public and private buses from GSBS and will initially be relocated in to transitional sites and start operations with modern facilities after KMTT is completed	Sinhala and Tamil	Formal meetings, written information, letters, telephone calls, leaflets, notices	<ul style="list-style-type: none"> • Meetings to be convened through CPPTSA or SLTB • Printed material should be prepared in easy to understand simple language
Bus commuters (local and foreign)	People who use public transport via GSBS and KMTT in future	Sinhala, Tamil and English	Display screens, direction boards at main passenger dropping points (e.g. hospital, railway station etc.), hand bills distributed with newspapers, existing public addressing systems at railway station and CPPTSA, traffic wardens with uniform to disseminate the information and guide the commuters, open information counters at transitional sites, public addressing system in the initial stage, display of Information stickers in two languages in busses, special traffic police team to guide commuters especially women, mobile Apps, and radio channels	<ul style="list-style-type: none"> • Special attention to be paid to persons with disabilities, elderly and sick and women and girls • Conduct periodic user satisfaction surveys
Host/Local community	Service providers, settlements, and business operators	Sinhala, Tamil and English	Letters, posters, formal and informal meetings, leaflets	<ul style="list-style-type: none"> • Meetings and other events to be arranged on days convenient for the community.

Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means	Specific needs
	living in the surroundings of KMTT.			<ul style="list-style-type: none"> Meeting locations should be in close proximity to the settlements
Kandy General Hospital	Main Government health and medical institution in the central province. Will provide land space to link the Sky Walk of KMTT with the hospital premises.	Sinhala, Tamil and English	Formal meetings, written information, letters, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times
Kandy City Police	Overall in charge of Kandy city traffic management and road safety.	Sinhala, Tamil and English	Formal meetings, written information, letters, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times Meetings to be held periodically to update on project progress and seek inputs for the way forward
Divisional Secretary	The divisional level administrative authority that oversees all government functions including land management at the local level	Sinhala, Tamil and English	Formal meetings, letters, reports, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times Meetings to be held periodically to update on project progress and seek inputs for the way forward
Central Environmental Authority , Geological Survey and Mines Bureau	Regulatory authority for approving dumping sites, Borrow sites, Mining and transport Licenses	Sinhala, Tamil and English	Formal meetings, letters, reports, e-mail, telephone calls	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times Regular meetings as per the requirements of project, including ESMP and other environmental management plans
University of Moratuwa	Provides IT based solutions for KMTT operations and trainings and other inputs for traffic management.	Sinhala Tamil and English	Letter, reports, E- mail, telephone calls, formal and informal meetings	<ul style="list-style-type: none"> Advance notification for meetings and mutually agreed dates and times Regular meetings as per the requirements of project design
Jana thakshan (NGO performing the task of livelihood consultant to KMTT)	An NGO specialized in livelihood development and hired bySCDP as a consultant to provide livelihood support to APs of the project	Sinhala Tamil and English	Letters, reports, e-mail, telephone calls, review meetings, formal and informal meetings	<ul style="list-style-type: none"> Regular meetings as per the RAP and ESCP

Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means	Specific needs
Local and provincial level political authority	Elected members of the KMC and the Provincial Government who have an interest on KMTT	Sinhala Tamil and English	Formal meetings, letters, reports, telephone calls	<ul style="list-style-type: none"> • Advance notification for meetings and mutually agreed dates and times • Meetings to be held periodically to update on project progress and seek inputs for the way forward
Religious institutions in Kandy	Main temples of two chapters of Buddhism in Sri Lanka and the temple of tooth relic which has strong influence at all levels of Government and community, and other religious places belonging to Christians, Catholics, Muslims and Hindus	Sinhala, Tamil and English	Formal meetings, letters, reports	<ul style="list-style-type: none"> • Advance notification for meetings and mutually agreed dates and times • Meetings to be held periodically to update on project progress and seek inputs for the way forward • Meetings to be held at the venue of these religious institutions
Commercial Banks	Commercial Banks that operate in the Kandy city	Sinhala Tamil and English	Formal meetings, letters, reports, e- mail, telephone calls	<ul style="list-style-type: none"> • Advance notification for meetings and mutually agreed dates and times • Separate meetings to be organized with the LRP Consultant and PMU E&S staff
Chamber of Commerce	An agency that promotes entrepreneurship by providing training to the business community and linking them with emerging markets.	Sinhala Tamil and English	Formal meetings, letters, reports, e- mail, telephone calls	<ul style="list-style-type: none"> • Advance notification for meetings and mutually agreed dates and times • Separate meetings to be organized with the LRP Consultant and PMU E&S staff
Press and Media	Government owned and private sector electronic and print media that provide information to general public.	Sinhala, Tamil and English	Letters, reports, e-mail, telephone calls, meetings, discussions, press conferences	<ul style="list-style-type: none"> • To be arranged at regular intervals
Contractors	Company/ies that would be entrusted with the construction responsibility of KMTT and other ancillary facilities	Sinhala Tamil and English	Letters, reports, e-mail, telephone calls, site inspections, review meetings	<ul style="list-style-type: none"> • Meetings to be organized at the site or at the PMU office as per the ESCP and other documents prepared for the project
Supervision consultants	Consultancy firm that provides supervision inputs to the contractor.	Sinhala, Tamil and English	Letters, reports, e-mail, telephone calls, meetings	<ul style="list-style-type: none"> • Meetings to be organized at the site or at the PMU office as per the ESCP and other documents prepared for the project

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Purpose and Timing of Stakeholder Engagement Program

The specific objectives of the stakeholder engagement program are as follows.

- To facilitate the uninterrupted implementation of the KMTT project and its timely completion
- To seek public cooperation and their inputs to project implementation and grievance redress
- To develop collaborative plans and actions for the effective, efficient and sustainable implementation and management of the project
- To mainstream the project, and to build a sense of ownership among stakeholders
- To identify capacity gaps of different stakeholders and to address those gaps
- To design the overall regulatory framework for KMTT with multi-stakeholder participation
- To obtain necessary approvals in line with the national frameworks ensuring timely implementation and effective monitoring at the implementation stage

Information disclosure and consultation processes will continue with APs, other interested parties and vulnerable groups during (i) project preparation, (ii) project implementation/construction and (iii) project operational phases. A variety of methods such as group consultations, individual consultations and interviews and communication through printed and electronic media, appropriate to the target audience, will be used for information disclosure and consultation.

5.2 Information Disclosure

During the due diligence conducted for the project as part of resettlement planning and implementation, information related to preliminary engineering designs of the project, land requirements, potential impacts of the project, both positive and negative and direct and indirect, entitlements of the affected parties, grievance redress procedures, deadlines for vacating the premises and planned dates of the commencement of civil works were shared with affected persons and other stakeholders during consultations. A copy of the resettlement plan has been already disclosed on WB's website as well as on the website of SCDP. Current documents will be redisclosed on Ministry of Highways Roads Development Authority's website as well as KMTT website. All amended documents will be disclosed on Ministry of Highways-Road Development Authority's website as well as WB website. Information disclosure will continue to the project's construction and operational periods and the information cell established closer to the KMTT construction site will serve as the major hub for information dissemination. Furthermore, this cell will also function as a focal point for receiving grievances/complaints from any affected parties. Brochures, posters, stickers and video clips containing relevant information will be printed in Sinhala and Tamil and they will be made available/displayed at places easily accessible to affected persons and other interested parties. The project will also hire the services of a communication specialist/firm to design, plan and implement a robust information and communication program for the project. A dedicated website for KMTT will be established. Translations of the following documents in Sinhala and Tamil will also be made available to the public through this website. They will also be placed at the KMTT office in Kandy and at the information cell for public perusal. Availability of project related documents for public comments will be notified via newspapers, mobile technology (Apps), and display boards.¹⁰

¹⁰All ESF documents will be amended to reflect Ministry of Highways ownership and implementation arrangements, and redisclosed in-country, on PMU website(s), and on WB website.

- Resettlement Action Plan (RAP)
- Environment and Social Impact Assessment (ESIA)
- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Labor Management Procedures (LMP)
- Environment and Social Management Plan (ESMP)
- Health and Safety Plan
- Project implementation progress reports
- Minutes of consultation meetings
- Project monitoring reports

Table 6 provides a plan for information disclosure during project preparatory, implementation and operational periods.

Table 6: Information disclosure plan

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Percentage reached	Responsibility
PROJECT PLANNING AND PREPARATION PHASE					
Project related documents -RAP, ESIA, ESCP, SEP, LMP, ESMP etc. and project's progress reports, minutes of consultations	Display of the relevant reports. Public to be informed of the availability of reports via newspaper advertisements published in Sinhala, Tamil and English languages and public notices	Reports to be placed at PMU, Information Cell, KMC and DS office and public notices displayed at KMC, railway station, information cell, post-office and GN and DS offices for 3 months prior to the commencement of construction works and will continue throughout construction period	APs, other interested parties and vulnerable groups	100%	SEP manager
Transitional arrangements and allocation of bus routes to new locations	Display screens, banners, posters, public address system, posters/stickers displayed inside buses, local radio channel (<i>Kandurata Sewaya</i>), mobile apps and help desks and commuter care wardens with uniform (to help the vulnerable)	Posters displayed at the information cell, transitional bus operating sites, CPPTSA and SLTB offices, railway station one month prior to the commencement of transitional arrangements and continue for two months	Commuters, bus operators, general public and tourists, other interested agencies, mobile vendors and three wheeler operators	80% by posters, display boards, banners and posters displayed inside buses Public address systems and local radio channels cover the balance 20%	Manger CPPTSA, CSM, Kandy Railway Station and the Manager SLTB at GSBS
Traffic management plan	Stakeholder meetings, letters, sign boards, posters and public address systems,	Sign boards at traffic diversion points, and transitional terminals, one month before the	Commuters, general public, vehicle users, school	100% by sign boards, posters and public	Traffic police, KMC, and contractors

	mobile apps and local radio channel(<i>Kandurata Sevaya</i>)	implementation of the traffic management plan	children, employees/ workers	address systems	
Construction plan, construction method and possible impacts and employment opportunities for local communities	Stakeholder meetings and discussions and large display boards around the construction site	2 months prior to the commencement of construction work at GSBS and shifting of utility services	Communities (Samagi Mawatha, Suduhumpola, Deiyannawela) and business establishments located adjacent to KMTT site, SLR, Kandy General Hospital, KMC, CPRPTSA, SLTB	100%	Contractor and supervision consultant
Grievance redress mechanism including places to report sexual harassment, gender-based violence	Brochure and newspaper advertisements on GRM in Sinhala, Tamil and English, large display boards, and posters, social media, mobile phone apps	Brochure circulated among host community, and business establishments; display boards around construction site; posters displayed and brochures made available at information cell, transitional bus operating sites, railway station, GN and DS offices, KMC, CPPTSA & SLTB offices and awareness programs for construction workers from project preparatory stage to KMTT operation stage	Project affected parties, host communities, business establishments in the vicinity, commuters, general public, vulnerable groups and construction workers	100%	SEP team, GRM manager, project partner agencies, and contractor
Livelihood restoration plans and available support	Individual letters, home visits, and public notices	Public notices displayed at information cell, GN and DS offices from project's preparatory stage to KMTT operation stage	Project affected parties including the affected vulnerable persons	100%	SEP team, livelihood restoration consultants and contractor (for recruiting labor teams)
PROJECT IMPLEMENTATION/CONSTRUCTION PHASE					
Health and safety plan	Public awareness programs, display boards and posters	Periodic public meetings for host community, business establishments and schools in the vicinity, posters displayed at information cell, post-office, railway station, general hospital,	General public, host community, commuters, and school children	100%	Contractor, supervision consultant, SEP team, and project partner agencies

		CPPTSA and SLTB offices, and GN and DS offices throughout the construction period			
Business opportunities available at KMTT, client selection criteria, bidding procedures, fees payable by bidders, shop maintenance requirements etc.	Newspaper advertisements published in Sinhala, Tamil and English and printed brochures	Printed brochures placed at information cell, KMC, SLR, CPPTSA, SLTB and DS office 6 months prior to the commencement of KMTT operations	Business community and displaced business operators from GSBS	100%	KMTT management
PROJECT OPERATION PHASE					
KMTT's operational modalities, and facilities available	Television programs, video clips on social media and display screens installed the Kandy city and posters displayed at public spaces	Two months prior to the commencement of KMTT operations	General public and commuters	100%	KMTT management, and SEP team
Bus operation arrangements and schedules	Display screens, printed bus schedules, posters, public address system, posters/stickers displayed inside buses, local radio channel (<i>Kandurata Sewaya</i>), mobile apps and help desks and commuter care wardens with uniform (to help the vulnerable)	Posters displayed at the information cell, transitional bus operating sites, CPPTSA and SLTB offices, railway station and printed bus schedules for circulation and placed at transitional sites, railway station and KMTT main terminal two months prior to the commencement of KMTT operations and continue for 3 months since the commencement of KMTT operations	Commuters, bus operators, general public and tourists, and three wheeler operators	80% by posters, display screens, and posters and stickers displayed inside buses Public address systems and local radio channels cover the balance 20%	KMTT management

5.3 Proposed Strategy for Stakeholder Engagement

During resettlement planning and implementation phases, project affected parties were extensively consulted to identify their resettlement options, as well as to develop their entitlement matrix and the livelihood restoration plan. The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, in order to elicit their views and feedback. Individual and group meetings, mini-workshops, surveys, social media etc. will be used to facilitate the consultations.

- Commuter satisfaction on transitional bus operating sites and arrangements
- Operational plan of the bus services and their timeframes
- Final engineering design of KMTT]
- Green building initiatives at KMTT

- Improvements for pedestrian circulation and access to railway station
- Plans for Transit-oriented-Development (ToD)
- Road safety improvement
- Education/campaign to the public
- Gender and personal safety aspects
- Climate hazard prevention/adaption
- Parking facilities for long distance buses and touch-and-go systems for local buses
- Facilities to be established at KMTT for the benefit of commuter population
- Issues related to vulnerable groups
- Terms and conditions governing tendering process of the business units to be constructed within KMTT
- Traffic management plan during KMTT construction
- Construction plan, methods and time frames of the civil works of KMTT

Table 7 presents the strategy for stakeholder engagement.

Table 7: Strategy for stakeholder engagement

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
PROJECT PLANNING AND PREPARATORY PHASE				
KMC, CPPTSA, SLR, SLTB and host community	Review of final engineering design of KMTT	Power point presentations of the design at stakeholder meetings and consultations to receive feedback	Two sessions with stakeholder group to be held at KMC (one for the initial presentation and the second to present the updated design)and 4 meetings with host community in pre-arranged suitable locations to receive their feedback	Min. of Highways – Road Development Authority, , KMTT-PMU/SEP team and KMTT design consultant
KMC, CPPTSA, SLR, SLTB, bus operators, city traffic police, commuters	Review of the plan for bus operations at transitional sites and transition-oriented development	Meetings and consultations	At CPPTSA office 2 months prior to the commencement of bus operations at transitional sites	CPPTSA, SLTB, KMC and city police
Commuters, tourists, religious and educational institutions, political authorities, women and girls, NGOs, city police, professional and academic institutions and media	Inputs to designing and developing public educational and awareness programs and communication tools, methods and materials	Individual and group consultations	At pre-arranged and invited meetings of immediate effect	SEP team, and project partner agencies

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
Vulnerable and disadvantaged groups and government and private agencies working with them and bus operators	Identification of Issues related to vulnerable and disadvantaged groups and inputs to plan remedial measures at transitional sites and subsequently at KMTT	Through customer care attendants/traffic wardens placed at transitional bus operating sites and subsequently at KMTT, site visits and social media	At transitional bus operating sites and KMTT terminals and Skywalk and at pre-arranged and invited meetings with immediate effect and quarterly review meetings with stakeholders	SEP team, CPPTSA, SLTB
Commuters, women and girls, city police, host/local community, vulnerable groups, bus operators and women NGOs	Inputs for gender and personal safety development aspects at transitional sites and KMTT	FGDs and meetings, social media	At pre-arranged and invited meetings followed by quarterly meetings of stakeholders	SEP team, city police, CPPTSA, SLTB and SLR
KMC, city police, general hospital, SLR, RDA, host community, commuters and vulnerable groups	Inputs for improvements to pedestrian circulation and access to railway station	Discussions and meetings, joint field inspections	Prior to the commencement of construction work followed by quarterly review meetings and consultations with stakeholders	KMC, city police, and SLR
Commuters, city police, KMC, general hospital, SLR, host/Local community, vulnerable groups, CPPTSA, SLTB	Review of traffic management plan during KMTT construction	Discussions and meetings, joint field inspections	Prior to the commencement of construction work followed by quarterly review meetings and consultations with stakeholders	City police, KMC and RDA
PROJECT IMPLEMENTATION/CONSTRUCTION PHASE				
Commuters, tourists, school children, women and girls and religious institutions	Survey on commuter satisfaction on transitional bus operating sites and their facilities, and gender and safety	Interviews and user satisfaction surveys	One month after implementation of the transitional plan, followed by once in two months in the first six months, and thereafter bi-annually at transitional bus operating sites	SEP Team, CPPTSA and SLTB
KMC, City police, commuters, vehicle users, RDA, school children, host/local community, vulnerable groups	Inputs for road safety improvement	Discussions and meetings, joint field inspections	At pre-arranged and invited quarterly meetings of stakeholders	KMC, city police, RDA

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
General public, commuters, tourists, school children, women and girls and religious institutions	Survey on public satisfaction on traffic management plan, and road safety	Interviews, user satisfaction surveys and social media	Quarterly, in the project impact area	SEP Team, and city police
KMC, CPPTSA, SLTB, general hospital, SLR, city police, host/local community	Review of construction plan, methods and time frames of the civil works of KMTT	At pre-arranged and invited meetings of stakeholders	Prior to the commencement of KMTT construction	Contractor, supervision consultant, KMC, CPPTSA, and SLTB
PROJECT OPERATION PHASE				
KMC, CPPTSA, SLTB, SLR, Commuters, bus operators, and city police	Review and monitor the bus and railway operations plan and their timeframes at KMTT	At pre-arranged and invited meetings of stakeholders	Quarterly	CPPTSA, SLTB and SLR
Bus operators, SLTB, CPPTSA, KMC, host community and three-wheeler operators	Review of parking facilities for long distance buses and touch-and-go systems for local buses and three-wheelers	At pre-arranged and invited meetings of stakeholders	One month prior to the commencement of KMTT operations.	CPPTSA, SLTB and KMC
Displaced business operators and renters at GSBS, other business community, KMC, SLR, CPPTSA and SLTB	Review of the business plan of KMTT	At pre-arranged and invited meetings of stakeholders	During KMTT construction period	KMTT management and SEP team

5.4 Proposed Strategy/Differentiated Measures to Include the Views of and Encourage Participation by Vulnerable Groups

Table 8 presents a strategy for the engagement of vulnerable and disadvantaged groups in consultative processes and to elicit their views and suggestions, specifically on aspects listed under section 5.3 above.

Table 8: Strategy for the engagement of vulnerable and disadvantaged groups

Target Group	Strategy
Displaced vulnerable APs in GSBS	<ul style="list-style-type: none"> • Home visits and individual consultations • Pre-arranged group consultations in close proximity to their residential dwellings • Information communication via the care-givers of vulnerable APs
Women construction workers	<ul style="list-style-type: none"> • Individual/group consultations at construction site with prior permission from the contractor • Provide access to project-based GRM and/or workers' GRM • Engagement of officers from labor department to consult and monitor

Poor children & adolescents who seek employment in construction work	<ul style="list-style-type: none"> • Awareness raising programs targeting the poor children and adolescents on high risk behaviors associated with construction work • Engagement with resource organizations that work with the target groups to conduct consultations
Street Beggars	<ul style="list-style-type: none"> • One to one discussions and consultations
Poor women and children who will engage in high risk behaviors	<ul style="list-style-type: none"> • Individual and group consultations and awareness raising programs with videos and printed material • Deploy a dedicated female liaison officer to the Information cell • Engage law enforcement agencies in awareness raising programs and monitoring
Elderly and disabled persons	<ul style="list-style-type: none"> • Individual and group consultations • Deploy traffic wardens at bus operating sites to provide information and guidance
Poor commuters	<ul style="list-style-type: none"> • Deploy a team of commuter care wardens with uniforms to disseminate information, receive feedback and guide the commuters

5.5 Public Comments and Feedback/Reporting to Stakeholders

Public was given a period of 3 weeks to review and submit their comments on the disclosed documents. Such submissions could be submitted either verbally or in writing. Written submission was channeled through multiple access points such as KMTT’s website, staff of KMTT, or by mail to KMTT office in Kandy. Verbal communications either via telephone or in person will be recorded by a member of the social and environmental team of KMTT. All comments received by the project were reviewed by KMTT’s PMU at its monthly progress review meetings, and any decisions made based on public comments communicated to the relevant stakeholders within two days after the review meetings. If the project had not been able to make any decision in response to public comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

6. ROLES, RESPONSIBILITIES AND RESOURCES FOR STAKEHOLDER ENGAGEMENT

6.1 Resources

The PMU of KMTT will appoint a core team led by a dedicated manager for the overall coordination, implementation and monitoring of the Stakeholder Engagement Plan (SEP). He/she will be assisted by:

- (i) a communications specialist (consultant),
- (ii) a social development specialist, resettlement/livelihood restoration specialist, environmental specialist, and liaison specialist responsible for information, communication, and consultations,
- (iii) a manager for coordination of the work of the grievance redress mechanism (GRM),and
- (iv) a monitoring and documentation officer

Additionally, the core team will closely associate with project’s key partner agencies such as KMC, CPPTSA, SLTB, SLR, project affected parties, bus operators, media and host community and contractors and supervision consultants to encourage their participation in the implementation of the SEP. The roles and responsibilities of these different stakeholders are described in Table 9.

Table 9: Responsibilities of key stakeholders in SEP implementation

Stakeholder	Responsibilities
KMTT core team for SEP implementation	<ul style="list-style-type: none"> • Overall coordination and implementation of the SEP • Provide adequate financial resources for SEP implementation • Coordinate and collaborate with project partner agencies, other stakeholders, contractors and supervision consultants and ensure their proactive participation in SEP implementation • Maintain regular communications with all relevant stakeholders • Design and produce relevant communication tools and materials • Organize and conduct or facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc. • Ensure efficient functioning of the GRM and manage the grievance resolution processes • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties • Monitor and report on the progress of SEP implementation including operations of the GRM • Undertake periodic reviews of SEP and update and disclose whenever necessary
Project's partner agencies <ul style="list-style-type: none"> • KMC • CPPTSA • SLTB • SLR 	<ul style="list-style-type: none"> • Devise appropriate methods and tools to disseminate information on bus operation arrangements and parking facilities • Disseminate information on bus operation and parking arrangements and schedules at transitional sites, and subsequently at KMTT • Disseminate information on railway operations since the operations of KMTT • Assist traffic police to raise public awareness on traffic arrangements during KMTT construction period • Conduct stakeholder consultations on road safety improvements, pedestrian movements and accesses, safety aspects of women and girls and commuter satisfaction on bus operations and facilities • Launch a public awareness campaign on the operational arrangements and facilities available at KMTT • Participate in the resolution of public grievances • Ensure that stakeholder engagement activities included in the ESMP, health and safety plans are effectively implemented • Provide feedback on project related documents disclosed for public scrutiny • Monitor and evaluate the information disclosure programs and stakeholder consultations
Divisional Secretary	<ul style="list-style-type: none"> • Grant permission and provide space in the office notice boards to display relevant posters and circulate brochures • Monitor the status and adequacy of public information dissemination • Obtain sufficient information on project's progress, and report to the higher level administration and political authority • Participate in the grievance resolution processes • Monitor that labor management procedures included in the LMP are effectively enforced • Provide feedback on project related documents disclosed for public scrutiny
Project affected parties	<ul style="list-style-type: none"> • Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Use GRM to report grievances and complaints and ensure their satisfactory resolutions • Assist the relevant authorities to develop and implement appropriate mitigation

	<p>measures</p> <ul style="list-style-type: none"> • Participate and support the implementation of stakeholder engagement activities in the SEP, ESMP, LMP etc. • Provide feedback on project related documents disclosed for public scrutiny
Bus operators	<ul style="list-style-type: none"> • Participate in the consultations and provide inputs to plan bus operating arrangements • Assist CPPTSA and SLTB to conduct information dissemination programs on bus operations and available facilities • Inform/make aware of the bus workers on new bus operating arrangements and ensure their compliance • Participate in all training and awareness raising programs conducted by CPPTSA and the project • Support the implementation of health and safety plans and safety plans for women and girls • Provide feedback on project related documents disclosed for public scrutiny
Bus commuters	<ul style="list-style-type: none"> • Provide feedback on information dissemination programs • Participate in commuter consultations and surveys • Report grievances and concerns to the GRM • Support the relevant agencies to implement health and safety plans, safety plans for women and girls, pedestrian circulation plans and ESMP • Provide feedback on project related documents disclosed for public scrutiny
Contractors and Supervision Consultants	<ul style="list-style-type: none"> • Conduct public awareness programs to inform construction plan, construction methods and time frames for civil works of KMTT and potential construction related impacts • Conduct public awareness programs on health and safety plans • Conduct awareness programs for construction workers on health and safety arrangements, labor management procedures, and avoidance of deployment of child labor, sexual harassment and exploitation, drug and alcohol abuse and gender-based violence • Establish a separate GRM for workers to address their grievances and complaints • Comply with the implementation of LMP • Participate in the grievance resolution processes, specifically in addressing issues related to construction impacts • Provide feedback on project related documents disclosed for public scrutiny • Monitor and evaluate the information disclosure programs and stakeholder consultations including workers' GRM
Media	<ul style="list-style-type: none"> • Assist the project and partner agencies in their information dissemination endeavors including to inform the strategic importance of KMTT • Assist the project to sustain transparency and anti-corruption measures throughout project implementation and its operations • Assist the project affected parties to raise their grievances and concerns with the relevant agencies • Contribute to programs that aim at behavioral and attitudinal changes among bus commuters and general public • Provide feedback on project related documents disclosed for public scrutiny
Host/Local community	<ul style="list-style-type: none"> • Participate in consultations and information disclosure programs • Provide feedback on project related documents disclosed for public scrutiny • Use GRM to report any grievances and complaints

6.2 Estimated Budget

The costs associated with the implementation of the SEP will be provided by the Ministry of Highways – Road Development Authority. A budget for SEP implementation over a period of 5 years is presented in Table 10. The project will review the SEP every six months to determine whether any changes to stakeholder classification or engagement are required. If any significant changes were observed, the SEP will be updated and disclosed, and the budget will be revised accordingly.

Table 10: Estimated budget for stakeholder engagement plan (5 years)

No	Activity	No. Units	Unit cost (SLRs)	No. Months	Total Amount (SLRs)	
					In SLRs	In USD (\$1 = SLRs 180/-)
1	PERSONNEL					
1.1	SEP Manager	1	200,000	30	6,000,000	33,333
1.2	GRM Manager	1	200,000	30	6,000,000	33,333
1.3	Communications Specialist (consultant)	1	250,000	15	3,750,000	20,833
1.4	Social development specialist /Liaison officer	2	100,000	40	8,000,000	44,444
1.5	Resettlement/ Livelihood Restoration Specialist	1	100,000	30	3,000,000	16,667
2	Information disclosure					
2.1	Development of communication tools, methods and materials (brochures, leaflets, information booklets, posters, display boards, websites etc.)	-	Lump sum		2,500,000	13,889
2.2	Newspaper advertisements (in three languages), radio announcements, TV programs etc.		Lump sum		2,500,000	13,889
2.3	Circulation and distribution (mailing, handing over)		15,000	60	900,000	5,000
2.4	Awareness raising programs, resources & resource persons	1	20,000	60	1,200,000	6,667
2.5	Deployment of commuter care wardens	2	40,000	36	2,880,000	16,000
2.6	Communication and coordination/facilitation (telephone, e-mail)	1	5,000	60	300,000	1,667
3	Stakeholder engagements					
3.1	Meetings/workshops/FGDs (hiring of venues, refreshments etc.)	2	10,000	60	1,200,000	6,667
3.2	Surveys (questionnaire design, printing, questionnaire administration, data processing and analysis etc.)	6	100,000	-	600,000	3,333

3.3	Individual and group consultations	1	5,000	60	300,000	1,667
3.4	Logistical support for vulnerable groups for attending consultations		Lump sum		500,000	2,778
3.5	Communication and coordination/facilitation (telephone, e-mail)	1	5,000	60	300,000	1,667
3.6	Documentation of stakeholder activities	1	25,000	10	250,000	1,389
4	Grievance redress					
4.1	Meetings, documentation and record keeping/databases	1	5000	60	300,000	1,667
4.2	Logistics for meetings	1	15,000	60	900,000	5,000
4.3	Communications with complainants and other stakeholders	1	3,000	60	180,000	1,000
4.4	GRM monitoring and reporting	1	2,500	60	150,000	833
5	SEP Monitoring, evaluation, documentation and reporting					
5.1	Internal monitoring	1	5,000	60	300,000	1,667
5.2	Third party monitoring	20	300,000	-	6,000,000	33,333
5.3	Data storage and analysis	1	2,500	60	150,000	833
5.4	Report preparation	5	100,000	-	500,000	2,778
6	Administrative costs					
6.1	Transport	1	120,000	60	7,200,000	40,000
6.2	Communications	1	5,000	60	300,000	1,667
6.3	Computers	2	200,000	-	400,000	2,222
6.4	Utilities	1	20,000	60	1,200,000	6,667
6.5	Other		Lump Sum		500,000	2,778
Total					58,260,000	324,000

7. GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the project, either due to the actions of the KMTT staff or the contractor/sub-contractors employed by KMTT, and from affected communities and external stakeholders. A separate mechanism will be in place to address the grievances of workers. The KMTT's PMU will be responsible for managing the GRM, but many of the grievances on the Project will likely relate to the actions of the Contractor and so will need to be resolved by the Contractor. KMTT with the support of the supervision consultant will administer the GRM process deciding whether they or the Contractor is responsible for addressing the grievances and accordingly determine the best course of action to resolve the grievance. The supervision consultant will support KMTT to monitor grievance resolution being undertaken by the contractor. Further, the project affected persons as well as other interested parties will be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and

through booklets and information brochures during consultation meetings and other stakeholder engagement activities.

7.1 Scope of the GRM

The impacts of the KMTT Project may raise grievances and complaints on the part of affected persons in relation to: (i) economic displacement from the existing GSBS; (ii) construction-related damages; (iii) environmental impacts; (iv) direct and/or indirect social impacts; (v) procurement, contract management and contractor performance; (vi) quality of transport services; (vii) operations and maintenance of the terminal; (viii) safety and public access issues; (ix) gender-based violence, including sexual harassment in the buses and trains.

Since the preparation of KMTT was initiated under SCDP, there is already an existing three-tiered grievance redress mechanism in place that has been functional. Thus far, the impacts of the KMTT project had caused a number of affected persons to raise numerous grievances and complaints. They include: the exclusion of the APs/claimants from eligibility lists, non-availability of documentary evidence in support of their claims, disputes related to occupancy of business premises, disputes concerning valuation of properties and other assets and inadequate compensation etc. (See RAP Audit for more details on the complaints and their resolution). Besides these, relocation of APs may also lead to a range of issues such as non-availability of alternate business premises, difficulties related to reconstruction of business structures, restrictions imposed by regulatory authorities, lack of access to services such as water, electricity, sanitation etc., which too will have to be managed by the Project. It is anticipated that people will report more grievances and complaints during civil construction works of the project such as problems associated with contract management and contractor performance, damages to public and private properties, people's concerns over their personal safety; various inconveniences to the general public such as access difficulties, restrictions to public places, disturbances resulting from noise and dust, and issues related to labour influx such as conduct of laborers, gender-based violence, etc.

Therefore, the Project will further strengthen its existing grievance redress mechanism (GRM) to be able to address issues that go beyond the implementation of RAP. The GRM of KMTT will be available for project stakeholders including project affected persons (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), to submit complaints/grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences. Moreover, it will ensure its transparency, efficiency and accountability in grievance handling and responding while winning the confidence of the complainants. The GRM will endeavor to resolve the grievances locally, and to avoid lengthy court procedures. The GRM will be managed and coordinated by the PMU to be set up for KMTT. A senior officer of the PMU will be designated as GRM manager.

7.2 GRM Structure/Architecture

The project has established a three-tier GRM. The GRM will function throughout the life cycle of the project implementation. The PMU will ensure adequate female representation and participation in the composition of the different GRCs.

7.2.1 Site Level GRM

Level 1 of the GRM will be at the KMTT site in Kandy. At this level, there will be a dedicated social development officer (SDO) appointed by KMTT for grievance handling and consultations. In case of grievances that are urgent and minor, aggrieved parties can easily approach the SDO either in person or via telephone. Contact phone numbers of the SDO will be posted at all construction sites at visible locations. The SDO will be based at the KMTT office in Kandy located Road Development Authority in Kandy. The SDO will record the complaint, name of the complainant and the date of complaint.

Upon receiving the complaints, the SDO (with prior communication and consent of the GRM manager) will communicate with the relevant persons and agencies implicated in the complaint and will try to reach an amicable settlement within a period of one week, failing which the complaint will be forwarded to the GRM manager. Reports on the grievances resolved at site level describing the steps taken to resolve them and the actions agreed will be submitted by SDO to the GRM manager. Similar reports on cases that could not be resolved at the site level with reasons for their non-resolution will also be forwarded to the GRM manager by the SDO. Grievances that cannot be resolved at the site-level GRM (Level 1), or else if the affected persons were dissatisfied with the Level 1 resolution, the complaint will be passed on to the Local Grievance Redress Committee (Level 2) by the GRM manager.

7.2.2 Local Grievance Redress Committee (LGRC)

Level 2 of the GRM will be the Local Grievance Redress Committee (LGRC) established at the PMU in Kandy chaired by the Divisional Secretary of the Ganagawata Korale Divisional Secretariat division. The rest of the members of the GRC will include (i) a representative from CPPTSA; (ii) a representative of SLR (based in Kandy); (iii) a representative from SLTB (based in Kandy); (iv) KMC commissioner or his nominee; (v) project engineer of KMTT; (vi) a representative of the consultant; (vii) a representative of the aggrieved party (the representative will be a female if the aggrieved party is a female); (viii) GRM manager; and (ix) the SDO handling grievances at Level 1.

The LGRC can convene the affected person to explain his/her grievance at its meeting. LGRC will also consult the relevant technical experts and carry out site visits, when required. During the committee deliberations, LGRC will clarify the issues involved and will seek to reach a settlement acceptable to both the affected person and the PMU within a period of two weeks. Level 2 GRC will reach a settlement through consensus among its membership, failing which the decision may be taken on a majority vote. The GRC will conclude its proceedings within a period of two weeks since the submission of the grievance to the LGRC. If an agreement or resolution is reached, the key points of the agreement/resolution will be summarized, documented, and signed by both the affected person and the members of the LGRC.

Grievances that cannot be resolved at GRM Level 2, or else if the affected persons were dissatisfied with the Level 2 resolution, the grievance will be submitted to the Independent Grievance Panel (IGP) for resolution by the GRM manager.

7.2.3 Independent Grievance Panel (IGP)

Level 3 of the GRM is the Independent Grievance Panel (IGP) originally established at the Ministry of Urban Development, Water Supply and Housing Facilities and now overseen by Ministry of Highways.¹¹

¹¹Previously, the implementing agency was the Ministry of Megapolis and Western Development (MoMWD) in Colombo.

The IGP comprises representatives from the Land Ministry, Department of Valuation, a lawyer, a retired senior government officer, and a representative of a recognized civil society organization and/or a person representing the APs. IGP will deliver its decision on the grievances reported within a period of one month since the submission of the case to IGP.

7.3 GRM Intake Channels

The GRM will establish multiple channels through which citizens/beneficiaries/PAPs can make complaints regarding project funded activities. Complaints can be submitted either verbally or in written form using a variety of communication tools such as formal letters/petitions, telephone, emails, SMS, on-line entry system etc. For specific issues concerning women such as those related to gender-based violence etc., a contact point of a focal female officer will also be posted at PMU and at the Information Cell of KMTT located in the Kandy Railway Station premises for accepting the complaints. Moreover, there will be printed standard formats made available at different focal points to receive grievances which can be accessed by the complainants to record their grievances. If project stakeholders/affected parties provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels.

7.3.1 Focal points for reporting grievances

Using any of the aforementioned intake methods, aggrieved parties can report/submit their complaints to several focal points that will be established by the project to receive the complaints. The focal points will include the following; (i) PMU of KMTT; (ii) a project officer of the Information Cell of KMTT located in the Kandy Railway Station premises and in adjacent to the KMTT construction site; and (iii) site office of the contractor/supervision consultant. Log books will be maintained at each focal point to record complaints/grievances. The Information Cell is kept open for five days a week from 9.00 a.m. to 4.00 p.m. Names of the contact persons at each focal point together with their contact phone numbers, and email addresses will be posted at visible locations of the construction site and other strategic locations in Kandy. In addition, feedback boxes will be placed at project's construction site, contractor's office, Information Cell of KMTT, transitional bus operating sites, DS office, and GN office.

7.4 Grievance Registry, Referral, Resolution and Appeal Process

7.4.1 Grievances registration

The focal points that receive the complaints either in written or verbal form will register those complaints using a standard format maintained at each focal point. Complaint registration will include details of (i) date of receiving the complaint, (ii) name and address of the complainant, (iii) copy of the complaint if a written submission, and (iv) a brief note if a telephone message. PMU will introduce a standard format for recording/registering the complaints received by the focal points. Having recorded the relevant information, focal points will forward the relevant documents along with a copy of the registering format to the GRM manager at PMU either on the same day or the following day.

7.4.2 Grievance sorting and categorization

Upon receipt of any complaint either directly or from focal persons, the GRM manager will screen and categorize the complaints. Complaints can be classified into the following categories.

1. Grievances related to land acquisition & property valuation, inadequate compensation & payment delays, loss of livelihoods & incomes, resettlement related issues
2. Environment related issues – impacts on natural resources, dust, noise, vibration, traffic congestion and access disturbances
3. Technical issues – design errors, technical deviations, and adverse impacts
4. Contract violations, non-compliance of the contractor and construction related impacts including labor management
5. Violation of policies, laws and regulations, guidelines and procedures of the government and the donor agency
6. Misuse of funds/lack of transparency, or other financial management concerns
7. Abuse of power/intervention by project or government officials
8. Community social issues, gender-based violence, discrimination
9. Requests for information
10. Suggestions
11. Appreciation

7.4.3 Screening, acknowledgement and closure of grievances

The GRM manager will respond to the complainant acknowledging the grievance and explaining the course of action to be taken and its approximate time frame for resolution. This acknowledgement and notification will be sent to the complainant within three days of receiving the complaint by the GRM manager. The manager can use a standard format for this notification.

In consultation with Project Director (PD), the GRM manager will review and determine the (i) eligibility of the complaint for hearing by the GRM; (ii) the level at which the complaint should be referred to for resolution (i.e. site level SDO, LGRC level or IGP level); (iii) the timeframe within which the complaint should be resolved. Having determined the above, GRM manager will refer the complaints to the appropriate GRC level. Such referrals should be completed within a maximum of 4 working days of receiving the complaint. If complaints take longer than the stipulated period to handle, weekly updates will be provided to the complainant in writing indicating the reasons for delay. Grievances that do not meet the eligibility criteria to be investigated in the GRM will be notified to the aggrieved party/complainant by the GRM manager.

Decisions of the different GRCs (i.e., site level SDO, LGRC, IGP), will also be formally communicated to the complainants by the GRM manager. A grievance will be considered 'resolved' or 'closed' when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented, the PMU will also request feedback from the complainant as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the action taken.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the project's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the

complainant advised of the situation. The project will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

7.4.4 Appeal process

The GRM established under the project will not impede access to the legal system. Affected persons can leave the GRM at any point, if they are dissatisfied with the process and the decisions of the GRM, and resort to legal action through the country's judiciary system at any time. They can also submit their grievances to World Bank Group's Grievance Redress Service (GRS) and the Inspection Panel.

7.4.5 World Bank Group's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank Group-supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank Group's Grievance Redress Service (GRS) (<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project-affected communities and individuals may also submit their complaints to the World Bank Group's independent Inspection Panel (<https://www.inspectionpanel.org>), which determines whether harm occurred, or could occur, as a result of World Bank Group noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention and Bank Management has been given an opportunity to respond.

7.5 Awareness Raising on GRM

Information about the grievance handling system will be distributed to all beneficiaries and project affected people through regular information channels used by the project including initiating meetings at the start of the project, public consultations held, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online. The social and environmental safeguards team of KMTT/ will play a lead role in awareness building and information sharing on the GRM. Moreover, the stakeholder engagement program of the project will be used by the PMU to encourage the use of the GRM and publish information on complaints received and resolved. The campaigns will also use local media (e.g. TV, newspaper, radio). When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. Information to be disseminated will include the scope of the GRM, specific locations where GRCs are established and their focal points for receiving grievances, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints. Furthermore, the project will provide orientation and training to the members of the GRM on effective grievance handling procedures.

7.6 Monitoring and Reporting

The PMU will assess the functioning of the GRM and undertake spot checks during regular supervision visits. The PMU will be responsible for regular reporting of the GRM status including those grievances received, resolved, and pending. The GRM manager will (i) ensure accurate entry of GRM data into the data base; (ii) produce monthly/quarterly reports of GRM results including any suggestions and

questions, to the project team and the management; and (iii) review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

The quarterly and annual progress reports will include updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc.).
- Quantitative data on the number of complaints received, the number that were eligible, and the number resolved
- Qualitative data on the type of complaints and answers provided, issues that are unresolved
- Time taken to resolve complaints
- Number of grievances resolved at the lowest level, and raised/appealed to higher levels.
- Summary of resolutions/decisions made
- Satisfaction with the action taken
- Any particular issues faced with the procedures/staffing or use
- Factors that may be affecting the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

7.6.1 Reporting to World Bank

The World Bank will be kept informed and where necessary consulted on World Bank requirements, during the process of grievance resolution, and also on the outcome of the process. A summary sheet of all complaints received and resolved will be shared with the World Bank Task Team. Any complaint or incident categorized as high risk should be reported to the World Bank Task Team immediately.

7.7 GRM Contact Information

Aggrieved parties can approach and use the following contact/s for any inquiries regarding their grievances/complaints and feedback.

Description	Contact Details
Project Implementing Agency:	Ministry of Highways – Road Development Authority
Project:	Kandy Multimodal Transport Development Project
Contact person/s:	
Address:	Road Development Authority
e-mail:	
Website:	
Telephone:	

7.8 Workers’ Grievance Redress Mechanism

The main Contractor of KMTT has the contractual obligation to establish a separate GRM to address the grievances and complaints reported by the construction workers including the sub-contractors. Grievances/complaints of the workers will be reported to either the site office of the contractor or the office of the supervision consultant. Additionally, a complaint/suggestion box will be placed within the construction site. A focal point to receive and register the grievances and complaints in each of the two offices will be designated, and their contact details will be displayed on the respective office notice boards as well as in appropriate places within the construction site. The availability of the W-GRM to

report grievances will be communicated to the workers during worker induction sessions, at periodic meetings of the workers, and through leaflets. The W-GRM will establish (i) clear procedures for reporting and registering grievances; (ii) stipulated time frames for grievance resolution; and (iii) a register to record and track timely resolution of grievances. The contractor is responsible to maintain transparency in GRM operations, secure the confidentiality of the complainants, and avoid any form of discrimination against complainants. The supervision consultant will monitor and report on the processes and outcomes of the grievance redress followed by the contractor.

8. MONITORING AND REPORTING

8.1 Involvement of Stakeholders in Monitoring Activities

The project will establish multiple mechanisms for monitor and evaluate the SEP implementation. They would include the following arrangements.

1. Overall monitoring and evaluation by the SEP implementation team of the KMTT-PMU
2. Engagement of the project implementing partners (CPPTSA, SLTB, KMC and SLR) to monitor and receive feedback from the relevant stakeholders on (i) the implementation of bus operating plans at transitional sites, and subsequently at KMTT; (ii) traffic management plan; (iii) health and safety plans including safety plans for women and girls; and (iv) engagement of stakeholders
3. Engagement of the project affected parties, vulnerable groups, host communities, and media to monitor and report on the adequacy and usefulness of (i) information disclosure programs; (ii) consultations; and (iii) stakeholder engagement activities via their participation in commuter surveys, individual/group consultations, and in the GRM.
4. Monitoring by a third party on the implementation of the SEP, and its compliance with ESS10. The third-party monitor will assess and evaluate both the process and the outcomes of SEP implementation and will recommend mitigation/corrective measures if any non-compliance was observed.

The project will use a variety of methods and tools for monitoring and evaluation. They will include review of project documents and progress reports, stakeholder interviews and group discussions, feedback surveys, site visits etc. SEP implementation team of KMTT-PMU will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations/meetings, public comments/feedback received for disclosed documents, informal feedback from commuters to commuter care wardens, decisions made, and reporting back to the stakeholders. If required, project will provide capacity building training for stakeholders who would be engaged in monitoring and evaluation processes. The following monitoring framework in Table 11 provides a set of indicators that could guide the monitoring processes.

Table 11: Monitoring Framework

No.	Monitoring Indicators	Methods	Timeframe	Responsibility
1.	No. APs, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly	SEP manager & team and project partners

No.	Monitoring Indicators	Methods	Timeframe	Responsibility
2.	Type of information shared/disclosed	Review of information material shared and their content	Quarterly	SEP manager & team and project partners
3.	Type of methods used for information dissemination and their effectiveness	Review of communication methods used, observations and feedback interviews and consultations with information recipients	Quarterly	SEP manager & team, project partners and third party monitor
4.	Accessibility to information and language used for communication	Records of persons who sought information; observations and feedback interviews and FGDs with stakeholders	Quarterly	SEP manager & team, project partners and third party monitor
5.	Level of awareness among APs, other stakeholders and vulnerable groups on project implementation procedures and potential impacts	Focus group discussions and individual interviews with a cross-section	Bi-annually	SEP manager and team, project partners and third party monitor
6.	No. consultations conducted with APs, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partners	Monthly	SEP manager and team and project partners
7.	Type of issues/concerns raised and discussed at consultative meetings	Review of reports on consultations	Monthly	SEP manager and team and project partners
8.	Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly	SEP manager and team, project partners and third party monitor
9.	Feedback sessions conducted with APs, other stakeholders and vulnerable groups to report on the decisions made	Review of progress reports, and focus group discussions and individual interviews with a cross-section	Bi-annually	SEP manager and team, project partners and third party monitor
10.	Level of satisfaction among APs, other stakeholders and vulnerable groups on the consultative process and its outcomes	Feedback surveys, focus group discussions and individual interviews with a cross-section	Annually	SEP manager and team, project partners and third party monitor
11.	No. grievances/complaints received and resolved	Review of progress reports and GRM database	Quarterly	SEP manager and team, and third party monitor
12.	Level of efficiency and responsiveness of the GRM	Review of the records of GRC meetings and decisions made	Bi-annually	SEP manager and team, and third party monitor

No.	Monitoring Indicators	Methods	Timeframe	Responsibility
13.	Level of satisfaction among APs, other stakeholders and vulnerable groups on the overall performance of GRM	Focus group discussions, feedback surveys and individual interviews with a cross-section of parties who reported grievances	Annually	SEP manager and team, and third party monitor

8.2 Reporting Back to Stakeholder Groups

The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through bi-annual meetings, newspaper supplementary, websites, mobile phone apps, social media and posters displayed at strategic locations.

8.3 Reporting to the World Bank

The SEP manager and the team will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank.